Adjusting to a changing world while sticking to principles. International Labour Organization responses to the challenges facing social protection systems in the 21st century

Authors contribution:

A - Research project

B - Data collection

C - Statistical analysis
D - Data interpretation

E - Manuscript preparation

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To Michael Cichon (1953–2022), leader of the change in the landscape of the global social protection debate, and to Wolfgang Scholz (1951–2020), a tenacious defender of social security principles.

Introduction: The paper analyses – basing itself on reports and other documents created by different parts of the International Labour Organisation (ILO) – the process which led to the adoption of Social Protection Floor Recommendation No. 202 and the shift in focus of social policy advice towards basic protection and to the Global South countries. We look at the actions of different actors which shape the standard setting and policy stand of the organisation.

Objective: To provide a comprehensive analysis of the historical trajectory of ILO social security standards, examining the evolution of principles, conventions, and the global dynamics that have shaped the organization's approach to social protection over time.

Materials and methods: The methods include examining ILO documents, relevant subject literature, and the author's participant observations from over twenty-years of service in the ILO's Social Security Department, aiming to provide insights into the decision-making processes within the organization.

Results: We conclude that change was brought by: 1) shift in the membership of the ILO and of its decision-making bodies towards the increased presence and powers of representatives from countries of the Global South, 2) the shift in the global development community policy priorities towards poverty reduction, 3) emergence of experimental social assistance schemes in Global South countries, with designs often ignoring principles embedded in the ILO standards.

The Social Protection Floor Recommendation complements previous standards in response to the challenges of widespread poverty and informality and spreading atypical forms of employment. It provides two directions of policy responses: 1) formalizing informal employment relationships and 2) expanding universal or targeted rights-based social assistance schemes.

Assistance provided by ILO to member states focuses now more on building the non-contributory schemes and on identifying the fiscal space necessary to close the coverage gaps. Nowadays, the ILO must collaborate more than before with other development partners and the main challenge is to build among them awareness and acceptance of the principles of the ILO social security standards.

Key words: global social policy, International Labour Organization, international labour standards, social protection, social security

Dopasowywanie się do zmieniającego się świata, ale w zgodzie z zasadami. Reakcje Międzynarodowej Organizacji Pracy na wyzwania stojące przed systemami zabezpieczenia społecznego w XXI wieku

Wprowadzenie: W artykule przeanalizowano – opierając się na raportach i innych dokumentach stworzonych przez różne części Międzynarodowej Organizacji Pracy (MOP) – proces, który doprowadził do przyjęcia zalecenia nr 202, dotyczącego krajowego minimalnego zakresu ochrony socjalnej i przesunięcia punktu ciężkości doradztwa w obszarze polityki społecznej w stronę podstawowej ochrony oraz kwestii związanych z krajami Globalnego Południa. Autor przygląda się działaniom różnych podmiotów, które kształtują standardy i stanowiska polityczne MOP.

Cel: Dostarczenie wszechstronnej analizy historycznej trajektorii standardów zabezpieczenia społecznego MOP, zbadanie ewolucji zasad, konwencji i globalnej dynamiki, które na przestrzeni czasu ukształtowały podejście tej organizacji do ochrony socjalnej.

Materiały i metody: Metody obejmują analizę dokumentów MOP, odpowiedniej literatury oraz obserwacji osób z ponad dwudziestoletnim stażem pracy w Departamencie Ubezpieczeń Społecznych MOP – wszystko to, aby uzyskać wgląd w procesy decyzyjne w organizacji.

Wnioski: Uznaje się, że transformacje zostały spowodowane przez: 1) zmiany w składzie MOP i w jej organach decyzyjnych, które zwiększyły obecność i uprawnienia przedstawicieli krajów tzw. globalnego Południa, 2) przesunięcie w ogólnoświatowym rozwoju priorytetów polityki wspólnotowej, które zmierzają do ograniczenia ubóstwa, 3) pojawienie się eksperymentalnych programów pomocy społecznej w krajach globalnego Południa, a projekty tych programów często ignorują zasady zakorzenione w standardach MOP.

Zalecenie dotyczące poziomów ochrony socjalnej uzupełnia poprzednie standardy w odpowiedzi na wyzwania związane z powszechnym ubóstwem i nieformalnością oraz rozpowszechnianiem nietypowych form zatrudnienia. Zapewnia ono dwa kierunki reakcji politycznych: 1) sformalizowanie nieformalnych dotąd stosunków pracy oraz 2) rozszerzenie uniwersalnych lub ukierunkowanych systemów pomocy społecznej opartych na prawach.

Pomoc udzielana przez MOP państwom członkowskim koncentruje się obecnie głównie na budowie systemów nieopartych na składkach i identyfikacji przestrzeni fiskalnej niezbędnej do zlikwidowania luk w zakresie objęcia ochroną społeczną. Obecnie MOP musi bardziej niż kiedykolwiek współpracować z innymi partnerami rozwojowymi, a głównymi wyzwaniami są poszerzanie świadomości i akceptacja zasad standardów zabezpieczenia społecznego MOP.

Słowa kluczowe: globalna polityka, Międzynarodowa Organizacja Pracy, międzynarodowe standardy pracy, ochrona socjalna, zabezpieczenie społeczne

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Introduction

The International Labour Organisation (ILO) was established in 1919 by Part XIII of the Peace Treaty of Versailles in the belief that peace "can be established only if it is based upon social justice". And those drafting this part of the Treaty had no doubts that one of the key conditions to secure peace is to urgently improve the working conditions of people in a globalising world, and that these required – among other things:

protection of the worker against sickness, disease and injury arising out of his employment, the protection of children, young persons and women, provision for old age and injury.²

ILO started to adopt standards concerning social security immediately, starting from its first International Labour Conference (ILC) which adopted the Maternity Protection Convention No 3. Up until 2023, ILO has adopted 31 conventions and 24 recommendations directly concerning social security. Usually, authors³ distinguish three "generations" of social security standards reflecting adjustments to the changing environments, attitudes and challenges. The first generation (1919–1939) brought 15 conventions and 11 recommendations, which developed and consolidated the social insurance model on the principles which social insurance schemes in the industrial countries were built on during that period, that is on compulsory affiliation; administration by non-profit, self-governing institutions; administrative and financial supervision of the State; and the association of insured persons to the management of social insurance institutions.⁴ Although most of these standards were replaced after the Second World War by new ones, these principles – have kept their relevance in the world today.⁵

The Declaration of Philadelphia adopted in 1944 (originating from new approaches to social security brought in during the war by the Beveridge Report and the Atlantic Charter) announced a second generation of social security standards aiming at comprehensive (in the scope contingencies covered) and universal (in the extent of personal coverage) protection and promised

the extension of social security measures to provide a basic income to all in need of such protection and comprehensive medical care.⁶

I ILO Constitution, preamble, first sentence, https://www.ilo.org/dyn/normlex/en/f?p=1000:62:0::NO:62:P62_LIST_ENTRIE_ID:2453907:NO (18.7.2023).

² Ibid., preamble, second paragraph.

³ See, for example, G. Uścińska, Europejskie standardy zabezpieczenia społecznego, Warszawa 2005, pp. 46–47, and Committee of Experts on Application of Conventions and Recommendations (CEACR), Social Security and the rule of law. General Survey concerning social security instruments in light of the 2008 Declaration on Social Justice for a Fair Globalization, Report to the ILC, Geneva 2011, pp. 8–14.

⁴ Committee of Experts on Application of Conventions and Recommendations, Social Security and..., op. cit., p. 9.

⁵ As illustrated using special procedures under article 24 (Representations of non-observance of Conventions) of the ILO Constitution concerning the non-observance by Chile of Convention No. 35 following this country's decision to introduce a fully funded pension scheme and to entrust its administration to profit-seeking private companies. See ibid., p. 9.

⁶ ILO Declaration of Philadelphia concerning the aims and purposes of the International Labour Organisation, art. III, p. f, https://www.ilo.org/static/english/inwork/cb-policy-guide/declarationofPhiladelphia1944.pdf (18.7.2023).

Income Security Recommendations No. 67 and Medical Care No. 69, adopted during the same conference established a social security model based on poverty prevention as the main objective, the provision of comprehensive protection for all the contingencies either by social insurance (preferably) or by social assistance (for those, for some reasons not covered by social insurance) and universality of coverage (including self-employed and other parts of the general population). The short period of the second-generation standards (1944–1952) was crowned in 19527 with the adoption of the ILO convention No. 102, concerning minimum standards in social security (becoming later a template for the European Code of Social Security). Convention No. 102 codified what was already spelled out by Recommendation 67 and 69 in terms of the scope of contingencies and opened the possibility for countries to comply with the convention using either social insurance schemes, or residence-based universal or means-tested schemes. For the development of social security in the industrialized world, the Convention played undoubtfully a very important role. It then became a social policy benchmark globally, also in the Global South. However, from the point of view of countries emerging from the colonial era and embarking on their development paths, it failed to include universality as an objective and oblige countries, after reaching the minimum coverage required to ratify the convention, to embark on the gradual process aimed at universal coverage. It failed as well⁸ to explicitly state that the social security system is a combination of social insurance, social assistance and other complementary benefits and services and that to comply with the Convention countries should report how different schemes effectively cover different groups of the population. It seems to be also a failure of the ILO in relation to those supervisory bodies which usually have not supported such an interpretation of the Convention. And, in terms of the required benefit levels, the convention missed any explicit statement that poverty prevention and eradication is an objective of social security policy. The only explicit relative minimum threshold which one may obtain from the Convention, and which would apply to social assistance benefits is (depending on the contingency) 40-50% of the wage of an "ordinary labourer" (probably the minimum wage in most of Global North countries, but hardly applicable in many countries of the Global South where an "ordinary" labourer is most probably working in the informal sector where minimum wage regulations do not apply).

