



Rights-Based Social Protection in Africa

A review of approaches, challenges
and possibilities

**FRIEDRICH
EBERT 
STIFTUNG**

Zambia Office

Rights-Based Social Protection in Africa

A review of approaches, challenges
and possibilities

Jeremy Seekings
University of Cape Town

Report for the Friedrich Ebert Stiftung
May 2018

The Friedrich-Ebert-Stiftung

The Friedrich-Ebert-Stiftung (FES) was founded in 1925 as a political legacy of Germany's first democratically elected president, Friedrich Ebert.

Ebert was a Social Democrat from a humble crafts background, who had risen to the highest political office in his country. In response to his own painful experience in political confrontation, he had proposed the establishment of a foundation to serve the following aims:

- Furthering the political and social education of individuals from all walks of life, in the spirit of democracy and pluralism;
- Giving gifted young people scholarships to universities; and
- Contributing to international understanding and co-operation.

The FES, which was banned by the Nazis in 1933, and re-established in 1947, continues today to pursue those aims in all its extensive activities.

As a private cultural non-profit institution, it is committed to the ideas and basic values of social democracy.

Published and Copyright by:

Friedrich Ebert Stiftung
Zambia Office
5583 Great East Road
P.O. Box 30554
Kalundu, Lusaka
Phone: +260 211 295615/6
info@fes-zambia.org
www.fes-zambia.org

Commercial use of all media Published by the Friedrich-Ebert-Stiftung (FES) is not permitted without the written consent of the FES. Readers are encouraged to quote or reproduce material for their own publications, as long as they are not being sold commercially.

The findings, interpretations and conclusions expressed in this volume do not necessarily reflect the views of the Friedrich-Ebert-Stiftung.

**Rights-based social protection in
Africa:
A review of approaches, challenges
and possibilities**

Jeremy Seekings
University of Cape Town

Report for the Friedrich Ebert Stiftung
May 2018

Contents

Contents	vii
Acronyms	viii
Summary	ix
Acknowledgements	xi
Introduction	1
1. The coverage and reach of social protection in Africa	4
2. Rights for whom in global rights discourses?	9
3. The vernacularisation of a rights-based approach to Social protection in Africa	15
4. Neither necessary nor sufficient: Case-studies of Rights and Social protection at the national level	24
5. Explicit and implicit rights in the expansion of social protection	31
References	35

Acronyms

ALRN	African Labour Research Network
ANC	African National Congress
APSP	African Platform for Social Protection
AU	African Union
BDP	Botswana Democratic Party
CAADP	Comprehensive Africa Agriculture Development Programme (AU)
CAMSD	Conference of Ministers in charge of Social Development (AU)
DfID	Department for International Development (UK)
FAO	Food and Agriculture Organisation (of the United Nations)
FISP	Farmer Input Support Programme (Zambia)
ICESCR	International Covenant for Economic, Social and Cultural Rights
ILO	International Labour Organisation
IMF	International Monetary Fund
ITUC-Africa	International Trade Union Congress, Africa Region
MMD	Movement for Multiparty Democracy
NDP	National Development Plan
NORAD	Norwegian Agency for Development Cooperation
OAU	Organisation of African Unity
SADC	Southern African Development Community
SIDA	Swedish International Development Agency
SPIREWORK	Social Protection for Informal and Rural Workers
STC-SDLE	Specialised Technical Committee: Social Development, Labour and Employment
UNDP	United Nations Development Programme
UNICEF	United Nations International Children's Emergency Fund
WFP	World Food Programme
WIEGO	Women in Informal Employment: Globalizing and Organising

Summary

Very large ‘coverage gaps’ remain in social protection across Africa. Social protection provides some coverage for people at the top end of the income distribution (i.e. formally-employed workers, through social insurance) and (very modestly) for some people at the bottom (especially the elderly, the disabled and children, through means-tested social assistance), but very little for the very large number of people in between, i.e. the majority of the population working in the informal and rural sectors.

Gaps in coverage reflect gaps in the ideologies and discourses of social protection. The ‘global’ discourse of rights to social protection is rooted in the conditions and ideas that prevailed in Western Europe, based on the predominance of formal wage employment. The global discourse has paid little attention to the rights of working people in either the informal and rural sectors (or their dependents). The neglect of peasant farmers especially constitutes an especially important coverage gap when the global discourse of rights is applied to Africa.

The global discourse has been partially ‘vernacularised’ in Africa, including through the African Union, the work of international agencies, and the efforts of regional civil society organisations. Some aspects of the global discourse have been resisted, and others adopted, with the addition of distinctively African concerns, including strong emphases on the family (in contrast to the individual) and on responsibilities (as well as rights). The Africanised version of the global discourse of rights to social protection remains incompletely vernacularized, however, in that it remains largely silent on the rights of working people in the informal and rural economies. Gaps remain in the ideologies and discourses of social protection that prevail in Africa.

Case-studies of struggles around rights and social protection in selected countries show that the explicit acknowledgement of rights to social protection (in the sense used in the global rights-based approach) is neither necessary nor sufficient for an expansion of access to social protection on the part of citizens.

Explicit attention to the rights of workers might facilitate the consolidation of contributory programmes among formally-employed workers and their expansion to at least some informal sector workers. Explicit attention to the rights of the poor, however, runs into strong resistance from political and economic elites across much of Africa. Strategically, social protection for the poor – and for the majority of working people in the informal and rural economies – might be promoted more effectively through the use of the discourse of responsibility which is more widespread among African elites. This discourse is rooted in a conservative ideology that recognises that society has a responsibility to its less fortunate members, as long as they fulfill their responsibilities to society. It thus implicitly recognizes rights, including rights to opportunities.

The application of rights-based approaches to social protection in Africa thus requires attention to both social and economic conditions – especially the preponderance of the informal and rural sectors – and of hegemony of a conservative elite ideology. In the long-

term, that hegemony might be challenged. In the short-term, it can be harnessed, i.e. it provides an opportunity as well as a challenge.

Acknowledgements

I am grateful to the Friedrich Ebert Stiftung (FES) Zambia Office for the opportunity to think through the status of social protection in Africa, which resulted into a Scoping Paper to guide implementation of the Rights Based Social Protection Project. Much gratitude should be given to the Consultant and the research team who assisted with the initial research. Furthermore, I would like to extend my appreciation to the Steering Committee Members - WIEGO, ITUC-Africa, APSP and ARLN implementing the Rights Based Project in collaboration with FES, who gave valuable and critical comments to the study by providing critical additional information.

Finally, special thanks go to the FES Zambia management and staff for their support to facilitate production of this study. Their commitment and patient are highly appreciated.

Introduction

'[H]uman rights-talk should be historically situated and socially specific ... Any debate conducted on the level of moral absolutes or universal humanity is not only fruitless but ideologically subversive of the African masses.' (Shivji, 1989; quoted in Englund, 2006: 27)

Enthusiasm for social protection programmes has spread across much of Africa. The coverage or reach of social protection remains uneven, however, both within and between countries. In a few countries, a significant proportion of the population – and especially of the poor population – has been deemed deserving of social protection. In most countries, however, social protection programmes cover or reach only a small or even very small proportion of the population. Even in countries with more extensive systems of social protection, some groups of people are not covered. South Africa has the highest coverage in Africa, yet makes no direct provision for its very many unemployed, working-age adults. Botswana also has extensive coverage, yet does not support all poor parents with children. Some of the models of reform turn out, on close examination, to be much less impressive than they initially appeared. 'Coverage gaps' remain both wide and deep, and benefits are often parsimonious.

The persistence of large 'coverage gaps' does not reflect an absence of proposals. In most, perhaps all African countries, governments have rejected proposals to expand social protection that their advocates – including major international organization – have argued are not only necessary but are also affordable.

One possible strategy to address these persisting coverage gaps is to emphasise *rights* to social protection. In this view, if national governments can be persuaded, cajoled or shamed into recognizing their citizens' rights to social protection, then citizens will be empowered in demanding and securing the implementation of social protection programmes. In the medium-term, citizens themselves might demand more from their leaders, especially where leaders are elected.

International agencies (including the International Labour Organisation [ILO] and UNICEF), government agencies (such as the UK's Department for International Development [DfID]), global NGOs (including HelpAge International) and their local allies within Africa have advocated the specification of social protection as a right, meaning that individual citizens should have constitutional or other legal rights to claim from their states sufficient benefits, whether in cash or in kind, to allow them to meet a minimum set of needs. It is argued that such rights should be universal, that there should be no discrimination in the selection of beneficiaries and the payment of benefits, except perhaps on the basis of need through targeting. Even targeting should be used sparingly, and states should commit themselves to the 'progressive realisation' of universal coverage without targeting. Moreover, as the then UN Special Rapporteur on Extreme Poverty and Human Rights, Magdalena Sepúlveda, put it in a strong statement for a rights-based approach, beneficiaries should be able 'to participate in the design,

implementation, monitoring and evaluation of social protection programmes' (Sepúlveda and Nyst, 2012: 59).

Such arguments have been taken up (with qualifications) by African regional organisations, including the African Union (AU). Rights to social protection are enshrined in the constitutions of several African countries, including South Africa and Kenya.

This rights-based approach to social protection has been resisted strongly. There is resistance within some international organisations (including, notably, the World Bank). More importantly, there is resistance within many national governments, across much of Africa. Moreover, even when government ministers talk about rights in public, this need not reflect any substantive commitment in reality. In 2017 we attended a public workshop where a government minister with partial responsibility for social protection read a speech that set out a vision of reforms – of both specific programmes and the overall policy framework – that suggested a clear a commitment to a rights-based approach to social protection. The previous day, in a private meeting, she articulated a very different, and much more conservative, view of what the government should and would do. Her public speech had, of course, been scripted by a junior official; the Minister may not have read it prior to the workshop and it did not reflect her private views. The public speech did not provide a meaningful indication of her government's reform programme. The 'global' discourse of rights to social protection was reflected in 'her' speech, but not in her private values and beliefs. In this particular country, social protection policy documents, mostly drafted by expatriate European consultants, promise much, but the policy-making national elite has shown little interest in legislating or implementing substantive reforms. Our research across much of Anglophone Africa suggests that this was not an isolated instance. The explicitly rights-based approach favoured by many international organisations had yet to gain much support among Africa's political elite.