At the end, for decades, both inside the ILO and elsewhere, Convention 102 was (wrongly) interpreted as a social insurance convention while the contents of Recommendations 67 and 69 were completely forgotten. Also, until the mid-nineties, ILO Social Security Department had not built up significant technical capacity in the area of social assistance

⁷ In the same year ILC adopted also key Maternity Protection Convention No. 103, complementing Convention 102 and revising Convention No. 3 from 1919.

⁸ K. Hagemejer, The right to social security and its implementation: What role ILO social security standards can play? [in:] Social Security Review: Evolution of Social Security in South Africa: An Agenda for Action, eds. S. Motala, S. Ngandu, T. Hart, Pretoria 2021, pp. 51–60, https://www.social-protection.org/gimi/gess/RessourceDownload.action?ressource.ressourceId=30588 (18.7.2023).

⁹ Evidence for it one can be found in the flagship publication of the Social Security Department of the ILO, Introduction to social security (first edition in 1958, last in 1989, published in many languages), which was treated by the

which would allow it to provide advice to member countries in this field. Only starting in the mid-nineties, with the development of the social budgeting concept, ¹⁰ ILO experts started to look at overall social protection systems in a comprehensive way, analyse their policy coherence and fiscal sustainability, promote such an approach in member countries and provide technical assistance and capacity building – first in the transition countries of central and Eastern Europe (i.e., Bulgaria, Lithuania, Slovakia, Ukraine, Poland) and then in the Global South (i.e., Namibia, Panama, South Africa, Tanzania, Thailand, Zambia).

In 1952, the convention on minimum standards, was intended to apply to countries which are in the process of building their social security systems, and was supposed to be followed by another convention setting standards for countries with more advanced social security systems already in place. Tor some reasons this plan was never implemented. Instead, starting in 1964, the ILO adopted several Conventions (and associated Recommendations) which either established higher standards than Convention 102 for specific branches of social security (Employment Injury Convention No. 121 (1964), Invalidity, old-age and survivors' Convention No. 128 (1967), and the Medical care convention No. 130 (1969) or deal with migrant workers: Equality of Treatment (Social Security) Convention No. 118 (1962) (No. 118). These conventions form a so-called third generation of standards. To the third generation belong also conventions adopted in the nineteen-eighties, after more than a decade break: Maintenance of Social Security Rights Convention No. 157 (1982) concerning the rights of migrant workers, and, later in 1988, Convention No. 168 concerning employment promotion and protection against unemployment. It is not clear if this convention put an end to the third generation of standards, or rather started new conceptual thinking within social security standard setting which integrates social security into other social policy areas – in this case, with employment and labour market policies. To a certain extent, the same question applies to Maternity Protection Convention No. 183, adopted in 2000. This convention is certainly broader in scope that the social security policy area and declares universality in terms of coverage: "this Convention applies to all employed women, including those in atypical forms of dependent work" (Article 2.1).

While discussions continued among experts on how the future social security standard might look, there were only a few standard setting initiatives in this area in the eighties and nineties.¹³ One the reasons was that some (among social security experts and trade

ILO as a kind of "bible", a must read for all the new adepts in the policy area. Nowhere, even in its chapter listing all the "relevant" ILO social security standards, Recommendations 67 and 67 are mentioned.

¹⁰ W. Scholz, M. Cichon, K. Hagemejer, Social Budgeting, Geneva 2000.

¹¹ International Labour Organization, *Minimum standards of social security*, Report of the ILC, 35th Session, 1952; Geneva 1951, and Committee of Experts on Application of Conventions and Recommendations, *Social Security and the rule of law...*, op. cit., pp. 10–11.

¹² Committee of Experts on Application of Conventions and Recommendations, *Social Security and the rule of law*, p. 11: "[...] due to the complexity of the debate and the lack of time, the idea was ultimately abandoned".

¹³ CEACR (ibid., p. 12) explains it this way: "This lengthy period hides what might be called the missing generation of international social security standards, which, if adopted in the nineties, might have better guided social security into the new era of globalization, deregulation and privatization engendering integrated policies, social safety nets and public and private partnerships. The reasons why the succeeding generation of social security standards has not seen the light should in all probability be found in the general retreat of the welfare state shifting large parts

union activists), were afraid that – considering the "retreat of the welfare state" mood dominating in many public policy debates and reforms in the 1980s and 1990s – any standard setting debate in this area would only lead to reduced levels of public guarantees and of the levels of protection. That is why, although for all it was clear that existing standards are not sufficient to face the challenge of prevailing informality and enormous global gaps of social security coverage, no standard setting actions were even seriously proposed, and the new generation of social security standards have not materialized.

The situation started to change at the beginning of 21st century, when a sequence of reports, discussions and decisions gradually led to the adoption of the Social Protection Floor Recommendation in 2012. This paper tries to analyze why and how it happened and what are the consequences for the future. The hypothesis is that the change was brought by: 1) a shift in the membership of the ILO and its decision making bodies towards the increased presence and powers of representatives from Global South countries 2) the emergence of experimental social assistance schemes in Global South countries, both driven domestically but also by international organizations other than the ILO (the World Bank), with designs often ignoring principles embedded in the ILO standards, and 3) the shift in the global community development policy objectives (i.e., adoption of the Millennium Development Goals in 2000 with halving poverty being the first objective but also the implications of the Great Recession of 2007–2009). As far as the future is concerned, one still has to wait to see if Recommendation No. 202 opens a new generation of ILO social security standards and will lead to a new ILO or United Nations (UN) social protection convention. ¹⁵

The purpose and method

The very objective of this paper is thus to describe how the priorities and policy position of the International Labour Organisation on social security/social protection have evolved during the first two decades of the 21st century and what were the main driving factors behind such an evolution. Analysis is based on documents elaborated by different bodies of the Organisation, on literature discussing the role of the ILO and other international organizations in shaping global social protection policy and on the participant observations of the author, who served for more than twenty years as an official of the International Labour Office in its Social Security Department.

of its social responsibilities to the care of the private sector, financial markets and the providence of individuals themselves".

¹⁴ See, for example: K. Müller, Contested universalism: from bonosol to renta dignidad in Bolivia, "International Journal of Social Welfare" 2009, Vol. 18, Issue 2, pp. 163–172, and B. Schubert, Beware of the crocodile: Quantitative evidence on how universal old age grants distort the social assistance systems of low-income countries, "Poverty and Public Policy" 2020, Vol. 12, Issue 2, pp. 188–205.

¹⁵ See M. Cichon, Let Us Walk the Talk: The Right to Social Security and Social Protection – the Case for a New International Convention, "Polityka Społeczna" 2020, Vol. 15, Issue 1, pp. 31–34.

With respect to the latter, one may ask if it is of any interest for researchers and other readers to know too much about the internal mechanisms within the organisation which have led to specific outcomes in the form of standards, declarations or other official documents and reports publicly available. Michael Cichon, in the text¹⁶ which is at the same time commemorating Bob Deacon (died in 2017) and reviewing B. Deacon's book¹⁷ devoted to the process which led to the adoption of ILO Recommendation No. 202, criticizes such an approach referring to the famous saying attributed to the German Chancellor Otto von Bismarck:

To retain respect for sausages and laws, one must not watch them in the making.¹⁸

M. Cichon insists further, that

personalizing the different views and political moves that ultimately led to the formulation of the final concept of the SPF and its acceptance by the Global Community of ILO members limits the credibility and authority of the final outcome... Most people want to enjoy the sausage and are much less interested in which butcher played what role in making it.¹⁹

It is thus about the credibility and authority of the International Labour Conference, global labour parliament, consisting of the representatives of governments, trade unions and employers, which meets every year in June and here for over a hundred years and has the sole authority to adopt, in democratic voting, international labour standards: conventions and recommendations. As the International Labour Organisation is the only organisation within the broadly defined UN system (thus including international financial organisations like the World Bank (WB) and the International Monetary Fund – (IMF)) where international standards and other policy documents are adopted in the process which includes not just governments but also representatives of civil society (workers and employers organisations), its credibility and authority seems to be especially worth securing. I do not think, however, that the sausage-production parable makes sense. To secure credibility and authority from both national and international law as well as from governments and international organisations, it is key that the law and policy making processes are transparent and that we all understand the mechanisms driving it. And this is why we devote so much attention to the decision-making processes within the organization, in our view, not sufficiently explored in B. Deacon's book on the "foundations of social protection floor". 20 B. Deacon's book focuses on what he sees

¹⁶ M. Cichon, Bob Deacon and the making of sausages, "Global Social Policy" 2019, Vol. 19, Issue 1–2, pp. 21–24; https://doi.org/10.1177/1468018119849206.

¹⁷ B. Deacon, Global social policy in the making: The Foundations of the Social Protection Floor, Bristol 2013.

¹⁸ M. Cichon, Bob Deacon..., op. cit., p. 21.

¹⁰ Ibid. p. 22.

²⁰ At the same time, it is not the intention if this paper to critically analyse B. Deacon's theoretical framework adopted in the book, based on the concepts of agency, structure, institutions and discourse (ASID). B. Deacon, op. cit., pp. 143–155.

as the "development of the ILO-,UN-,G20-, and World Bank-endorsed SPF global policy", ²¹ while this paper's focus is on the development of the new international labour standard in the form of Recommendation No. 202. At the end of the paper, we indicate that such a broad endorsement of imprecisely designed "social protection", in practice of policy advice given to countries of the Global South, not necessarily complies with the principles embedded in the ILO recommendation.

Who decides on the social security policy recommendations of the ILO?

To answer the question on what the position of the "ILO" on social security is and why and how it has been evolving, one needs to understand what the different decision-making bodies are, what are the outcomes produced and publicly distributed (standards, declarations, reports, statements etc.), and what is the process which leads to the adoption of new international labour standards, and how the policy recommendations given to member countries are shaped and by whom. The recent centenary celebrations of the ILO stimulated a significant portion of research, both on ILO history and on its governance system, including analysis of the decision-making mechanism within the organisation. ²² Apart from the constitutional bodies of the Organisation there are also other stakeholders who have a direct or indirect impact on policy directions and choices: international trade union federations, international associations of employers, other organisations of the UN system, international financial organisations like the IMF and the World Bank, bilateral donors belonging or not to the OECD (Organization for Economic Co-operation and Development) Development Assistance Committee, and major international NGOs.

The ILO Constitution establishes two decision making bodies which are both tripartite. The International Labour Conference (ILC), meeting usually once a year, is composed of delegates from all the organisation's member countries. Each country is represented by four delegates with voting rights – two government delegates, one trade union delegate and one employer's delegate. The Conference adopts new (or revises old) conventions and recommendations – adoption requires a two-thirds majority (that means, for example, that governments voting jointly with one of the social partners can outvote the other social partner²³). The Conference, in its committees, discusses also periodically major labour market and social policy areas seen as a priority by the Organisation. Such "recurrent" discussions on social security took place this century every 10 years: in 2001, 2011 and 2021.

²¹ Ibid., p. 147.

²² See particularly relevant analysis in: M. Luis, Who Decides? Representation and Decision-Making at the International Labour Organization, "International Development Policy" 2019, Vol. 11, pp. 40–58.

²³ It happens not often, usually there is an effort to achieve consensus on the contents of the new standard adopted. These efforts often lead to many compromises, significantly watering down the outcome. When it happens on the other hand, sometimes the outvoted social partner tries to contest the validity of the standard.

In 2001, the ILC in its conclusions recalled the Declaration of Philadelphia of 1944 stating that it is

the solemn obligation of the International Labour Organization to further among the nations of the world programmes which will achieve [...] the extension of social security measures to provide a basic income to all in need of such protection and comprehensive medical care and declared that it is time for a renewed campaign by the ILO to improve and extend social security coverage to all those in need of such protection.²⁴

In 2011, the ILC asked the Governing Body

to place a standard-setting item entitled Elaboration of an autonomous Recommendation on the social protection floor on the agenda of the 101st Session of the International Labour Conference, 2012, for a single discussion with a view to the adoption of a Recommendation.²⁵

The conclusions of the social security discussions at that conference included the appendix *Elements of a possible Recommendation on social protection floors.* ²⁶ In 2012, the ILC adopted the Social Protection Floors Recommendation in an unanimous vote (only the government of Panama abstained).

In 2021, the ILC, after discussing the Office report Building the Future of Social Protection for a Human-Centred World of Work, ²⁷ adopted conclusions which constitute a "framework for action" for ILO member states and for the Governing Body and the Office, to promote universal social protection. Maybe the biggest novelty, compared to previously adopted documents, is the significant attention paid to cooperation with other international organisations and other "development partners" (with the emphasis on the necessity to sensitize those partners to the need to comply with international labour standards) and support for all the options for mobilizing international financing for social protection, including a willingness

to engage in discussions on concrete proposals for a new international financing mechanism, such as the Global Social Protection Fund.²⁸

²⁴ International Labour Organisation, Social Security: A New Consensus, Geneva 2001, p. 1, http://www.ilo.org/public/english/protection/secsoc/downloads/353sp1.pdf (18.7.2023).

²⁵ International Labour Organisation, Social Security for All. The Strategy of the International Labour Organization, Resolution and conclusions concerning the recurrent discussion on social protection (social security), adopted at the 100th Session of the ILC, 2011, p. 3, https://www.social-protection.org/gimi/gess/RessourceDownload.action?ressource.ressourceId=30588 (18.7.2023).

²⁶ Ibid., pp. 14-15.

²⁷ International Labour Organisation, Report V Submitted to the 109th Session of the International Labour Conference, Geneva 2021, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_780953.pdf (18.7.2023).

²⁸ International Labour Organisation, Record of proceeding (7A), Reports of the Recurrent Discussion Committee: Social protection (social security): Proposed resolution and conclusions submitted to the Conference for adoption, ILC 109th Session, 2021, section III: Reaffirming the ILO's mandate and leadership in social protection in the multilateral system and promoting policy coherence, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_804457.pdf (18.7.2023).

After the 2011 and 2012 conferences debating social protection floor recommendations, ILO was criticized by some experts and non-governmental organisations for the lack of explicit support for the idea of a global social protection fund.²⁹

The Governing Body is composed of fifty-six members (28 representatives of the governments, 14 of the trade unions and 14 of employers' organizations). Ten of the government seats are permanently held by so-called states of chief industrial importance (currently: Brazil, China, France, Germany, India, Italy, Japan, the Russian Federation, the United Kingdom and the United States). The other Government members are elected by the Conference every three years, while the employers and trade union members are elected in their individual capacity. The Governing Body decides on the work programme for the secretariat (the International Labour Office) and its budget: its decisions are thus key for the development of any of the ILO focus policy areas. Social protection is only one of them and never dominating the policy-oriented budget (employment policy related topics have been for decades budgetary priority areas for standard setting activities, research agendas and technical assistance to member countries³⁰).

While government representatives are organised into regional groups and try to coordinate their positions within such groups but at the same time have the full right to speak and vote separately, trade unions and employers' organisation form respectively the Workers Group and Employers Group, presenting at all ILO tripartite meetings (starting from the ILC, through the Governing Body to any tripartite conferences or workshops) usually unified common group positions. Both groups are linked to respective external organizations: workers to the International Trade Union Confederation (ITUC) and employers to the International Organisation of Employers (IOE). In the majority of cases, to adopt any document from such a meeting one needs to achieve a compromise between the governments, workers and employers. This often means that the contents of the documents are somehow "watered-down" compared to the original intentions, while the wording used is purposely open to many interpretations. One needs to read the records of such meetings and the group and individual statements presented there to be fully aware of the differences in positions. In the ILO internal social security debate, the major difference in positions, for three decades already, concerns pensions reforms and in particular those reforms which move from defined-benefit pensions with solidarity-based financing to defined-contribution schemes and individual savings accounts. Employers group actively support pension privatizations and sometimes even cedes its expertise on that matters to Federación

²⁹ B. Deacon, op. cit., pp. 173-178.

³⁰ For example, ILO Programme and Budget for biennium 2024/25 identifies eight policy outcomes: 1) standard setting and supervision; 2) strengthening tripartite social dialogue; 3) full and productive employment for just transitions; 4) sustainable enterprises; 5) gender equality and equal opportunities and treatment for all; 6) Protection at work for all; 7) universal social protection for all; 8) Integrated policy and institutional responses for social justice. Social protection policy outcome (managed by Social Protection Department) were allocated 8.8% of the total amounts for policy related activities, compared to 8.6% over the previous two budgetary cycles. See: International Labour Organisation, *Programme and budget for the biennium 2024–25*, Geneva 2023, Table 2, pp. 19–20.

Internacional de Administradoras de Fondos de Pensiones (FIAP), whose "corporate purpose" – according to their web page – is:

to disseminate, promote, defend, publicize and otherwise facilitate the development of social security systems based on saving and individual capitalization, through pension funds managed by financial services companies: pension fund administrators.³¹

Not only from the Workers Group's position, but also expertise from the Committee of Experts on the Application of Conventions and Recommendations and of the Office's Social Security/Protection Department, are pointing out that defined contributions schemes and individual savings accounts can form only supplementary parts of national pension systems as such schemes cannot deliver outcomes complying with international social security standards objectives, principles and requirements.³²

The International Labour Office, is the secretariat of the Organisation led by the Director General (DG), elected by and reporting to the Governing Body. The Office, according to the Constitution, is responsible for preparing reports and other documents feeding into discussion on the agendas of International Labour Conference, for providing requested assistance to governments, trade unions and employers organisations of the member countries and for undertaking and publishing research relevant to the mission of the organisation. As pointed out by Wolfgang Scholz,³³ while in the past in addition to the secretarial functions, the Office constituted a relatively small but globally relevant³⁴ think thank concentrating on economic and employment policies, for the last few decades significantly increased has the Office's involvement of the Office in projects providing all

³¹ FIAP, Objectives, https://www.fiapinternacional.org/en/objectives/ (18.7.2023).