The fact that there is widespread resistance among elites to explicit rights to social protection does not mean that norms and values about social protection do not matter. Arguments about rights comprise only one of several alternative sets of justifications or frames for social protection. Rights are often implicit in these alternative normative frameworks.

This report examines rights-based approaches to social protection in Africa through not only an analysis of the rights that are central and *explicit* in many of the documents produced by international agencies and organisations, but also through an analysis of the norms, values and rights that are *implicit* in the arguments put forward, often verbally rather than in documents, by regional and national policy-makers. Advocates of social protection face a difficult choice: Between a strategy focused on explicit rights, i.e. a strategy that has faced and will face widespread resistance, and a strategy focused on the rights implicit in the norms and values favoured by at least some elites. Put simply, we recommend that the champions of social protection – whether they are in international agencies and organisations based in the global North or are in Africa – might engage more fully with the relatively conservative understandings of (or approaches to) rights and obligations that prevail among policy-making elites in Africa.

This is not an original recommendation. Leading scholars in the field of the comparative study of rights recommend that the adoption locally of ideas and practices about human rights requires that they *both* ‘resonate with existing [local] ideologies’ *and* ‘reflect universal principles or standards’. This poses a dilemma for advocates of change: ‘When organizations use human rights in ways that join readily with existing issues and strategies, they are more readily accepted but represent less of a challenge to the status quo’. Studies of other parts of the world suggest that ‘framing human rights claims in local terms and adapting them to existing ideas of justice may mean abandoning explicit references to human rights language altogether ...’ (Levitt and Merry, 2009: 457-8).

This report begins (in section 1) with an analysis of the coverage and reach of social protection in Africa. We review critically the conceptualization and measurement of social protection by the ILO, the World Bank and independent scholars. Estimates of the coverage and reach of social protection – and hence of resulting ‘coverage gaps’ – vary, depending on the choice of definition of social protection, the data used to measure coverage and reach, and a series of methodological assumptions. What is clear, nonetheless, is that there are massive coverage gaps across Africa. In some respects, coverage is widespread, but parsimonious. Peasant farmers are widely protected against natural disasters (especially drought), and school children are protected against poverty through school feeding programmes. But large majorities of people across Africa face the risks of old age, illness or disability, un- or under-employment with little or no prospect of support from the state.

In section 2 we turn to the evolution of the ‘global’ discourse of rights with regard to social protection, i.e. to the explicit concern with rights on the part of international organisations. We focus on the question of ‘rights for whom?’. We consider the ways in which the rights of different categories of people – workers (and their dependents), citizens and peasants – have been addressed in the unfolding global rights discourse. We show how the global discourse of rights to social protection has evolved through concern with specific categories of people (first workers, and later ‘vulnerable groups’) whilst neglecting others (especially peasant farmers).

The third section of this report examines the ‘Africanisation’ of this ‘global’ rights discourse through the activities of the Organisation of African Unity (OAU) and then AU, regional organisations, external actors such the ILO and HelpAge International, and regional civil society structures (especially the African Platform for Social Protection [APSP]). This section notes the very limited role that African elites played in the making of global rights discourses, examines the translation of the global discourse into African regional covenants and the activities of transnational organisations.

Section 4 turns to the deployment of rights discourses at the national level within four African countries (South Africa, Botswana, Zambia and Senegal). We examine the extent to which, and ways in which, the new ‘global’ discourse of rights has been incorporated into national strategy and policy documents, and into the thinking of local elites. These cases have been selected purposively. South Africa is the case where social and

economic rights are most fully institutionalized, not only in the Constitution and legislation, but also in court cases, political rhetoric and even popular discourse. South Africa has a social assistance system that is both unusually extensive and unusually generous. Botswana also has an extensive system of social assistance, but it is parsimonious rather than generous, and the government and ruling party have long eschewed any mention of social or economic rights. Whereas South Africa has adopted a classically 'rights-based' approach, Botswana's welfare state is based on very different norms and values. Zambia and Senegal provide Anglophone and Francophone cases in which both programmes and discourses of social protection are fluid and contested.

The final section considers the strategies that might be employed in an effort to promote the further expansion of social protection and thus reduce or close coverage gaps in Africa. It considers both the rights-oriented strategies employed by a variety of civil society organisations and the possibility of engaging with the norms and values regarding social protection among national policy-making elites. This report concludes that the explicit or global approach to rights is neither necessary nor sufficient for the expansion of social protection at the national level. An explicitly emphasis on rights *can* play an important role in the expansion of social protection to fill in some of the massive coverage gaps that currently exist. But it is more likely that social protection will be expanded in the short and even medium-term through an adaptation of the global rights discourse to accommodate some of the concerns of policy-making elites within Africa. In contemporary Africa, this might mean attacking more importance to a discourse of responsibility than to an explicit emphasis on rights, and it means direct engagement with the risks facing working people in the informal and rural sectors as much as 'workers' and 'vulnerable groups'.

This is a condensed version of the full report – more than three times longer, at about 150 pages – prepared for the Friedrich Ebert Stiftung. The full report is available on request.

1: The Coverage and Reach of Social Protection in Africa

It is commonplace in studies of social protection across the world to emphasise that Africa has *not* been left out of the global movement of expansion over the past twenty or so years. The World Bank has documented the proliferation of new social assistance programmes in Africa since the 1990s (Garcia and Moore, 2012; World Bank, 2015: 10). The ILO similarly reports 'notable progress in the extension of social protection coverage' in Africa, noting that 'most African countries have made social protection a priority in their development strategies' and have adopted or are developing national social protection policies and plans (2017: 119, 131). In their foreword to a recent study of the use of evidence in policy reform, the heads of the Food and Agricultural Organisation (FAO) and UNICEF emphasised that 'virtually every country in Africa has some kind of cash transfer programme' (Davis *et al.*, 2016: v). Even in countries with poor coverage until recently, such as Tanzania and Senegal, safety net coverage is reported to have expanded rapidly in the mid-2010s (World Bank, 2017).

These same studies acknowledge that, whilst not being left out altogether, Africa is being left *behind* relative to other parts of the world. Social protection in Africa covers only a minority of either the total population or the poor. The World Bank noted in 2015 that the coverage gap among the poor was most acute in Sub-Saharan Africa, with only one in ten people in the lowest income quintile covered by social safety nets (World Bank, 2015: 1). In its most recent report, the ILO notes that ‘only 17.8 percent of the population are covered by at least one cash social protection benefit’ (ILO, 2017: 119).

This is not because of any lack of need. In Africa, contrary to global trends, the absolute number of people in poverty has actually been rising (although the poverty *rate* has fallen, slowly – Beegle *et al.*, 2016). The number of elderly people has been rising at the same time as families are less and less willing to care for them. Birth rates remain high. Across much of East and Southern Africa, AIDS resulted in rising populations of orphans. Child poverty and deprivation persist. Landlessness has fueled unemployment, especially among young adults. Chronic poverty is compounded by drought and – across much of the Sahel – war. Moreover, the non-poor also need protection for their old age and against poor health and other risks.

The international agencies ‘talk up’ progress in Africa in their enthusiasm for social protection. Since the early 2000s, one after another of the international and donor agencies that are active in Africa embraced social protection as an integral element in their approaches to development and the reduction of poverty (von Gliszczynski, 2015; von Gliszczynski and Leisering, 2016; Hickey and Seekings, 2018). The international organisations’ reports emphasise that the evidence from Africa as well as elsewhere shows that cash transfers can reduce poverty and encourage more wide-reaching ‘development’. They cite examples from Africa so as to persuade African policy-makers to emulate these models.

International organisations and their allies across Africa are right to focus on the need to persuade African policy-makers of the merits of social protection. In many countries, presidents and ministers have resisted the kinds of reforms advocated by international organisations, citing concerns over either their affordability or the ‘dependency’ on social grants that will undermine the willingness of poor people to work (see e.g. Kabandula and Seekings, 2016, on Zambia, and Ulriksen, 2016, on Tanzania). As tools in campaigns of advocacy, the international organisations’ reports should not be read as disinterested or entirely critical studies of the policy landscape. Moreover, the data on coverage presented in the reports are often preliminary and open to improvement. Whatever the precise extent of existing coverage, however, it is clear that large gaps remain: Most elderly people in Africa do *not* receive pensions; most poor children receive *little or nothing*; and peasant farming families and workers in the informal economy remain *largely uncovered*. States protect their citizens against the most extreme forms of poverty (especially famine) but do little to mitigate more routine and chronic poverty and disadvantage.

Measuring precisely the ‘coverage’ of social protection, and hence the gaps that remain, remains very difficult. The most recent detailed study of coverage is the ILO’s second *World Social Protection Report*, published in late 2017 and using data that are available

online through the ILO. The ILO uses the term ‘social protection’ to refer to what it previously called ‘social security’, i.e. both social insurance (i.e. programmes that insure workers and their dependents against specified risks, such as disability or illness, through contributions typically paid by employers and employees) and social assistance (i.e. ‘non-contributory’, tax or aid-financed programmes, usually targeted on the poor but sometimes ‘universal’ within specified categories such as the elderly). The ILO’s definition of social security focuses on *income* security in the face of specific risks, together with access to health care.

The ILO’s definition excludes several categories of programmes that are considered as social protection by other organisations or authors:

1. **Farmer support programmes:** Programmes that reduce poverty and social exclusion among farmers through stabilizing the prices of agricultural produce or raising productivity through subsidized fertilizer or other inputs; the FAO describes these as having ‘social protection functions’ (FAO, 2017: 30).
2. Many, perhaps most **workfare programmes**, i.e. programmes that support the poor conditionally on participation in public works programmes: In its 2017 *Report*, the ILO does discuss employment guarantee schemes (notably the massive Mahatma Gandhi National Rural Employment Guarantee Scheme [MGNREGS] in India) and other public employment programmes (such as the Productive Safety Nets Programme [PSNP] in Ethiopia or the Expanded Public Works Programme [EPWP] in South Africa) (ILO, 2017: 45), but it is not clear how the ILO assesses the coverage rate of public employment programmes in Africa. The World Bank reports that workfare programmes in Africa benefit at least 16 million people (World Bank, 2015).
3. Most school and other **feeding programmes**: feeding programmes in schools reach an estimated total of about 30 million children across Africa (World Bank, 2015) and many more outside of school; the number of children benefitting from school feeding programmes in Africa is probably double the number of children registered for cash transfer programmes.
4. Most emergency **famine relief**, usually delivered in kind as food aid, often through the World Food Programme (WFP): Drought, floods and other ‘natural’ disasters are the primary risks facing rural people across much of Africa; one of the most dramatic achievements of the past fifty years has been that functional states guarantee a minimal level of food security and prevent deaths through famine; during severe droughts, famine relief is sometimes provided to half or more of the population.

The ILO’s limited concept of ‘coverage’ reflects its historic preoccupation with the regulation of labour in the industrialised societies of the global North. ‘Coverage’ refers primarily to the risks against which workers (and their dependents) are insured (or ‘covered’). The ILO’s list of risks has not changed since it was set out in its 1952 Social Security (Minimum Standards) Convention: Illness, unemployment, old age, employment injury, children, maternity, invalidity and death. The ILO does *not* consider the risks of drought, swings in the prices of crops or livestock, armed conflict, or simply the risk of being limited to low-earning work. These are the risks that underpin poverty and inequality across Africa.

The ILO's *de facto* definition of social protection – government-run, cash transfer programmes that do not entail any immediate labour obligation – is much more restrictive than the definition used by the World Bank. The World Bank also understands social protection as comprising both social insurance and social assistance (or 'social safety nets'), but it defines the latter as including also programmes with benefits in kind (such as feeding schemes) and workfare programmes. Given its focus on poverty, the World Bank concentrates on social safety nets and pays less attention in Africa to social insurance. As the World Bank (2015a: 77) also notes, the concept of 'coverage' makes no sense with respect to social assistance; 'reach' would be a more appropriate term (Barrientos, 2018).

Measuring the extent of coverage or reach also requires choices about who counts as covered. The ILO generally focuses on individual, direct beneficiaries (as well as current contributors to schemes who have or are acquiring rights to future benefits). The World Bank, in contrast, generally estimates coverage or reach according to the number of people living in households where at least one person benefits from the relevant kind of programme (see World Bank, 2015: 77-9).

The overall result is that the ILO is likely to underestimate the reach of social assistance, especially in Africa, where policy-makers attach considerable importance to families, both ideologically and in the design of public policy. The definition of social protection and coverage can be very consequential. In Botswana, the ILO reports that 15 percent of the population were covered by at least one social protection programme whilst the World Bank reports that 74 percent of the population were covered. The difference between 15 and 74 percent is due to the large number of people in Botswana living in households where someone benefits from a workfare or school feeding programme.

The contrast between the ILO and the World Bank reflects the limitations of their respective datasets as well as their historically-rooted conceptual differences. The ILO relies primarily on administrative data, supplied by national governments. The World Bank relies more extensively on data from household surveys. The World Bank uses survey data more fully than the ILO because it is concerned to examine the *distribution* of benefits, and especially whether they are reaching the poor. Whereas the ILO pays no attention to precisely who gets what, the World Bank pays close attention to both 'inclusion errors' (when non-poor people benefit) and 'exclusion errors' (when poor people fail to benefit).

In its *World Social Protection Reports*, the ILO reports (absurdly precisely) that 17.8 percent of the total African population are covered in the sense of receiving (or contributing to) 'at least one social protection cash benefit'. Whilst 29.6 percent of the elderly are reportedly covered, only 15.9 percent of children and mothers with newborn babies are reportedly covered. Coverage of unemployed people is, according to the ILO, very low. The ILO reports also that public expenditure on social protection is very low across most of Africa in relation to GDP.

The precision with which the ILO reports its findings – such as ‘17.8’ percent of the population of Africa are covered by at least one cash social protection benefit – is spurious. Not only are there enormous definitional challenges, as discussed above, but the data on Africa are incomplete. Regional aggregates are calculated through the imputation of missing data. Furthermore, some of the national data reported in the ILO’s reports are nonsensical, perhaps because they were provided by national government departments that misunderstood what they were being asked. The ILO’s estimates should be treated as very broad estimates.

Some of the ILO’s conclusions need to be treated with caution. The ILO’s Reports suggest that the coverage of (and expenditure on) social protection has recently risen in Africa as a whole. The proportion of elderly people receiving social pensions, for example, reportedly rose from just over 20 percent (according to the 2014 Report) to about 30 percent (according to the 2017 Report). This rise does not seem to be consistent with national level data; the overall coverage rate is likely to be somewhere between the two figures and rising slowly. The ILO’s estimate that social protection covers 16 percent of children across Africa also seems implausible, given the ILO’s own restrictive definition of social protection. Taking only cash transfer schemes into account suggests, according to my own calculations, that reach is closer to about 5 percent; only if feeding schemes are also taken into account does it rise to 15 percent.

The ILO also reports on national coverage rates. The ILO sets the goal of universal coverage, including not only contributory schemes for the formally-employed but also universal social protection floors for the poor. Complete (100 percent) coverage would mean that everyone was protected against specified risks, and everyone who actually experienced that risk received cash benefits. In other words, everyone would be either a contributor or a beneficiary. The ILO reports that the highest overall coverage rate in Africa – i.e. what the ILO calls the ‘front runner’ – is South Africa. Even South Africa ‘is still only half way through the set indicator of universal coverage’, with coverage (by at least one programme, and including contributors as well as beneficiaries) put at 48 percent (2017: 123). The ILO estimates that effective coverage in South Africa is highest among the elderly, followed by children and the disabled; it is very low among the unemployed. Egypt and Cabo Verde were the only other two countries with effective coverage (as measured by the ILO) of more than 30 percent of the total population (although data are not available for Mauritius). Every country in Africa has enduring coverage gaps in terms of social protection programmes.

The ILO’s neglect of distributional issues – who precisely benefits from programmes – makes it difficult to compare either coverage or coverage gaps in the current context of less than universal coverage. A country could achieve (say) 20 percent coverage by targeting either the non-poor (for example, formal sector employees) or the very poor. The strength of the World Bank’s approach (and its ASPIRE database) is its emphasis on distribution, i.e. on who gets what, and especially the needs of the poor. In South Africa, many but not all poor households benefit from social assistance. In Tanzania, however, many of the benefits of social assistance (in addition to almost all of the benefits from contributory pension programmes) accrue to the non-poor.

Even the World Bank's approach to distribution provides only a partial picture of precisely who gets what. It focuses on programme beneficiaries in terms of the income distribution, i.e. of income quintiles. The World Bank does not report distribution in terms of categories of people, either within households or within income quintiles. The World Bank data do not allow us to identify distribution by gender. Nor do they allow us to see whether informal workers or peasants are covered. Overall, formally-employed workers are generally covered, at least for old age, through pension and provident funds. Poor 'incapacitated' households – i.e. households where no one is able to work – are in more and more countries the focus of social assistance programmes, whether these are targeted on categories of individuals (pensioners, the disabled) or the households themselves (for example, through the PSSB in Mozambique or the cash transfer component of the PSNP in Ethiopia and Tanzania). Peasants are covered against the risk of drought, and may benefit from farm input subsidy programmes, which are sometimes very generous. Informally-employed workers are rarely covered at all. Non-contributory pensions and other social assistance programmes are beginning to cover peasants and informally-employed workers in retirement, but regular provision for working-age adults is generally limited to workfare. In short, coverage gaps are very much wider than coverage.

2: Rights for Whom in Global Rights Discourses?

Can a rights-oriented approach help to close the wide coverage gaps that currently characterize social protection across Africa? This clearly depends on rights *for whom* and *to what*? The global discourse of human rights is not uncontroversial, not least because of its historical roots in western liberal theory with its foundational assumptions of the primacy of autonomous individuals (see, for example, Claeys, 2015). In order to close gaps in the coverage of social protection, we must first ask how the global discourse of social and economic rights has constituted the bearers of rights (rights *for whom*?) and the content of those rights (rights *to what*?).

'Human' rights constitute people, whether as individuals, families or other groups, in a variety of forms. 'Welfare regimes' across the world differ in part in whether they are oriented primarily towards *workers*, *peasants*, *paupers* or *citizens*. The global social and economic rights discourse evolved through the privileging of some of these categories over others.

From the late nineteenth century, the predominant discourse of social and economic rights focused on workers, and many welfare regimes were 'workerist', focused primarily on the incorporation of industrial and urban workers through the institutionalization of an 'industrial' form of citizenship. An alternative discourse, rooted in European Christian religious thought, focused on the 'social' rights of the poor, or paupers, whether to charity or the support of the modern state. Following the Second World War, north European welfare states institutionalized the kind of 'social' citizenship imagined by T.H.Marshall. At the same time, across most of colonial Africa and South Asia, states constructed

agrarian welfare regimes, focused on peasant farmers, whose rights were imagined in terms of a 'traditional' agrarian order. More recently, arguments that citizens have a right to a fair or rightful share in national (or global) prosperity have fueled campaigns for basic income grants and similar proposals.