³² Office publication: I. Ortiz, F. Durán-Valverde et al., Reversing Pension Privatizations: Rebuilding public pension systems in Eastern Europe and Latin America, Geneva 2018, was met with public criticism from the Employers Group expressed at the 2021 ILC during the discussion in the Conference's Committee on the Application of Standards related to the CEACR's General Survey report concerning implementation of the Recommendation No. 202. Both there and at the "Tripartite Round Table on Pension Trends and Reforms", organised in 2022 in order to continue the debate at the wider forum, employers' speakers (among them Guillermo Arthur, chairman of FIAP) insisted on the need to revise ILO solidarity principle in financing social protection in order to reach "adequate balance between social solidarity and private provision including a reduction of benefits if necessary" and "PAYG systems were no longer sustainable for demographic reasons". See: Committee on the Application of Standards, Discussion of the General Survey concerning the Social Protection Floors Recommendation, 2012 (No. 202), Verbatim document C.App./PV.General Survey, 2019, https://www.ilo.org/ilc/ILCSessions/108/committees/standards/WCMS_710395/lang--en/index.htm and also International Labour Organisation, Tripartite Round Table on Pension Trends and Reforms (30 November-2 December and 4 December 2020), Record of proceedings (Meeting report) (18.7.2023). As showed by the above mentioned debate in the Conference's Committee on the Application of Standards related to the CEACR's General Survey report concerning implementation of Recommendation No. 202, differences in positions between Employers Group on the one side, and the Workers Group on the other, and CEACR and the Office expertise are revealed also in the discussions concerning ways social assistance is targeted to potential beneficiaries or assessment of governments' austerity fiscal measures affecting the adequacy of social protection systems.

³³ W. Scholz, The European Social Model and the International Labour Organization – Origins and Transformations, "Polityka Społeczna" 2020, Vol. 15, Issue 1, pp. 31–34, footnote 6.

³⁴ There is a long list of prominent economists, many of them Nobel Prize winners, closely collaborating in their research work with the ILO and publishing in International Labour Review, a journal published by the Office and its research arm since 1921. Among them: Bertil Ohlin, Abba Lerner, Alva Myrdal, Michał Kalecki, Jan Tinbergen, Arthur Lewis and – more recently Amrtya Sen and Joseph Stiglitz. See: P. Bollé, *The International Labour Review and the ILO: Milestones in a shared history*, "International Labour Review" January 2013, Volume 152/S1.

kinds of technical assistance to member countries. This significant shift in the allocation of the Organization's resources to technical assistance projects has resulted, of course, from the similarly significant shift in the membership of the organization with Global South countries more and more dominating over the countries of the Global North – and thus the Organization has had to become more responsive to the needs of low- and middle-income countries. This shift is also to a certain extent reflected in a change in the composition of the Governing Body, although still only three of the ten permanent seats at the Governing Body are held by Global South countries: Brazil, China, and India. Important is also the shift in the composition of the staff of the International Labour Office (more apparent in managerial and expert field office positions, less so at headquarters). Juan Somavia from Chile, the ninth ILO Director General, serving from 1999 to 2012, was the first ILO DG originating from the Global South. In addition, in the same period – key for our analysis – the deputy director general responsible for social protection was Assane Diop from Senegal. A. Diop submitted his candidature for the ILO DG's elections in 2012 but lost. In 2022, the Governing Body of the ILO elected Gilbert F. Houngbo from Togo as the eleventh ILO DG.

There is one more body, which although it is not set up by the ILO Constitution and is not tripartite, is with any doubt important in implementing the ILO policy agenda, including that of social security. The Committee of Experts on the Application of Conventions and Recommendations³⁵ includes twenty independent legal experts, appointed by the Governing Body for a three-year term. The CEACR provides technical evaluation of the application of international labour standards in ILO member States. These evaluations are based on reports that countries which have ratified ILO Conventions are obliged to periodically submit General Surveys which focus on an analysis of the implementation of selected conventions and recommendations within member states. Reports of the CEACR are presented every year to the Application of Standards Committee of the International Labour Conference.³⁶ Conclusions from the reports may lead the ILO to consider either technical assistance to countries to help them to overcome obstacles in implementing the standards, or debate revisions of the existing standards or setting new ones based on good policy practices identified in member countries. In this century, the CEACR presented to the International Labour Conference the results of the two General Surveys concerning ILO social security standards.

The first one was presented to the ILC in 2011,³⁷ the same conference which had "recurrent" discussion on social security,³⁸ followed the next year by the standard setting

³⁵ See: International Labour Organization, Monitoring compliance with international labour standards: The key role of the ILO Committee of Experts on the Application of Conventions and Recommendations, Geneva 2019.

³⁶ See: The Committee on the Application of Standards of the International Labour Conference, A dynamic impact built on decades of dialogue and persuasion, Geneva 2011.

³⁷ Committee of Experts on Application of Conventions and Recommendations, Social Security and..., op. cit.

³⁸ See the Office report for that debate: International Labour Office, Social Security for Social Justice and a Fair Globalization: Recurrent Discussion on Social Protection (Social Security) under the ILO Declaration on Social Justice for a Fair Globalization, Report VI, 100th Session of the International Labour Conference, Geneva 2011.

discussion and adoption of the Recommendation No. 202. This report reviewed the implementation of Convention 102 concerning minimum standards in social security adopted in 1952 and revived the two Recommendations adopted in 1944: Income Security Recommendation, No. 67 and the Medical Care Recommendation, No. 69 – for decades forgotten although recognized as up-to-date standards.³⁹ The report stressed the continuing relevance of all these instruments but at the same time stated that the current ILO mandate and mission in social security, which is

to extend social security coverage to all beyond the formal economy to the masses of population living in abject poverty and insecurity, [...] has largely outgrown the standards with which it has to be implemented. The available means are no more sufficient to meet the new ends.⁴⁰

And then the report concludes with:

The Committee is certain that the task of globalizing social security requires the ILO to complement the current set of up-to-date standards with a new high-impact instrument embedding social security in a new development policy paradigm and designed so as to be accepted by all ILO member States.⁴¹

The other General Survey published in 2019 and presented to the ILC focussed on the implementation of the Recommendation No. 202.⁴² The report summarizes that although the guidance provided by the Recommendation is gradually being transformed into adequate and sustainable national social protection policies, important gaps and challenges to the achievement of universal social protection remain. It reminds one that only 29 per cent of the world population enjoys access to comprehensive social security coverage. However, the report concludes optimistically:

With effective implementation, Recommendation No. 202 opens the way into the future of social protection. Recommendation No. 202 constitutes a new international reference for the future development of national social protection policy and legislation, as well as international cooperation. By setting out fundamental principles and a framework for the development of comprehensive, universal and adequate social protection systems, it embodies a new paradigm for social protection in the twenty-first century which calls for effective implementation.⁴³

³⁹ The report stressed: "The income security and medical care Recommendations were visionary instruments, which laid down the new doctrine of universality as the basis for the development of social security. These two Recommendations reflected a fundamental change of paradigm in social security policies, as focus was shifted from social security protection for workers to the protection of the whole population." Committee of Experts on Application of Conventions and Recommendations, *Social Security and...*, op. cit., p. 17.

⁴⁰ Ibid., p. 13.

⁴¹ Ibid., p. 14.

⁴² Committee of Experts on Application of Conventions and Recommendations, Universal social protection for human dignity, social justice and sustainable development. General Survey concerning the Social Protection Floors Recommendation, 2012 (No. 202), Geneva 2019.

⁴³ Ibid., p. XIII.

Sources of funding also have an important impact on the policy directions of the organization. How are ILO activities funded? One must remember that the ILO is not a funding organization (like the IMF, World Bank, or even UNICEF) and thus the Office's activities (such as research, publications, technical assistance to member countries) must come either from the regular budget or from external donors. The Office's regular budget is funded from member countries' contributions and – as members' contributions are related to the size of their economy – the largest portion of the funding still comes from the countries of the Global North. With the "zero growth" budget policies imposed by the major contributors on the United Nations on the one hand, and increasing demands for technical assistance from the countries of the Global South on the other, the role of external financing for all UN organizations, including the ILO, had to significantly increase.

International Labour Office programmes in social security are implemented by its section called until 2013 the "Social Security Department" and since 2013 the "Social Protection Department". In the ILO budget, adopted in 2023 for the biennium 2024–2025, the expected extrabudgetary resources to be allocated to that department were 62,5 million USD, compared to 47,6 million USD allocated to the same purpose by the regular budget (in the preceding biennium it was respectively 52 and 46 million USD). In the past, the role of external financing was much less significant, which also meant that it was mainly the interplay of the Office and the Governing Body which was decisive for shaping the direction of technical activities. With the increase in the role of external funding by the donors, the policy related, and technical activities are also shaped by donor preferences with respect to both the policy and regional focus these donors have. And, policy preferences and geographic focus differ significantly between donors and vary over time, often reflecting political changes. There are some donors who see contributory social security as a core element of the social protection systems of a country, but there are some others who rather want to

⁴⁴ Led until 1990 by Giovanni Tamburi (Italy), until 2001 by Colin Gillion (New Zealand), until 2012 by Michael Cichon (Germany), until 2019 by Isabel Ortiz (Spain) and since then by Shara Razavi (Iranian by birth).