The relative importance of these different categories of rights-holders reflects both the diverse currents in the history of ideas and the social and economic realities of different societies. Workerist conceptions of rights (and workerist welfare regimes) developed in response to industrialization and the risks that accompanied this. Pauperist conceptions of rights were fueled by concern with the people left behind by industrialization. Agrarian rights and regimes characterized societies dominated by peasant farmers, or at least where elites imagined that the peasantry might be revived. Deepening landlessness, 'deagrarianisation' and urbanization in the late twentieth and early twenty-first centuries undermined the relevance of agrarian welfare regimes. Each of these types of welfare regime focuses on a different category of people, protects them against a distinctive set of risks, imagines a distinct ideal society, and is justified through a specific set of norms, values and beliefs. Rights discourses have evolved in relation to these diverse risks, ideals and norms.

In the decade since the mid-2000s, a 'global' discourse of rights to social protection has become prominent. This discourse revolves around the concept of the 'social protection floor', championed initially by the ILO but later embraced also by diverse other international agencies. Backed by a powerful array of international organisations, this discourse has become hegemonic at the global level. It has also been resisted, by diverse actors including both peasants in Central America and political elites across much of Africa. In important respects, the global discourse represents a compromise between the two strands of thought about social and economic rights that have predominated in Western Europe for almost a century, i.e. between *industrial* and *social* forms of citizenship. The social protection floor institutionalized this compromise through its combination of 'horizontal' and 'vertical' elements (i.e. social assistance for citizens and social insurance for workers respectively). The global discourse is rooted in the assumptions about rights-bearing individuals that underpin both industrial and social forms of citizenship. It pays little or no attention to alternative conceptions of citizenship, including especially the ideas about collective rights that underpin agrarian forms of citizenship.

The 1948 Universal Declaration of Human Rights is widely cited as the foundational statement of social and economic rights (e.g. von Gliszczynski, 2015: 160). Whilst primarily concerned with civil and political rights, which had obviously been violated flagrantly during the Second World War, the Declaration included also some social and economic rights. Article 22 of the Universal Declaration proclaimed that 'everyone, as a member of society, has the right to social security'. The reference here to 'social security' encompassed, at least potentially, social assistance as well as social insurance. In practice, however, the Universal Declaration was drafted at a time when social security was generally understood in terms of protecting male breadwinners in waged employment

– primarily against the risk of being unable to work for wages on the basis of age, infirmity or illness – and women and children as their dependents.

The thinking reflected in the Universal Declaration was shaped by the ILO's earlier 'conventions' and 'recommendations' as well as thinking in imperial governments (notably Britain) as to who should get what through social security. The prevailing assumption was that most people in Africa (and some other parts of the global South) were protected against risks by their 'independent' agricultural production and their 'traditional' institutions ('the expanded family, the clan, the village and the tribe'). In this view, African peasants did not need 'social security'. The priority for (colonial) governments was to expand production (through 'development') and to preserve the traditional institutions of agrarian society. Development thus served as the substitute for the kind of 'social citizenship' imagined by T.H. Marshall. The imagined rights in the Universal Declaration were not the rights of peasant farmers in 'developing' areas.

The 1950s, 1960s and 1970s were the era of 'development'. The ILO did adopt, in 1952, a Social Security (Minimum Standards) Convention (no. 102) setting out minimum standards for provision against the risks of poor health, disability and death, unemployment and old age, as well as family benefits. These minimum standards were supposed to be globally applicable. Despite its narrow focus on waged employees and provision for exemptions, the Convention was ratified by very few countries. Social security, as understood by the ILO, was considered of limited relevance in developing areas across the global South.

The UN also sought to deepen commitments to rights but did so with a limited vision of the kinds of livelihoods and risks that predominated across the global South. The 1966 International Covenant on Economic, Social and Cultural Rights (ICESCR) also focused primarily on employment-related social insurance. Even these rights were qualified: Each signatory state committed to 'take steps ... to the maximum of its *available resources*, with a view to achieving *progressively* the full realization of the rights recognized in the present Covenant by all *appropriate means* ...' (emphasis added). African countries hardly rushed to ratify the Covenant: Only four countries did so prior to 1990 (Kenya, Tanzania, Zambia and Uganda). Ghana only ratified it in 2000 and South Africa in 2015. Neither Botswana nor Mozambique have ever signed or ratified it.¹

The prevailing assumption that these rights only affected the rural poor (and the growing population of urban poor) insofar as 'development' pulled them into formal employment meant that this emerging global rights framework confronted neither of the two major challenges facing Africa. First, droughts (and floods) posed perhaps the most serious risk to the livelihoods of poor people in Africa. Whereas European welfare states were primarily concerned with protecting workers against the risks of an industrial economy, colonial and post-colonial states in Africa were compelled to confront the risks associated with agrarian societies, especially the risk that regional drought would cause a collapse in food production and the decimation of livestock herds, overwhelming the capacity of kin or community to support the destitute. Colonial authorities often intervened

¹ According to Wikipedia.

inadequately and too late, but post-colonial governments faced much more intense pressure. Botswana, which achieved independence during the worst drought in living memory, pioneered drought relief and recovery programmes, in association with the newly-formed World Food Programme (Seekings, 2016). The new government of Botswana not only guaranteed in practice a right to food security of most of its citizens, but also formulated an ideology that recognized this implicit right through the concept of responsibility (discussed further below). The institutionalization of drought relief and recovery programmes across most of Africa between the 1970s and 2000s represented an extraordinary expansion of social protection and (implicit) social rights, albeit not along the lines of the global discourse employed by organisations based in the global North. In addition, it was becoming clear that in practice development was failing to pull many poor people into the formal, 'modern' economy. Rural (and urban) poverty persisted. The global discourse of social and economic rights – as propagated by the ILO – looked more and more like the protection not of the poor but of a semi-privileged 'labour aristocracy'. In the 1970s, the ILO deepened its efforts to promote poverty-reducing development or growth paths.

It became even more difficult to ignore distribution when structural adjustment programmes were implemented in the face of debt crises. The position of children received particular attention. In 1987, UNICEF focused on the position of children in its critical response to structural adjustment, *Adjustment with a Human Face* (Cornia, Jolly and Stewart, 1987). Two years later, the UN adopted the Convention on the Rights of the Child. This recognized, inter alia, the right of 'every child ... to benefit from social security, including social insurance' (Article 26) and 'to a standard of living adequate for the child's physical, mental, spiritual, moral and social development' (Article 27). The phrasing reflected the earlier ICESCR and reflected a similarly limited understanding of livelihoods and risks. Nonetheless, the belief that social protection was a privilege that was or would be consequential to development, not a right to be claimed before or alongside it, began to be challenged.

The decades-long preoccupation with growth and development was further challenged in the late 1990s. First, in 1996, the FAO hosted in Rome a massive World Food Summit. Then, the following year, UN Secretary-General Kofi Annan called on all UN agencies to incorporate human rights into their work. In 2003, UN agencies agreed on a 'UN Statement of Common Understanding on Human Rights-Based Approach to Development Cooperation and Programming' (the 'Stamford Common Understanding'). This stated that, first, 'all programmes of development co-operation, policies and technical assistance should further the realisation of human rights as laid down in the Universal Declaration of Human Rights and other international human rights instruments'. Secondly, these human rights should 'guide all development cooperation and programming in all sectors and in all phases of the programming process'. Thirdly, development cooperation should build capacities among states (and non-state 'duty-bearers') to meet their obligations and among rights-holders to claim their rights.²

² See <http://hrbaportal.org/the-human-rights-based-approach-to-development-cooperation-towards-a-common-understanding-among-un-agencies>.

The ILO soon assumed a leading position in developing a new approach. In an important early contribution, van Ginneken (1999: 3) wrote that ‘the ILO had traditionally expected that all workers would sooner or later end up in secure formal sector employment’. This assumption had justified the ILO’s focus on the rights of workers in formal employment and on development strategies that would expand the formal sector. In recognising that there was in practice very limited scope for extending the reach of existing contributory institutions, van Ginneken exposed the inadequacy of the ILO’s existing approach. The coverage of contributory programmes might (he suggested) be extended from 10-25 percent of the working population (and their dependents) by an additional 5-10 percent of the working population, but not further. If the ILO was to concern itself with the rights of the poor, they must look beyond contributory programmes. Van Ginneken recommended a multi-pillar approach to social protection: Existing contributory schemes might provide for between 10 and 30 percent of the population; new (and largely unspecified) contributory schemes might provide some additional coverage; but tax-financed social assistance and other schemes would be required to provide for the poorest 30 percent of households. This line of thought led to the ILO later launching a ‘Global Campaign on Social Security and Coverage for All’ and later still developing the concept of the social protection ‘floor’, i.e. a set of programmes that would guarantee a minimum level of provision across all stages of the life-course. Following the financial crisis, other UN agencies joined in the call for social protection floors.

In 2012 the ILO adopted Recommendation no. 202 on Social Protection Floors. Michel Cichon – who as director of the ILO’s Social Security Department from 2005 to 2012 played a central role in the social protection floor initiative (Deacon, 2013) – gushingly described Recommendation 202 as ‘a “Magna Carta” of social protection’ (Cichon, 2013: 37) – referring to the charter of 1215 in which the then King of England recognised that his subjects had civil and political rights. The ILO Recommendation opened with a preamble that reaffirmed ‘that the right to social security is a human right’. Social security was also developmental, ‘an important tool to prevent and reduce poverty, inequality, social exclusion and social insecurity, to promote equal opportunity and gender and racial equality, and to support the transition from informal to formal employment’, and a useful macroeconomic tool to counter recession. The Recommendation did not, however, mark as complete break with the ILO’s approach hitherto. For the ILO, the social protection floor initiative was linked to its broader strategy around ‘decent work’. Including the *horizontal* floor (comprising social assistance) meant that the ILO could sidestep criticisms that it was only concerned with non-poor workers in formal employment. At the same time, the ILO was able to move forward with the social protection floor only because the trade unions (forming one arm of its tripartite structure) were satisfied that the establishment of a horizontal floor was a complement not a substitute for the *vertical* strengthening of social protection through the protection and expansion of contributory schemes. Not long after, in June 2015, the ILO approved another Recommendation – the Transition from the Informal to the Formal Economy Recommendation (number 204) (ILO, 2015) – that focused on the formalization of employment. This was more directly in keeping with the ILO’s long-standing workerist agenda.