This changing of names is quite confusing for those looking from outside. It happened as part of the Office reorganization undertaken in 2013 by the new DG Guy Rider. It was supposed to reflect that "social protection" became the widely used term in the community of the international organizations and bilateral donors involved in the global policy debate and the fact that in July 2012, the Social Protection Interagency Collaboration Board (SPIAC-B) was established, co-chaired since then jointly by the ILO and the World Bank. The change of the name came from outside the then Social Security Department, when it was weakened during the lengthy inter-regnum period after early retirement of the previous Director, Michael Cichon. The term social security was often seen outside the ILO as being limited to social insurance and other contributory programmes. Not within the ILO however: until the reorganization in 2013, "Social Protection" was the name of one of the four sectors of the office which include in addition to the Social Security Department also departments dealing with policy areas like: occupation safety and health, wages, working time and other working conditions.

⁴⁶ International Labour Organisation, Programme and budget..., op. cit., Table 2, pp. 19–20.

⁴⁷ Of course, in addition there has always been a certain part of resources allocated by the department to meet the governments' demands for technical assistance. Social Security/Protection Department has been always addressed with requests from the governments and social security institutions of the member countries to provide actuarial and related services.

strengthen non-contributory, poverty targeted social assistance, and there are those who would support projects expanding mainly public works programmes, or support microinsurance as an instrument to extend coverage to those working informally. ⁴⁸ Thus, the greater reliance on donor support requires additional efforts to design policy oriented and country work in a way which finds a balance between the principles of the international standards, the expectations of the tripartite membership of the organisation and donor preferences. Also, donors more and more press international organisations of the widely defined UN system to "act as one", or at least in a carefully coordinated manner. For the ILO, as the only standard setting organisation and the only tripartite one within the system, it sometimes poses a challenge to find a common policy position with other organizations active in providing social policy advice and assistance to countries.

A good illustration of the challenges associated with the increasing role of donors in funding the activities of the ILO, might be the Multilateral Aid Review⁴⁹ undertaken in 2011 by the UK government. While until the 2010 general election, the UK as a donor played important role in promoting a rights-based approach to social protection and eagerly funded the ILO's Social Security Department research on affordability of social protection even in low-income countries and on the positive economic and social impacts of extending social security coverage, after the change of government the attitude towards development aid in general and towards multilateral organizations has changed. Under the overall objective of ensuring to the British taxpayer "value for money" in foreign aid,50 the review used two sets of criteria: "multilateral organisation's strengths" and "contribution to UK development and humanitarian objectives" and then ranked the organisations giving them scores from "very good" to "poor". The ILO was classified in the bottom part of the ranking with the overall score of "poor". According to the report, the main reasons for the negative assessment were the organizational inefficiencies, partially resulting from the tripartite composition of the organisation's decision making bodies and the responsiveness to requests for technical assistance from social partners and all the member countries, and here not necessarily coming only from the poorest ones. The paradox is that at the very moment of this evaluation the ILO was just in the middle of the process of major change in its standard setting, policy orientation and the directions of technical assistance towards low-income countries.

After the adoption of Recommendation No. 202, it entered into closer partnerships with many international organizations, including the World Bank and World Health

⁴⁸ J. Seekings, International actors and social protection [in:] Handbook on Social Protection Systems, Cheltenham 2021, chapter 29, https://doi.org/10.4337/9781839109119.00065 (18.7.2023).

⁴⁹ Department for International Development, Multilateral Aid Review. Ensuring maximum value for money for UK aid through multilateral organisations, London 2011, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/67583/multilateral_aid_review.pdf (18.7.2023).

⁵⁰ See, for a methodology of support assessment to social protection programmes in low-income countries: Ph. White, A. Hodges, M. Greenslade, Guidance on measuring and maximizing value for money in social transfer programmes, London 2013.

Organisation, ones aimed at universal social protection, with other development partners it achieved explicit inclusion of social protection policies into the Sustainable Development Goals adopted in 2015,⁵¹ and importantly it has been shifting the allocations of its resources toward technical assistance delivered to low-income countries. Let us examine how this happened.

The Change – moving to ILO Social Protection Floor Recommendation and beyond

The Social Security Department (SECSOC) of the ILO had, until recent reforms, two branches: the Social Security Policy and the Development Branch (SOC/POL), dealing with promoting ILO social security standards and assisting countries in implementing them through social security reforms and the Financial, Actuarial and Statistical Branch (SOC/FAS) focused essentially on assessing the financial sustainability of these reforms and helping social security institutions around the world to ensure sound financial governance. However, in the Global South, those institutions predominantly covered those working in the formal economy, while most of the population remained excluded. Thus, while improving the functioning of these institutions was of great importance, more was required to extend social protection and create a fiscal space for social protection in all countries, to bring the world closer to achieving the objective of "social security for all", which had been prominently highlighted by the ILC in 2001. 52

Experts working in the Department shared the belief that social insurance represented a core element of comprehensive social protection systems and an indispensable mechanism of social solidarity as well as for horizontal and vertical redistribution. Despite this, it was realized that going beyond contributory schemes and expanding tax-financed social assistance programmes, which were largely non-existent across low-income countries, was essential to close existing coverage gaps and to build at least minimum levels of protection for all in need. The concept of a "socio-economic floor for the global economy" was introduced by the World Commission on the Social Dimension of Globalization in

⁵¹ Goal 1: End poverty in all its forms everywhere (Target 1.3: Implement nationally appropriate social protection systems and measures for all, including floors, and by 2030 achieve substantial coverage of the poor and the vulnerable, Indicator 1.3.1: Proportion of population covered by social protection floors/systems, by sex, distinguishing children, unemployed persons, older persons, persons with disabilities, pregnant women, new-borns, work-injury victims and the poor and the vulnerable); Goal 3: Ensure healthy lives and promote well-being for all at all ages (Target 3.8: Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all); Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (Target 8.5 by 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value); Goal 10: Reduce inequality within and among countries (Target 10.4: Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality).

⁵² International Labour Office, Social Security: A New Consensus..., op. cit.

2004⁵³ and further spelled out in the 2004 follow-up report by the ILO Director General to the International Labour Conference,⁵⁴ to which the Department contributed.

The Department had to challenge the prevailing doubts on the affordability of social protection for low-income countries and attempted to do it with a series of papers. These papers presented the cost assessments of a basic social protection package and estimated its potential impact on poverty reduction. Simulations confirmed that "nobody is too poor to share" and that social protection was indispensable for building decent societies. However, they also showed that some countries would require international solidarity-based financing to start building their social protection systems. Subsequent ILO simulations showed that only a small proportion of global GDP was required to eradicate extreme poverty.

At the same time, while making efforts to convince policy and decision makers of the need for and the affordability of basic levels of social protection even in the poorest countries, the Department embarked on the task of developing a practical concept to concretize international solidarity for low-income countries as it was obvious that international solidarity should complement domestic efforts and commitment. It brought the proposal for the "Global Trust Fund", which sought to match the efforts of low-income countries to alleviate poverty and extend social security coverage. The concept was piloted in Ghana with financial support from Global North trade unions and NGOs.⁵⁹ The

⁵³ World Commission on the Social Dimension of Globalization, A Fair Globalization – Creating Opportunities for All, Geneva 2004, http://www.ilo.org/public/english/wcsdg/docs/report.pdf (18.7.2023).

⁵⁴ International Labour Office, A Fair Globalization: The Role of the ILO, Report of the Director General to the 92st Session of the ILC, Geneva 2004, http://www.ilo.org/public/english/standards/relm/ilc/ilc92/pdf/adhoc.pdf (18.7.2023).

⁵⁵ See: K. Pal, Ch. Behrendt et al., Can Low Income Countries Afford Basic Social Protection? First Results of a Modelling Exercise, Issues in Social Protection Discussion Paper, ILO, Geneva 2005, https://www.ilo.org/secsoc/information-resources/publications-and-tools/Discussionpapers/WCMS_207725/lang--en/index.htm (18.7.2023); M. Suguru, Ch. Behrendt et al., Can Low Income Countries Afford Basic Social Protection? First Results of a Modelling Exercise for Five Asian Countries, Issues in Social Protection Discussion Paper, ILO, Geneva 2006, http://www.social-protection.org/gimi/gess/RessFileDownload.do?ressourceId=810 (18.7.2023); F. Gassmann, Ch. Behrendt, Cash Benefits in Low-Income Countries: Simulating the Effects on Poverty Reduction for Senegal and Tanzania, Issues in Social Protection Discussion Paper, ILO, Geneva 2006, https://www.social-protection.org/gimi/ShowRessource.action?id=6813 (18.7.2023), and International Labour Office, Can Low-Income Countries Afford Basic Social Security?, Social Security Policy Briefings, Paper No. 3, ILO, Geneva 2008, https://www.social-protection.org/gimi/RessourcePDF.action?id=5951 (18.7.2023).