The UK's Department for International Development (DfID), which played an especially important role in Africa, also championed a rights-based approach to development in general and social protection in particular. HelpAge International, which played a leading role in promoting the interests of elderly people in the absence of any dedicated UN agency equivalent to UNICEF, also embraced a rights-based approach to 'social'- i.e. non-contributory – pensions. Later, UNICEF followed suit with respect to children's rights to social protection.

The heightened stature of social protection on the global agenda was reflected in its privileged position in the SDGs, agreed in 2015, in stark contrast to the complete silence on social protection in the earlier MDGs. The SDGs included a dedicated target on social protection (SDG 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'. Social protection was also mentioned explicitly in SDGs 5 (Achieve gender equality, empower all women and girls) and 10 (Reduce inequality within and among countries).

This revival of a global rights discourse in the early 2000s focused on the rights of workers, perhaps including informally-employed workers as well as those in formal employment, and especially vulnerable groups of citizens. One group that was absent from the discussion was peasants. Yet, even at the end of the twentieth century, more than half of the world's hungry population were peasant farmers, i.e. smallholders growing crops and raising livestock primarily for subsistence, sometimes for sale (Ziegler *et al.*, 2011). Peasants were excluded from the rights agenda because they continued to be defined as a challenge for 'development' rather than 'welfare'. Food-related rights began to attract more attention following the FAO's 1996 World Food Summit. The ensuing (Rome) Declaration on World Food Security reaffirmed 'the right of everyone to have access to safe and nutritious food, consistent with the right to adequate food and the fundamental right of everyone to be free from hunger' (quoted in Claeys, 2015: 69). The UN appointed for the first time a Special Rapporteur on the right to food. But, the Special Rapporteur later wrote, 'it soon became clear that little action was being taken with respect to the 1996 commitments' (Ziegler *et al.*, 2011: 6).

Whilst the UN and FAO were talking rather ineffectively about the right to food, peasants themselves in some parts of the global South were mobilising around the more radical demand for the right to food 'sovereignty', i.e. the right to produce food rather than a right to food. Pressure for the UN to adopt a declaration on the rights of peasants has been driven primarily by the transnational peasants' movement La Vía Campesina, which itself adopted a declaration on the rights of peasants in 2008. The prospective right to food sovereignty challenges the West-centric character of most 'human rights' (Durnford, 2016). La Vía Campesina's campaigns attracted the attention of the Advisory Committee to the UN Human Rights Council, which has proposed a formal UN declaration on the rights of peasants (Durnford, 2016: 68-9; Claeys, 2015: 58-9).

Small farmers were sometimes important actors on the stage of welfare state-building in the global North in the early and mid-twentieth century. In the USA, as Prasad (2012) has

argued, the political power of family farmers resulted in widespread state intervention in the economy, not through a European-style welfare state but through consumer protection, economic protection and progressive taxation. The reconstruction of a welfare state in the 1930s, through the New Deal, was achieved in part by mobilising agrarian discourses, images, policies and rights (Dauber, 2013). In Europe, the construction of social democratic welfare states in Scandinavia resulted from a coalition between the parties representing industrial workers and those representing small farmers. The political power of small farmers helps to explain both the initial emphasis on social assistance in the Nordic welfare states and their subsequent universal egalitarianism (Luebbert, 1984; Esping-Andersen, 1985). In Africa, peasant farmers played leading roles in many of the nationalist movements of the 1950s, but thereafter were generally marginalised politically in one-party states that sought to tax rural producers to finance development and were more anxious about the political threat posed by urban populations. The rural population often had the power to demand drought relief – and to reward governments that provided it (most notably in Botswana) – but peasants generally lacked both the political power (within the state) and economic power (in markets) of their Scandinavian or American counterparts in earlier decades. International agencies such as the FAO may have been caught up in the rising enthusiasm for social protection and for rights-based approaches generally (FAO, 2017) but there has been little pressure from within Africa.

Across approximately one century, from the early Twentieth Century to the early Twenty-First Century, the global discourse of rights to social protection has evolved, but it has never escaped entirely from its workerist origins in the industrialised societies of north-west Europe. In the ‘developing’ areas of the global South, small groups of non-poor workers might have rights, but the urban and rural poor were instead promised development. Even in the late 1990s and 2000s, amidst an expansion of interest in the rights of poor people, the rights of peasant farmers were almost entirely neglected. The global discourse of rights is yet to encompass explicit rights for everyone.

3: The ‘Vernacularisation’ of a Rights-Based Approach to Social Protection in Africa

The ‘global’ discourse of rights to social protection developed with, at most, a marginal contribution from African governments, civil society or individuals. As Ishay puts it, it is the ‘Western concept of human rights that has prevailed’ (2004: 7). Prior to the 1960s, Africans were generally represented in ‘global’ fora (including the ILO and UN) by the colonial powers. The Universal Declaration of Human Rights was drafted primarily by Europeans and North Americans. Even the ICESCR, although passed in 1966, had been mostly drafted *before* most African colonies achieved independence and were admitted into the United Nations. It was left to anthropologists to object to the Universal Declaration, querying how it could be ‘applicable to all human beings’ when it was ‘a statement of rights conceived only in terms of the values prevalent in the countries of Western Europe and America’ (American Anthropological Association, cited in Merry, 1997: 33-4). After independence, African countries participated in in the global fora where rights were

discussed but generally failed to wield influence commensurate with their numbers. The global institutions continue to be dominated by players from the global North, and the global rights discourse remains one rooted in the history and culture of north-west Europe.

Deliberation over social and economic rights within Africa has therefore generally entailed the ‘localisation’ or ‘vernacularisation’ of the ‘global’ discourse, with modest modifications to take into account some of the attitudes and beliefs of African policy-making elites. Growing numbers of African scholars have criticized aspects of the global rights discourse, arguing that ‘the individualist, narrow formulation of human rights is ill-suited to the African political and cultural universe’ (Mutua, 2002: 68). But African regional fora have often been sponsored financially and ‘supported’ technically by ‘global’ – i.e. Northern-dominated – institutions, so that ‘African’ declarations represent an uneasy combination of external and African preferences. The one dimension of the global rights discourse that was driven by activists in the global South – the call for the acknowledgement of the rights of peasants (or for ‘food sovereignty’) – has received weak support from within Africa, despite the large numbers of peasants across the continent.

The general criticism of the global rights discourse is that it has been overly individualistic and under-emphasizes duties. Mutua writes that:

‘... the current human rights movement must be understood as only a piece of the whole. Its roots in Western liberal thought and tradition necessarily deny it completeness, though not the universality of many of its ideals and norms. To paraphrase the famous metaphor, the gourd is only partially filled by the Western tradition; it falls on other traditions fully to fill it.’ (Mutua, 2002: 70).

For Mutua and others, the language of duty is integral to African conceptions of ‘rights’. Individual rights not only coexisted with but were bound up with corporate responsibilities and obligations. Social and economic change may have encouraged individualism, but communitarian ideals have been eroded and transformed rather than entirely displaced. This conception of rights and duties has major implications for social protection.

The foundational document on rights in Africa was the African Charter on Human and Peoples’ Rights (or ‘African Charter’), adopted by the then Organisation of African Unity (OAU) in 1981 in Banjul (and hence sometimes called the Banjul Charter). The Charter was adopted ‘partly due to *external* pressure on African governments to establish a regional human rights regime and partly as a response to the gross human rights violations committed by some African leaders’ (Chirwa, 2005b: 323, emphasis added). Hitherto, African governments had tended to view human rights with suspicion, often justifying their ambivalence in terms of the priority or imperative of economic development (Howard, 1983). With strong support from his President, Leopold Senghor, the Senegalese judge Kéba Mbaye led a team that drafted the Charter, and other African governments desisted from further obstructionism (Lindholt, 2001: 75-78; Baricako, 2008).

The African Charter was ‘distinctive in its attempt to append an African “fingerprint” on the human rights discourse’ (Chirwa, 2005b: 323; see also Mutua, 2002). At the outset, Senghor had urged Mbaye’s team ‘to draw inspiration from African traditions, bearing in

mind the values of African civilization and the real needs of Africa'. He urged them to recognize that rights must be balanced with duties (quoted in Baricako, 2008: 6). The African Charter recognized some social and economic rights, for workers and vulnerable groups (women, children, the aged and the disabled), as well as a general right to development. It did not mention social security nor a right to food. The Charter emphasised values (including traditional values) and the family (as 'the custodian of morals and traditional values recognized by the community') as well as duties towards families, society and state.

The rights of specific vulnerable groups – children, women, the elderly and disabled – were revisited later. The 1990 African Children's Charter did not refer to social protection explicitly and placed the primary responsibility for children's welfare on their parents, but it did enjoin states to provide 'material assistance and support programmes particularly with regard to nutrition, health, education, clothing and housing' (Sloth-Nielsen, 2016: 159). The Children's Charter was 'Africanised' in one respect: It included a section dedicated to the responsibilities of children that borrowed entire clauses from the African Charter.