⁵⁶ Statement attributed to ILO Director General, Juan Somavia. He added: "the world does not lack the resources to abolish poverty, it lacks the right priorities". See also a later paper by M. Cichon, *Hardly Anyone Is Too Poor to Share: A Basic Level of Social Protection Is Affordable Nearly Everywhere*, "Finance & Development Magazine" December 2018, No. 14–15, https://www.imf.org/en/Publications/fandd/issues/2018/12/affordability-of-basic-social-protection-cichon (18.7.2023). Google search reveals also related statement by Pope John Paul II: "Nobody is so poor he has nothing to give, and nobody is so rich he has nothing to receive". The statement reflects very well the very sense of social security systems.

⁵⁷ Building Decent Societies: Rethinking the Role of Social Security in State Building, ed. P. Townsend, London 2009.

⁵⁸ International Labour Organization, Social security for all: Investing in global social and economic development. A consultation, Issues in Social Protection Discussion Paper, Geneva 2006, https://www.ilo.org/wcmsp5/groups/public/--asia/--ro-bangkok/--ilo-manila/documents/publication/wcms_126210.pdf (18.7.2023).

⁵⁹ International Labour Organization, Exploring the Feasibility of a Global Social Trust: Report on the Results of a Feasibility Study and the Recommendations of an Interregional Meeting of Experts (Geneva, 14–16 May 2002), submitted

underlying idea of international solidarity also resonated strongly later with the calls for establishing a global fund for social protection. ⁶⁰

Having formulated arguments backed by concrete figures on the affordability of a basic level of social protection benefits, as well as developing a concept for international solidarity financing for low-income countries, the next important step was to convince the opposition, both inside and outside the ILO.

There were many who were opposed to promoting an approach that went beyond contributory schemes, ⁶¹ there were many who did not want the new standard in social security either because they were afraid it would undermine existing standards, or they did not want any new international labour standards at all. Among those to convince were some of the social security specialists working at the ILO headquarters or in the field, and elsewhere who were afraid that any discussion on the new standard would lead to a weakening in the power of the existing ones or who also believed that the "floor" concept would weaken the contributory social security schemes. It was also important to convince experts in other ILO technical policy areas that the extension of social protection would ensure more and higher quality employment and not otherwise. Key was to convince ILO constituents: governments, that they can afford establishing the floors of protection; trade unions, that the new standard would not dilute the provisions of ILO Convention No. 102 and not lower existing entitlements to social security enjoyed by formal economy workers; and employers that adopting a new social security standard on the extension of social security was necessary and would not affect negatively the business world.

Thus, the need arose to provide further evidence and stronger arguments and to engage in broad dialogue with all stakeholders to forge a coalition of support. After

to the ILO Governing Body: GB.285/ESP/4, Geneva 2002, https://www.ilo.org/public/english/standards/relm/gb/docs/gb285/pdf/esp-4.pdf (18.7.2023); M. Cichon, D. Tumwesigye et al., Linking Community Initiatives to National Institutions: Ghana, "International Social Security Review" 2003, Vol. 56, Issue 3–4, pp. 39–72; International Labour Organization, Improving Social Protection for the Poor – Health Insurance in Ghana, Final Report of the Ghana Social Trust Pre-Pilot Project, Geneva 2005, https://www.ilo.org/wcmsp5/groups/public/---ed_protect/--soc_sec/documents/publication/wcms_secsoc_9357.pdf (18.7.2023); eidem Progress evaluation of the Global Social Trust pilot project, Submitted to the ILO Governing Body: GB.300/ESP/5, Geneva 2007, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_084171.pdf (18.7.2023); and also eidem, Improving Social Protection for the Poor – Health Insurance in Ghana: Final Report of the Ghana Social Trust Pre-Pilot Project, Geneva 2005, https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---soc_sec/documents/publication/wcms_secsoc_9357.pdf (18.7.2023).

⁶⁰ See: O. De Schutter, S. Sepúlveda, Underwriting the Poor: A Global Fund for Social Protection, New York 2012; Global Coalition for Social Protection Floors, Civil society call for a global fund for social protection to respond to the COVID-19 crisis and to build a better future, 2020, https://socialprotectionfloorscoalition.org/civil-society-call/civil-society-call-for-a-global-fund-for-social-protection/ (18.7.2023); International Trade Union Confederation, A Global Social Protection Fund Is Possible, Campaign Brief, 2020, https://www.ituc-csi.org/IMG/pdf/ituc_campaign_brief_-a_global_social_protection_fund_en_v3.pdf (18.7.2023).

⁶¹ And many among them had very strong and valid arguments and concerns: "Social contingencies gradually shifted from solidarity financing onto individuals' shoulders; public social security spending was reduced and replaced with individual private arrangements and reliance on financial markets; social security schemes' members became customers rather than citizens with rights-based public benefits entitlements. The ILO tried to stem the tide, but it was around this time that the international community, including the ILO, gradually replaced the term "social security" with "social protection", the former more perceived as comprising social insurance language and the requirements of the middle classes, while the latter more echoed safety-net language addressing the poor". W. Scholz, op. cit., p. 28.

numerous internal ILO discussions, a consultation paper *Social security for all: Investing in global social and economic development*⁶² was published in August 2006 and distributed widely to ILO members and other international organizations. It referred to the global social-economic floor concept proposed by the World Commission on the Social Dimension of Globalization in 2004. The document conceded that existing international (both ILO and the UN) instruments

say very little on the actual levels of protection and the order of priority by which they should be pursued, thus leaving room for discretion to the ILO and member States. ⁶³

A country can ratify ILO Convention No. 102 and meet its minimum standards by covering only the better-off minority of the population; the Convention does not oblige governments to progressively extend the coverage to the rest of the population to guarantee to all at least a minimum level of income security and access to at least essential health care, which would allow one to prioritize poverty eradication.

The consultation document stated:

The ILO interprets the entirety of (the existing international instruments) as a mandate to define a basic minimum protection package (that could also be described as a "minimum social floor") to fulfil the international recommendations, notably the requirements of article 22 of the Universal Declaration of Human Rights. The floor should, in fact, consist of a hierarchy of floors that must be reached at different levels of development. Setting global floors for social rights and social transfers may halt "the race to the bottom" – when it comes to curbing social rights and social spending – at an acceptable decent level. ILO social security standards with the support of core labour standards (like freedom of association) can be seen as a tool in the global process to protect the fiscal space of social security systems. New and wider instruments might have to follow. ⁶⁴

The consultation paper proposed also that the poorest countries could start with the initial package of benefits, which could include:

- access to basic health care through pluralistic national systems that consist of public tax-financed components, social and private insurance components, equity funds and community-based components that are linked to a strong central system;
- a system of family benefits that helps to combat child labour and permits children to attend school;
- a system of targeted basic cash transfers programmes of social assistance associated
 with public work programmes and similar labour market policies (like cash for
 work programmes) that helps to overcome abject poverty for the able bodied; and
- a system of basic universal pensions for old age, invalidity and survivorship that in effect support whole families⁶⁵

⁶² International Labour Organization, Social security for all:..., op. cit.

⁶³ Ibid., p. 31.

⁶⁴ Ibid., p. 32.

⁶⁵ Ibid., p. 34.

It is in this consultation paper that for the first time the concept of social security "floors" and the need for a new international standard was spelled out publicly. This concept was further developed, to not only spell-out the need for the international community to agree on what a set of basic social benefits ("the global social security floor") would comprise, but also "to assume some responsibility in helping the poorest countries to achieve this". 66

The task of developing a new standard required intensive dialogue with all stakeholders, both inside and outside the ILO, at the national as well as global level. It would take several years and the diplomatic skills of the Department's Director, Michael Cichon, before a consensus was reached, just before the crucial discussion on "Social security for social justice and a fair globalization" at the 2011 International Labour Conference. The International Labour Conference agreed on the key elements of a possible Recommendation and decided to move into a standard-setting discussion the following year (2012). This decision was helped by the social repercussions of the global economic and financial crisis 2008–2009, which had created a growing consensus among governments and international organizations that social protection was a key element of policies aimed at stabilizing economies and making the globalization processes socially acceptable and sustainable. This consensus had led to the establishment of the UN-wide Global Social Protection Floor Initiative in 2009, co-led by the ILO and the World Health Organization, and of the Social Protection Floor Advisory Group under the leadership of Michelle Bachelet in 2011. 68

The Social Protection Floors Recommendation No. 202 was adopted unanimously in June 2012 by the governments, employers and workers of the ILO's, at that time 184 member States. Although non-binding, the Recommendation asserted the commitment to guarantee at least a basic level of social security for all, while aiming at higher levels of protection and adequacy of benefits in line with other more advanced social security standards. It was certainly a very important breakthrough and achievement, but it was never the final goal. So, what comes next?

Conclusions

The importance of international standards is a cornerstone of a global policy consensus, as they are a key instrument in realizing the human right to social security for all. In an article published in a special issue of the "International Social Security Review",

⁶⁶ M. Cichon, K. Hagemejer, Changing the Development Policy Paradigm: Investing in a Social Security Floor for All, "International Social Security Review" 2007, Vol. 60, Issue 2–3, p. 182, http://onlinelibrary.wiley.com/doi/10.1111/j.1468-246X.2007.00275.x/pdf (18.7.2023).

⁶⁷ Social Security for Social Justice..., op. cit.