The 2003 Protocol to the African Charter on the Rights of Women in Africa ('African Women's Protocol'), adopted by the newly-formed AU, provided a strong statement against discrimination against women and an endorsement of women's reproductive rights. The Protocol was cautious on 'economic and social welfare rights', however, focusing primarily on discrimination against women in employment. The Protocol went further than the African Charter on social and economic rights in only three respects. First, it called on states to 'create conditions to promote and support the occupations and economic activities of women, in particular, within the informal sector' and to 'establish a system of protection and social insurance for women working in the informal sector and sensitise them to adhere to it'. Secondly, it also specified a right to food security, including access to the land needed to produce food. Thirdly, it did *not* include any praise for African culture or values. On the contrary, the Protocol called for 'the elimination of harmful practices' and for a 'positive cultural context'. In contrast to the African Charter, the Protocol barely mentioned the family, never mentioned duties, and mentioned responsibilities only in the context of children being the shared responsibility of both parents. The Women's Protocol did not have the conservative features of the African Charter and Children's Charter.

The 2016 Protocol on the Rights of Older Persons pointed to the need for both contributory and non-contributory (universal) programmes to ensure income security. It stipulated that states should encourage families to support their elders, whilst also ensuring that older people have the option of residential care. The Protocol was more respectful of existing culture than the Women's Protocol had been. It referred to 'the virtues of African traditions, values and practices which should inspire and characterize the provision of mutual social and communal care and support; respect for older members of society and the passing of knowledge to younger population groups'. At the same time, it denounced 'harmful traditional practices including witchcraft accusations, which affect the welfare, health, life and dignity of Older Persons, particularly Older women'. Like the

African Charter, and unlike the Women's Protocol, it discussed the duties or responsibilities of older people, primarily to mentor younger generations.

These OAU/AU statements about rights entailed the partial 'Africanisation' of the global discourse. The family was revered (although less so in the African Women's Protocol) and duties stressed, but there was no discussion of the rights of peasants (or small pastoralists) or the rural and urban poor, i.e. the people most vulnerable across most of Africa. In terms of both design and implementation, these documents contain glaring gaps.

Social protection has also been discussed regularly within various AU fora: its tripartite Labour and Social Affairs Commission (LASC) from 2003, its Conferences of Ministers in charge of Social Development (CAMSDs) every two years from 2008; its Specialised Technical Committee for Social Development, Labour and Employment (STC-SDLE) which replaced the LASC and CAMSDs from 2015; and in ad hoc meetings, including intergovernmental conferences on social protection in 2006 in Livingstone (Zambia) and Yaoundé (Cameroon). These deliberations resulted in statements of commitment to social protection, especially the 2008 Social Policy Framework for Africa and the 2015 'Addis Ababa Declaration' (on Social Protection for Social Development). There has also been discussion of an additional Protocol (to the African Charter) on the Rights of Citizens to Social Protection and Social Security, but this remains at the draft stage.

These meetings provided an opportunity for international organisations and local NGOs to keep questions of rights on policy-makers' agenda. Given that much of the initiative came from international organisations and allied local NGOs, it is not surprising that deliberation in these meetings has focused on the groups of primary concern to those organisations, i.e. workers and vulnerable groups. The AU has generally continued to privilege development, and to view social policy as an important but minor component of overall development strategy. The tension was evident with respect to the first STC-SDLE meeting, in 2015, on the theme of 'Social Protection for Inclusive Development'. The preparatory documents emphasized that social protection was an investment in future development, and barely referred to rights, whilst the ensuing 'Addis Ababa Declaration' called on signatories to adopt a 'rights-based approach to social protection and social security for our citizens, aiming at inclusive development that leaves no one behind'.

Pushed by international organisations and NGOs, and by their own expectations of modernist development, the AU also considered further the rights and position of informal workers. The AU adopted a Programme of Upgrading the Informal Economy (in 2010) and then a Social Protection Plan for the Informal Economy and Rural Workers (SPIREWORK) (in 2011). SPIREWORK represented a compromise between the ILO, which pushed the idea that the formalisation of the informal sector (as part of its broader strategy focused on 'decent work') was integral to solving the challenge of poverty in Africa, and the AU (and individual African countries) which pushed for employment creation ('job-rich and inclusive growth'), especially for young people. SPIREWORK pointed vaguely to community-based insurance schemes. It acknowledged the possibility of non-contributory programmes, but without any evident enthusiasm. The AU began to

refer to a target of extending coverage to 20 percent of the informal sector, although it was never clear whether the informal sector here meant informally-employed wage workers or included also self-employed peasants, urban traders, and so on. In any case, this target was not only modest but was also unrealistic without large-scale non-contributory programmes.

The AU's deliberative structures, like its formal declarations, recognize the social and economic rights of selected categories of vulnerable people and the role of social protection in this. But AU institutions continue to operate on the assumption that the role of social protection is to fill the gaps when people cannot support themselves through formal or informal employment. There has been little consideration of either the needs or rights of either peasant farmers or the urban self-employed.

Within Africa, sub-regional organisations have also turned to social protection. The two primary sub-regional organisations have been the Southern African Development Community (SADC) and the Economic Community of West African States (ECOWAS). ECOWAS has been largely concerned with trade and economic integration, and more recently with political stability; it does not seem to have a track record of interest in labour market and social policy. SADC, in contrast, has an interest in social policy, perhaps because of the long history of extensive cross-national migration within what has become a very regional economy.

SADC's first statement on social and economic rights was unambiguously workerist, showing the fingerprints of the ILO. The 2003 *Charter of Fundamental Social Rights in SADC* emphasised the regional harmonisation of labour market policies. Article 10, on social protection, required that SADC governments 'create an enabling environment so that every *worker* in the Region shall have a right to adequate social protection and shall, regardless of status and the type of employment, enjoy adequate social security benefits', whilst '*persons* who have been unable to either enter or re-enter the labour market and have no means of subsistence shall be entitled to receive sufficient resources and social assistance' (SADC, 2003, emphasis added).

Three years later, SADC agreed on a *Code on Social Security in the SADC* (SADC, 2007). Article 4 boldly affirmed that 'Everyone in SADC has the right to social security'. In comparison with the 2003 Charter, the 2007 Code was much more inclusive. Although its focus remained strongly on social insurance, it did envisage extending coverage to people who were not formally-employed waged workers. In 2014, SADC adopted an Employment and Labour Protocol that set out the rights of workers. The Protocol both reiterated the narrow emphasis of the 2003 Charter and called for social protection floors that provide 'meaningful coverage for everyone'. Whilst SADC has held up a vision of universal coverage, no part of the SADC structure appears to have any clear responsibility for social protection for those people who are neither 'workers' nor the elderly or other deserving poor.

Yeates (2017) points to the European Union as an example of how regional social policy can serve as a mechanism for promoting policy reform at the national level. With respect

to social protection, regional organisations typically produce 'road maps', or 'declarations of intent'. These can be important, symbolically and practically, acting as precursors of more substantive reform. In the case of the European Union, however, regional policy was soon backed by a degree of legal force, and was driven in part by strong and well-resourced regional institutions. SADC does not have comparable resources. It is not clear that it has significant influence on national policy-making.

International organisations, including the ILO, played a major role in pushing the AU and SADC to take seriously social and economic rights, including rights to social protection. The ILO's vision of rights has formally become an inclusive one, i.e. including not only all working people but also all citizens through social protection floors. In practice, the ILO frequently lapses into an assertion of the primacy of workers' rights. Its work in Africa has focused primarily on the promotion of 'decent work' and the formalization of informal employment. Social protection has generally been seen as an addition to other workers' rights.

The challenge facing the ILO in Africa is that the character of 'informal employment' in Africa is very different to its character in some other parts of the global South. In Africa, with the exception of South Africa, informal employment comprised mostly self-employment (primarily on farms) and constituted about 90 percent of all employment, as the ILO itself recognizes (e.g. ILO, 2009). In Tanzania, in 2005, formal employment accounted for only 6 percent of total employment. Almost two-thirds of total employment comprised peasant farmers working on their own land. Most of the rest comprised self-employment or unpaid family work. Non-family informal employment accounted for only about 3 percent of total employment (*ibid*: 10). Given that the formalization agenda focused primarily on formalizing non-family informal employment, i.e. 3 percent of all working people in the case of Tanzania, the scope for formalization to make a big difference to social protection is small in most African countries.

This is a challenge also for WIEGO (Women in Informal Employment: Globalizing and Organizing). WIEGO has a strong presence in Africa. WIEGO's approach to social protection differs from the ILO's in that, as Lund and Srinivas (2000) noted, 'the informal economy is not a transitional phenomenon, but is here to stay: it will not disappear naturally as part of the development process'. They proceeded to pose the question: 'Under what conditions can what kinds of workers in the informal economy (and especially poorer women) get access to what core measures of provision, which can be incrementally improved upon in the future?'. WIEGO has tried to chart a 'middle path' between formalization (and conventional social insurance) and the universalism of social assistance. In practice, WIEGO seems to have focused primarily on very specific groups of women workers in the informal economy, including domestic workers in countries such as South Africa, home workers in industries such as clothing manufacturing in parts of Asia and urban street vendors in West Africa. WIEGO does not seem to have engaged with the challenge of social protection for peasant women across Africa. When WIEGO officials point to models, they generally point to ones that entail massive state subsidies as well as contributions (such as Rwanda's health insurance system).

Another organization concerned primarily with the rights to social protection of workers is the International Trade Union Confederation's African Region (ITUC-Africa). ITUC-Africa claims to have 16 million declared members in 101 trade unions in 51 countries. One of its objectives is to achieve social protection for all workers. In 2009-10, the ITUC-linked African Labour Researchers Network (ALRN) compiled a study of social protection in Africa, for ITUC-Africa. The ALRN team posed the same basic question as Lund and Srinivas: How to expand social protection given that informal employment was not a transitory phenomenon? (Kalusopa *et al.*, 2013). In practice, ITUC-Africa seems to be proceeding down the same path as WIEGO, searching for models for the extension of state-subsidised, semi-contributory schemes to selected groups of urban, informal workers.

Peasant farmers have been almost entirely absent from discussions of rights to social protection in Africa in part because there have had no major champion among either international organisations or civil society movements. La Vía Campesina was slow to organise in Africa and still have very few member organisations in the region. The AU has not ignored agriculture or food security entirely, but has approached these from the point of view of the needs of consumers more than of the rights of producers. The only initiative within Africa to focus directly on peasants was driven by the FAO and UNICEF through their joint programme on 'From Protection to Production'. The programme sought to link social protection and agricultural production. An impressive 'Framework for Analysis and Action' was drafted in 2016, although this did not invoke or discuss rights. The FAO embraced a rights-based approach in 2017, but its primary institutional partners are Ministries of Agriculture which tend both to apply a productivist approach to agriculture and hunger and to be protective of their (expensive) farm input subsidy programmes.

The expansion of social assistance programmes in Africa has thus been justified primarily in terms of the needs of 'vulnerable groups', i.e. groups of people who are considered to be unable to work as either 'workers' or peasants: The elderly, disabled, children, pregnant women and women whose time is taken up in care work, and in some cases the landless. The rights to social protection of these groups of people have been asserted strongly in the global discourse and (with some qualifications) in the formal positions of the AU (and sub-regional organisations). These groups have also been championed in Africa by international organisations and NGOs, including UNICEF and HelpAge International, as well as African organisations, including especially the African Platform for Social Protection. In their activities in Africa, these organisations have also vernacularized the global rights discourse.

In vernacularizing the global rights discourse, international and local organisations and NGOs have often chosen to downplay rights, asserting rights implicitly rather than explicitly. For example, HelpAge International has long been a strong advocate on the global stage of the rights of the elderly, including (since at least 2004) to social pensions. When engaging with governments in Africa, however, HelpAge downplays rights (as Leutelt noted in 2012: 11). The African Platform for Social Protection (APSP) – established in 2008 as a network of national NGOs – has tended to engage cautiously

with the AU and national governments. The APSP operates from a rights-based basis, but tailors this as necessary:

‘The APSP position is that social protection is provided for in the Universal Declaration of Human Rights (Article 22 and 23) and in ILO conventions, making provision of social protection an entitlement, not charity or a handout. However, the APSP also recognises that governments are on different levels of the social protection debate, development of policy, design and implementation of programmes. Insistence on social protection as a right, therefore, has to take into account the individual country context.’ (20-21)

In practice, the APSP seems to have emphasized rights more strongly than most of the international organisations. Nonetheless, it recognizes also that it wields more influence with national governments when it can back up its arguments in favour of expanded programmes with empirical evidence of their benefits, rather than ideological assertions.

One of the APSP’s objectives is to enshrine commitments to social protection in national constitutions or legislation. ‘Constitutional guarantees play a very important proactive role in introducing social rights into national legislation and in fostering their implementation’, writes the series editor of a new ILO series on *The Right to Social Security in the Constitutions of the World*. Constitutions *can* shape citizens’ understanding of the claims they can make as well as providing institutional mechanisms for pursuing those claims (Egorov, 2016; emphasis added). Barrientos similarly emphasizes the importance of both constitutional and legislative provision for the ‘institutionalisation’ of social protection: ‘Legislative or constitutional recognition is essential to establishing that access to social assistance is an entitlement, and not subject to the discretion of government officials’ (2013: 208).

In practice, and especially in Africa, few social protection programmes have originated in constitutional requirements or even legislation (as Barrientos himself recognizes). Even when social and economic rights are recognized in constitutions or legislation, this has not always had clear and substantive effects on policy-making and implementation. Moreover, the ‘institutionalisation’ of social protection for some people (for example, workers in formal employment) need have no effect on social protection for others. at the level of individual programmes as well as at the level of the country as a whole. Contributory pensions might be institutionalized, but social pensions not at all institutionalized.

South Africa and Kenya stand out in their constitutional endorsement of social and economic rights. South Africa’s 1996 post-apartheid constitution includes a Bill of Rights that recognises explicitly rights to social protection. This case is considered in more detail below. Kenya’s 2010 constitution recognizes rights to (inter alia) ‘social security’ as well as freedom from hunger: ‘The State shall provide appropriate social security to persons who are unable to support themselves and their dependents’. The Constitution goes on to set out the rights of children and the disabled, without mentioning any rights to social assistance. The State is required, however, to ‘take measures to ensure’ that ‘older persons ... receive reasonable care and assistance from their family and the State.’ These rights are clearly circumscribed.

Most other African countries recognize social and economic rights in their constitutions weakly, at best through directive principles of state policy, or not at all. As Chirwa concludes with respect to the constitution of Malawi, the protection of socio-economic rights is 'inadequate' and 'half-hearted' (2005a: 214, 241).

The constitutions of some African states are distinctively African in other respects. The family features in many constitutions. For example, Malawi's 1994 constitution recognizes the family as 'the natural and fundamental group unit of society' and committed the state to protecting the family. The Kenyan Constitution insists that 'The family is the natural and fundamental unit of society and the necessary basis of social order, and shall enjoy the recognition and protection of the State' (Article 45 (1)). Article 25 of Zimbabwe's Constitution similarly requires that the State protects and fosters the institution of the family. In Cabo Verde, also, the family is identified in the constitution as 'the fundamental element and the foundation of the whole society' (Article 84 (1)).

Self-reliance and work also feature in several constitutions. The Tanzanian constitution also requires that the state 'shall make provisions to ensure that every person earns his livelihood', i.e. that he or she works. The constitution of Cabo Verde specifically discusses citizens' duties. 'Everyone shall have duties towards his family, the society and the State and also towards other legally recognized institutions' (Article 80), including duties to 'work within the limits of his capabilities and capacities' and to 'pay the contributions and taxes established by law' (Article 82 (b) and (c)).

In sum, there is wide variation between African countries in the constitutional recognition of rights to social protection. Very few African countries enshrine clear rights to either income or food security, but some point to ill-defined rights to social security, especially for specific groups such as the elderly. Constitutional provisions are almost always vaguer and weaker than the provisions in the international agreements signed by most African states. Like the Africanised versions of international charters and protocols, national constitutions in Africa often include an emphasis on the family, and sometimes also on duties.

Overall, the 'vernacularisation' or 'localisation' within Africa of global discourses of rights to social protection has entailed a complex mosaic of strong calls, weak calls and silences, applied unevenly to different sections of the population. Supposed undertakings are strongest for workers, the elderly and children. They are weakest, if not almost entirely absent, for peasant farmers. In rights discourses within Africa, much stronger explicit attention has been paid to rights to 'social' security – implying some kind of right to *income* security – than to rights to *food* security (or food sovereignty). In this, the African experience contrasts with experiences in Latin America (where the struggle for peasants' rights – and perhaps rights generally – is relatively stronger) or South Asia (where the struggle for the right to food is relatively stronger). Rights to social security have generally been associated with specific groups (workers, and perhaps the elderly), with little or no consideration of the rights of peasant farmers.

The discourse of rights in Africa may be both muted and partially vernacularized, but it retains many features derived from its origins in the global discourse. Englund, in *Prisoners of Freedom* (Englund, 2006), argues that all sorts of actors – including well-meaning NGOs – can be prisoners of their concept of rights, with the risk that their promotion of some rights serves to hide other injustices or inequities. He contrasts the ‘western’ individualistic understanding of poverty – and, we might add, economic and social rights – with local understandings in Malawi. In Chichewa, poverty (*umphawi*), which refers to the absence of food, medicine, clothing and so on, is contrasted with destitution (*kusaukitsitsa*), which refers to the absence of relationships as well as possessions. ‘Much of the moral debate about poverty carried out in Chichewa explores the thin line that separates the two conditions.’ Villagers in Malawi make claims not as individuals or even as communitarian groups, but as ‘persons in relationships’. Society comprises neither solidaristic communities nor autonomous individuals, but a world of people linked through complex relationships (Englund, 2012). In Africa, the global discourse of rights to social protection does acknowledge responsibilities but goes no further in incorporating the kind of understanding that Englund discusses with respect to Chichewa.

4: Neither necessary nor sufficient: Case studies of Rights and social protection at the national level

This section examines the extent to which, and ways in which, the new ‘global’ discourse of rights has been incorporated into national law, strategy, policy and practice. The section examines the Anglophone cases of South Africa, Botswana and Zambia (in Southern Africa) and the Francophone case of Senegal (in West Africa). The first three cases were selected purposively because they exemplify different patterns of the institutionalisation of both rights and social protection programmes (see Figure 4.1). South Africa is the case where social and economic rights are most fully institutionalized, not only in the Constitution and legislation, but also in court cases, political rhetoric and even popular discourse. South Africa also has a social assistance system that is both unusually extensive and unusually generous. Botswana also has an extensive system of social assistance, but it is parsimonious rather than generous, and the government and ruling party have long eschewed any mention of social or economic rights. Whereas South Africa has adopted a classically ‘rights-based’ approach, Botswana’s welfare state is based on very different norms and values. Zambia provides an example of a country where both programmes and discourses of social protection are fluid, and the focus of contestation. Ideally, we would have considered also a case of a country with a strong formal commitment to social and economic rights but little public provision in practice. Kenya might have fallen into this position in the early 2010s, when its programmes did not match the promises in its new constitution. Africa as a whole might be considered to occupy this space, through the AU’s formal commitments.