⁶⁸ Social Protection Floor Advisory Group, Social Protection Floor for a Fair and Inclusive Globalization, A Report of the Advisory Group Chaired by Michelle Bachelet and Convened by the ILO with the Collaboration of the WHO, Geneva 2011, http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/ wcms_165750.pdf (18.7.2023).

it was asked whether a six-page document can really change the course of social history. The answer was, of course, that to achieve the objectives of the Recommendation many things must happen. The global coalition of international organizations and civil society had to be expanded to effectively push for: a) social protection to be included into the international accepted development goals' agenda (this was achieved in 2015, when social protection, including floors, became part of SDG goals and policy toolkit), b) a global social protection fund or similar international funding mechanism to be agreed on and implemented, c) a binding international instrument in the form of either a UN or ILO Convention (still debated) to be adopted, and d) at the country level, trade unions and civil society should build national coalitions and use the Recommendation to actively fight for establishing social protection floors and achieving universal coverage.

The Recommendation 202 was adopted thanks to the change in internal ILO processes, but also because of the change in the international environment.

First, many other international organizations became – during the first two decades of the century – major new players in advising and supporting low- and middle-income countries in developing social security programmes and systems. The World Bank, UNICEF and a number of other organizations published their first comprehensive social protection strategies in 2012 or after. Also, one can witness growth in the importance of advising lower income countries on the part of international NGOs (i.e., Save the Children, HelpAge International, Oxfam and many others) and their shift from purely humanitarian assistance interest to regular social protection.

Second, the aftermath of the global economic and financial crisis in 2007–2009 (similarly like the COVID-19 pandemic more than ten years later) stimulated many countries to expand (often only temporarily) their social protection programmes and for many donor countries the support of social protection in developing countries became one of the priorities (OECD Development Assistance Committee adopted their statement on the importance of social protection in 2009).

Third, rapid increase in the number of international organizations active in Global South countries and elsewhere in the field of social protection, caused the growing pressure from the donor countries on those international organizations to avoid competition (which is rather a natural phenomenon as these organization compete for limited resources which come from the donor countries) and rather enhance cooperation. This led to the establishment of the Social Protection Interagency Collaboration Committee (SPIAC-B). Many donors are now ready to fund projects on the condition that these are executed by a collation of two or more international organizations. Also, within the UN, for a few decades, there is an attempt to save resources and ensure coherence within

⁶⁹ M. Cichon, The Social Protection Floors Recommendation, 2012 (No. 202): Can a Six-Page Document Change the Course of Social History?, "International Social Security Review" 2013, Vol. 66, Issue 3–4; https://doi.org/10.1111/issr.12017. See also: M. Cichon, Let Us Walk the Talk..., op. cit., pp. 31–34.

⁷⁰ USP2030, Together to Achieve Universal Social Protection by 2030 (USP2030) – A Call to Action, Global Partnership for Universal Social Protection, 2019, https://usp2030.org/ (18.7.2023).

the whole system and act as "one UN" (not always easy as many of these organizations have quite different mandates and often report to) different constituencies. In practice, it means that in every country there is one UN organization designated as the leading one and expected to coordinate the activities of all the other organizations involved. In many countries in the Global South, in social protection it is, for example, often UNICEF, as it has field offices nearly everywhere and the ILO does not.

While inter-agency close cooperation is certainly good for efficiency concerns and "value for money" spent by the donor countries, the problem is that the ILO as an organization has features which make it very different from other organisations: one is the body of international labour standards which the organization must promote and defend (unless its tripartite structure decides to revise it), the second is the tripartite governance structure, unique to the UN where countries are represented only by specialized government departments.

Social Protection Floors Recommendation is fully following the whole body of principles of international social security standards, including Convention 102. It complements the Convention and other up-to-date standards in a number of respects. It brings back from the recommendations of 1944 poverty prevention and eradication as its main objective and priority. It brings universality of protection as an ultimate objective – although this can be only achieved gradually. It required countries to look at social protection and a comprehensive and coordinated system encompassing different types of schemes (social insurance, social assistance and others).⁷¹

The problem is that why now we have many international organisations supporting the objective of "universal social protection", there is not necessarily agreement concerning the definition of universality, the methods and pace for achieving it. Many of the current partners (including funding donors) of the International Labour Office in implementing various social protection country projects are not necessarily paying too much attention to some of the principles embedded in Recommendation 202. For example, while the Recommendation and other ILO social security standards do not exclude means-testing as a method to deliver social assistance to the poor and vulnerable, in many countries many donor funded projects support the development of targeting methods which avoid the necessity to rely on qualified social workers (which these countries cannot afford) by relying on all kind of algorithms or "proxy" targeting and on introducing national

⁷¹ In 2023 European Union adopted the European Council Recommendation on adequate minimum income ensuring active inclusion (http://ec.europa.eu/social/BlobServlet?docId=26076&langId=en) which explicitly "builds on and complements the ILO Social Protection Floors Recommendation, which provides guidance to countries in extending social protection coverage by prioritising the establishment of national floors of social protection accessible to all in need"(p. 8) and has an objective to "ensure a life in dignity at all stages of life" (p. 24) by, among other things, setting the minimum income support benefits at the specified adequate levels by 2030. One of the reasons for the growing importance of minimum income guarantees in EU countries is that, as a result of the wave of reforms driven mainly by concerns related to the demographic ageing, for example future pension benefit levels in many EU countries will not meet the requirements of ratified ILO and European standards but also will not prevent many pensioners from falling into poverty (see International Labour Organization, World Social Protection Report 2014/15, 2014, Box 4.4, pp. 92–93, and also consecutive Pension Adequacy Reports published by the EU Commission).

registers of the poor and vulnerable.⁷² Some of these designs do not consider the provisions of the Recommendation 202, like: paragraph 3f:

respect for the rights and dignity of people covered by the social security guarantees

and paragraph 23:

[countries] should establish a legal framework to secure and protect private individual information contained in their social security data systems.

ILO makes efforts to alert international and national partners to the provisions of the standards but for the governments and some donors, cost efficiency concerns or other priorities often prevail over the principles.⁷³ We thus end with a quote from a researcher:

[...] the recent calls for universalism represent a new interpretation of universalism that refers to individual entitlements to benefits rather than collective development, and that this global consensus was reached by constructing the norm in a way to leave room for interpretation and adaptation. However, the price of consensus is the attenuation of the norm, by allowing particularistic interpretations and by weakening the content of the right to social protection.⁷⁴

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REFERENCES

- Building Decent Societies: Rethinking the Role of Social Security in State Building, ed. P. Townsend, London 2009.
- Cichon M., *Bob Deacon and the making of sausages*, "Global Social Policy" 2019, Vol. 19, Issue 1–2; https://doi.org/10.1177/1468018119849206.
- Cichon M., Hardly Anyone Is Too Poor to Share: A Basic Level of Social Protection Is Affordable Nearly Everywhere, "Finance & Development Magazine" December 2018, No. 14–15, https://www.imf.org/en/Publications/fandd/issues/2018/12/affordabilityof-basic-social-protection-cichon (18.7.2023).
- Cichon M., Let Us Walk the Talk: The Right to Social Security and Social Protection the Case for a New International Convention, "Polityka Społeczna" 2020, Vol. 15, Issue 1,

⁷² S. Razavi, C. Behrendt et al., Building universal social protection systems for all: What role for targeting?, "Global Social Policy" 2022, Vol. 22, Issue 3; https://doi.org/10.1177/14680181221121449.

⁷³ See for example: J. Seekings, The limits to "global" social policy: The ILO, the social protection floor and the politics of welfare in Southern Africa, "Global Social Policy" 2019, Vol. 19, Issue 1–2, and idem, The vernacularisation of global rights discourses and social protection in regional African arena, "Global Social Policy" 2021, Vol. 21, Issue 2; https://doi.org/10.1177/1468018120978331.

⁷⁴ L. Leisering, *The calls for universal social protection by international organizations: Constructing a new global consensus*, "Social Inclusion" 2020, Vol. 8, Issue 1, p. 90.

- https://www.researchgate.net/publication/338711902_CENTENARY_OF_INTERNATIONAL_LABOUR_ORGANIZATION_AFTER_100_YEARS_OF_GLOBAL_SOCIAL_POLICY_WE_STILL_NEED_MORE_OF_IT_FROM_THE_EDITOR_POLITYKA_SPOLECZNA_ILO_CENTENARY_ISSUE (18.7.2023).
- Cichon M., *The Social Protection Floors Recommendation*, 2012 (No. 202): *Can a Six-Page Document Change the Course of Social History?*, "International Social Security Review" 2013, Vol. 66, Issue 3–4; https://doi.org/10.1111/issr.12017.
- Cichon M., Hagemejer K., *Changing the Development Policy Paradigm: Investing in a Social Security Floor for All*, "International Social Security Review" 2007, Vol. 60, Issue 2–3, http://onlinelibrary.wiley.com/doi/10.1111/j.1468-246X.2007.00275.x/pdf (18.7.2023).
- Cichon M., Tumwesigye D., Pal K., Léger F., Vergnaud D., Linking Community Initiatives to National Institutions: Ghana, "International Social Security Review" 2003, Vol. 56, Issue 3–4.
- Committee of Experts on Application of Conventions and Recommendations, Social Security and the rule of law. General Survey concerning social security instruments in light of the 2008 Declaration on Social Justice for a Fair Globalization, Report to the ILC, Geneva 2011.
- Committee of Experts on Application of Conventions and Recommendations, *Universal social protection for human dignity, social justice and sustainable development. General Survey concerning the Social Protection Floors Recommendation*, 2012 (No. 202), Geneva 2019.
- Committee on the Application of Standards, Discussion of the General Survey concerning the Social Protection Floors Recommendation, 2012 (No. 202), Verbatim document C.App./PV.General Survey, 2019, https://www.ilo.org/ilc/ILCSessions/108/committees/standards/WCMS_710395/lang--en/index.htm (18.7.2023).
- De Schutter O., Sepúlveda S., *Underwriting the Poor: A Global Fund for Social Protection*, New York 2012.
- Deacon B., Global social policy in the making: The Foundations of the Social Protection Floor, Bristol 2013.
- Department for International Development, *Multilateral Aid Review. Ensuring maximum value for money for UK aid through multilateral organisations*, London 2011, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/67583/multilateral_aid_review.pdf (18.7.2023).
- FIAP, Objectives, https://www.fiapinternacional.org/en/objectives/ (18.7.2023).
- Gassmann F., Behrendt Ch., Cash Benefits in Low-Income Countries: Simulating the Effects on Poverty Reduction for Senegal and Tanzania, Issues in Social Protection Discussion Paper, ILO, Geneva 2006, https://www.social-protection.org/gimi/ShowRessource.action?id=6813 (18.7.2023).
- Global Coalition for Social Protection Floors, *Civil society call for a global fund for social protection to respond to the COVID-19 crisis and to build a better future*, 2020, https://socialprotectionfloorscoalition.org/civil-society-call/civil-society-call-for-a-global-fund-for-social-protection/ (18.7.2023).

- Hagemejer K., The right to social security and its implementation: What role ILO social security standards can play? [in:] Social Security Review: Evolution of Social Security in South Africa: An Agenda for Action, eds. S. Motala, S. Ngandu, T. Hart, Pretoria 2021, https://www.social-protection.org/gimi/gess/RessourceDownload.action?ressource.ressourceId=30588 (18.7.2023).
- International Labour Office, *A Fair Globalization: The Role of the ILO*, International Labour Conference, 92nd Session, Geneva 2004, http://www.ilo.org/public/english/standards/relm/ilc/ilc92/pdf/adhoc.pdf (18.7.2023).
- International Labour Office, Can Low-Income Countries Afford Basic Social Security?, Social Security Policy Briefings, Paper No. 3, Geneva 2008, https://www.social-protection.org/gimi/RessourcePDF.action?id=5951 (18.7.2023).
- International Labour Office, Social Security for Social Justice and a Fair Globalization: Recurrent Discussion on Social Protection (Social Security) under the ILO Declaration on Social Justice for a Fair Globalization, Report VI, 100th Session of the International Labour Conference, Geneva 2011.
- International Labour Organization, Exploring the Feasibility of a Global Social Trust: Report on the Results of a Feasibility Study and the Recommendations of an Interregional Meeting of Experts (Geneva, 14–16 May 2002), submitted to the ILO Governing Body: GB.285/ESP/4, Geneva 2002, https://www.ilo.org/public/english/standards/relm/gb/docs/gb285/pdf/esp-4.pdf (18.7.2023).
- International Labour Organization, *Improving Social Protection for the Poor Health Insurance in Ghana: Final Report of the Ghana Social Trust Pre-Pilot Project*, Geneva 2005, https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---soc_sec/documents/ publication/wcms_secsoc_9357.pdf (18.7.2023).
- International Labour Organization, *Minimum standards of social security, Report of the ILC*, 35th Session, 1952; Geneva 1951.
- International Labour Organisation, *Programme and budget for the biennium 2024–25*, Geneva 2023.
- International Labour Organization, *Progress evaluation of the Global Social Trust pilot project*, Submitted to the ILO Governing Body: GB.300/ESP/5, Geneva 2007, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/----relconf/documents/meetingdocument/wcms_084171.pdf (18.7.2023).
- International Labour Organisation, Record of proceeding (7A), Reports of the Recurrent Discussion Committee: Social protection (social security): Proposed resolution and conclusions submitted to the Conference for adoption, ILC 109th Session, 2021, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_804457.pdf (18.7.2023).
- International Labour Organisation, *Report V Submitted to the 109th Session of the International Labour Conference*, Geneva 2021, https://www.ilo.org/wcmsp5/groups/public/--ed_norm/---relconf/documents/meetingdocument/wcms_780953.pdf (18.7.2023).
- International Labour Organisation, Social Security: A New Consensus, Geneva 2001, http://www.ilo.org/public/english/protection/secsoc/downloads/353sp1.pdf (18.7.2023).

- International Labour Organisation, *Social security for all: Investing in global social and economic development. A consultation*, Issues in Social Protection Discussion Paper, Geneva 2006, https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms_126210.pdf (18.7.2023).
- International Labour Organisation, Social Security for All. The Strategy of the International Labour Organization, Resolution and conclusions concerning the recurrent discussion on social protection (social security), adopted at the 100th Session of the ILC, 2011.
- International Labour Organisation, *Tripartite Round Table on Pension Trends and Reforms (30 November–2 December and 4 December 2020)*, Record of proceedings (Meeting report) (18.7.2023).
- International Labour Organization, World Social Protection Report 2014/15, 2014.
- International Trade Union Confederation, A Global Social Protection Fund Is Possible, Campaign Brief, 2020, https://www.ituc-csi.org/IMG/pdf/ituc_campaign_brief-a_global_social_protection_fund_en_v3.pdf (18.7.2023).
- Leisering L., *The calls for universal social protection by international organizations: Constructing a new global consensus*, "Social Inclusion" 2020, Vol. 8, Issue 1.
- Luis M., Who Decides? Representation and Decision-Making at the International Labour Organization, "International Development Policy" 2019, Vol. 11.
- Müller K., Contested universalism: from bonosol to renta dignidad in Bolivia, "International journal of social welfare" 2009, Vol. 18, Issue 2.
- Ortiz I., Durán-Valverde F., Urban S., Wodsak V., Reversing Pension Privatizations: Rebuilding public pension systems in Eastern Europe and Latin America, Geneva 2018.
- Pal K., Behrendt Ch., Léger F., Cichon M., Hagemejer K., Can Low Income Countries
 Afford Basic Social Protection? First Results of a Modelling Exercise, Issues in Social
 Protection Discussion Paper 13, ILO, Geneva 2005, https://www.ilo.org/secsoc/information-resources/publications-and-tools/Discussionpapers/WCMS_207725/lang--en/index.htm (18.7.2023).
- Razavi S., Behrendt C., Nesterenko V., Orton I., Bista C.P., Chaves A.R., Stern-Plaza M., Wodsak V., Building universal social protection systems for all: What role for targeting?, "Global Social Policy" 2022, Vol. 22, Issue 3, https://doi.org/10.1177/14680181221121449.
- Scholz W., The European Social Model and the International Labour Organization Origins and Transformations, "Polityka Społeczna" 2020, Vol. 15, Issue 1.
- Scholz W., Cichon M., Hagemejer K., Social Budgeting, Geneva 2000.
- Schubert B., Beware of the crocodile: Quantitative evidence on how universal old age grants distort the social assistance systems of low-income countries, "Poverty and Public Policy" 2020, Vol. 12, Issue 2.
- Seekings J., International actors and social protection [in:] Handbook on Social Protection Systems, Cheltenham 2021, https://doi.org/10.4337/9781839109119.00065 (18.7.2023).
- Seekings J., *The limits to "global" social policy: The ILO, the social protection floor and the politics of welfare in Southern Africa,* "Global Social Policy" 2019, Vol. 19, Issue 1–2.

- Seekings J., *The vernacularisation of global rights discourses and social protection in regional African arena*, "Global Social Policy" 2021, Vol. 21, Issue 2, p. 33, https://doi.org/10.1177/1468018120978331.
- Social Protection Floor Advisory Group, Social Protection Floor for a Fair and Inclusive Globalization, A Report of the Advisory Group Chaired by Michelle Bachelet and Convened by the ILO with the Collaboration of the WHO, Geneva 2011, http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_165750.pdf (18.7.2023).
- Suguru M., Behrendt Ch., Pal K., Léger F., Can Low Income Countries Afford Basic Social Protection? First Results of a Modelling Exercise for Five Asian Countries, Issues in Social Protection Discussion Paper, ILO, Geneva 2006, http://www.social-protection.org/gimi/gess/RessFileDownload.do?ressourceId=810 (18.7.2023).
- The Committee on the Application of Standards of the International Labour Conference, *A dynamic impact built on decades of dialogue and persuasion*, Geneva 2011.
- USP2030, Together to Achieve Universal Social Protection by 2030 (USP2030) A Call to Action, Global Partnership for Universal Social Protection, 2019, https://usp2030.org/ (18.7.2023).
- Uścińska G., Europejskie standardy zabezpieczenia społecznego, Warszawa 2005.
- White Ph., Hodges A., Greenslade M., Guidance on measuring and maximizing value for money in social transfer programmes, London 2013.
- World Commission on the Social Dimension of Globalization, *A Fair Globalization Creating Opportunities for All*, Geneva 2004, http://www.ilo.org/public/english/wcsdg/docs/report.pdf (18.7.2023).