		Formal institutionalisation of rights	
		Weak	Strong
Social protection	Limited	Zambia	<i>Kenya?</i>
	Extensive	Botswana	South Africa

Figure 4.1: Case-studies in terms of institutionalization of rights and extent of social protection

In reality, the variation between countries might better be understood in terms of 2-dimensional space rather than a 4-quadrant diagram. We currently do not have good cross-national data on either the institutionalisation of rights or effective coverage or reach (taking into account the scope, extent and level of social protection. This is a topic for further research. Our intuition is that the relationship between the institutionalization of rights and effective coverage is weak.

4.1. South Africa

South Africa is often held up as an international lodestar, in terms of both its constitutional provision for social and economic rights and the actual reach (and effects on poverty) of its social assistance programmes. South Africa clearly has both an unusually high degree of institutionalization of rights and unusually extensive social protection coverage.

South Africa's post-apartheid constitution, adopted in 1996, includes a bold vision of socio-economic rights. Section 27 specifies that 'everyone has the right to have access to ... (c) social security, including, if they are unable to support themselves and their dependents, appropriate social assistance'. This is qualified using the 'progressive realisation' formula included in the 1966 International Covenant on Economic, Social and Cultural Rights: 'The state must take reasonable legislative and other measures, within its available resources, to achieve the progressive realization of each of these rights'. Most major welfare programmes are also governed by legislation.

The extensive reach or coverage of South Africa's social insurance and social assistance programmes – and the remaining gaps – have been widely analysed. In summary, social assistance benefits are paid out monthly to more than 3 million old-age pensioners, 1 million disabled adults and the caregivers (usually mothers) of about 12 million children, i.e. to or for about one in three people in the population as a whole. Close to 9 million children also eat free meals at school. South Africa's contributory ('semi-social') insurance system covers about 10 million people for medical aid and their future retirement. There remains a large coverage gap: The Unemployment Insurance Fund and workfare programmes provide support for only a small minority of the unemployed.

South Africa's extensive welfare state largely *predated* the recognition of social and economic rights in the 1996 constitution. The post-apartheid state inherited social

assistance and occasional public works programmes that redistributed from taxpayers to the poor and a 'semi-social' insurance system that provided for limited risk-pooling and savings for many workers in formal employment. Following the constitutional recognition of social and economic rights, the welfare state was expanded (especially through the Child Support Grant, which replaced an earlier and racially-exclusive programme) but the gap in coverage of the unemployed persists. The government rejected calls for a Basic Income Grant to cover all adults and has allocated only a modest budget to workfare programmes. The recognition of rights in the Constitution has not (yet) resulted in any major expansion of the welfare system to fill coverage gaps. The ruling party (the African National Congress, ANC) and government have been preoccupied with development rather than 'welfare', have generally been anxious about 'dependency' on 'handouts', and have increasingly emphasized 'family values'. Two planned reforms (of the contributory pension system and health care financing) have proceeded slowly, and without justification on constitutional grounds. In short, the South African case suggests that constitutional rights to social protection might not be sufficient for major reform.

4.2. Botswana

Botswana also built an extensive welfare state by the 2000s, but this welfare state had multiple conservative features and the government and ruling party were strongly opposed to the rights associated with the global rights discourse. Viewed in terms of public expenditure on social protection, Botswana lags behind many other middle-income countries in Africa (and elsewhere). Viewed in terms of the overall coverage of institutionalized programmes, however, provision far exceeds that of most other African countries. Coverage is extensive but expenditure modest primarily because most benefits are set at parsimonious levels. For example, the value of the old age pension in Botswana is only one-fifth of the value of the pension in neighbouring South Africa, despite their similar GDP per capita.

The Botswana Democratic Party, which has governed Botswana since independence, has a longstanding commitment to poverty-reduction but an aversion to any discussion of rights. Citizens of Botswana have no formal, legal rights to social protection. The Constitution of Botswana, dating from 1965, does not refer to any social or economic rights. Most of the country's programmes of social protection have no legislative basis. Botswana has *not* ratified any of the relevant ILO Conventions nor acceded to nor signed the International Covenant on Economic, Social, and Cultural Rights. Botswana has no social protection policy or strategy. Policy documents that discuss poverty reduction (or, more recently, poverty eradication) – notably the National Development Plans – emphasise the expansion of opportunities for the poor 'to help themselves' through 'sustainable livelihoods' and downplay social protection. 'Empowerment' programmes that help unemployed youth to establish small businesses are preferred over cash transfers. Workfare is preferred over grants. The spectre of 'dependency' is ever-present.

Whilst the BDP and government have avoided referring to explicit rights, they have emphasized the responsibility of society for the deserving poor, which implies that the deserving poor have some informal or weak rights. This concept of responsibility

underpinned the expansion of drought relief in the 1960s, 1970s and 1980s, and the institutionalization of a welfare state, especially in the 1990s. This conservative welfare doctrine was expressed in terms of the Tswana concept of *kagisano*, which was usually translated as ‘unity, peace, harmony and a sense of community’ (Gulbrandsen, 2012). This doctrine emphasized both the responsibility of the poor themselves to work hard and take advantage of whatever opportunities were open to them and the responsibility of the state – on behalf of society – to assist the poor. Society – through the state – had a responsibility to the able-bodied poor to ensure opportunities for work so that poor people could support themselves and their dependents. Society also had a responsibility to support any elderly or disabled people, or children, whose families were unable or unwilling to support them. This doctrine implied informal rights, but not explicit or formal ones. The result, as articulated in *Vision 2016* (adopted in 1996), was that the future Botswana was imagined as ‘a compassionate and caring society, offering support and opportunity to those who are poor, and including *all* people in the benefits of growth’ (Botswana, 1997: 8, emphasis in original). Botswana would provide a safety net for the unfortunate whilst guarding against ‘a culture of dependency’ (*ibid*: 25).

This implicit recognition of rights both sustained and limited the expansion of social protection. Old-age pensions, grants for orphans and workfare were introduced or expanded, but other proposed reforms (including a proposed child grant) were rejected. The Botswana Federation of Trade Unions (BFTU) and opposition parties have called for the formalization or institutionalization of the country’s programmes and increases in benefits but tend to share with the BDP and government an anxiety about ‘dependency’.

At no point was the expansion of social protection driven or even shaped by legal rights. Botswana was a clear case of reform without any conducive rights framework. This suggests that an explicit rights framework is not necessary for the expansion of social protection.

4.3. Zambia

There is a clear need for social protection reforms in Zambia: Poverty is widespread; social and economic change compounded by AIDS have resulted in growing numbers of ‘vulnerable’ individuals who are not being supported by kin; and the reach or coverage of existing programmes remains very uneven. The political elite, however, is for the most part not very sympathetic to the poor.

Neither the Zambian constitution nor legislation recognizes any rights to social protection. The constitution directs the state to improving livelihoods but does not formally recognize any social or economic rights. The inclusion of some social and economic rights, including a right to social protection, was considered in deliberations over constitutional reforms in 2016. Proposals to broaden the Bill of Rights were rejected in a referendum. A new, integrated Social Protection Bill was supposed to have been finalised in mid-2017, but seems to have been delayed. It was reported that the Bill would, for the first time, provide for social assistance. Hitherto, social assistance had been expanded through executive not legislative action.

Social and economic rights are alluded to in other government documents. *Vision 2030* envisaged that Zambia would become ‘a nation that promotes and provides sustainable security against deprivation and extreme vulnerability by 2030’. Specific targets include ‘ensuring that incapacitated and low capacity households have sufficient livelihood security to meet basic needs, and are protected from the worst impacts of risks and shocks’, reducing the number of vulnerable and incapacitated households (Zambia, 2006a). The Sixth, Revised Sixth and Seventh NDPs committed the Government to social protection. In 2014, a National Social Protection Policy was adopted. Supposed commitments in these documents have not been translated into practice.

Zambian governments have expanded social protection programmes very slowly and coverage gaps remain wide. Contributory programmes provide for some people in formal employment. Social assistance programmes have expanded, although their reach only partially closes the coverage gap among rural and informal urban populations. The Social Cash Transfer programme expanded rapidly in and since 2014, reaching more than 500,000 households – i.e. about one in six households in Zambia – in 2017. A minority of children are fed through school feeding schemes. Many more households benefitted from the Farmer Input Support Programme (FISP), which provided subsidized fertilizer and other inputs for farmers.

The slow expansion of social protection in Zambia is not due simply to the lack of any formal recognition of social and economic rights. The expansion of social protection in Zambia has actually been stalled, repeatedly, because of the ambivalence or even opposition of political elites. Until 2011, senior government ministers in Zambia blamed poverty on poor people themselves. In this view, cash transfer programmes may worsen poverty by discouraging the poor from hard work. A group of leaders within the Patriotic Front, elected in 2011, was more sympathetic to social protection, but the group was marginalized politically after 2014. Contributory social security programmes might be expanded among groups such as domestic workers, saw mill workers and construction workers as well as among organized groups such as market traders, bus and taxi drivers. Despite the efforts of the ILO and other agencies, progress has been slow. International organisations and donor agencies pushed for the expansion of social protection, and secured the adoption of a promising Social Protection Policy and the expansion of Social Cash Transfer programme. Overall, however, Government ministries seem to be unable to coordinate.

4.4. Senegal

In some respects, Senegal is not unlike Zambia. Peasant farmers comprise a large majority of the population, with formally or informally-employed non-agricultural workers comprising a very much smaller minority. But the two countries have very different policy regimes, because discourses of rights and practices of social protection differ between Anglophone and Francophone countries.

Within Francophone Africa, Senegal stands out in that ‘basic civil and political rights’ are relatively entrenched. Economic, social and cultural rights might remain ‘minimal and often indirect’ but are not entirely ‘illusory’ (Diallo, 2016: 396). Francophone African countries tend to have more active peasants’ organisations, and Senegal has enacted legislation on food sovereignty. Senegal’s social protection policies share many of the characteristics of systems in other Francophone countries whilst being on the more extensive end of that range.

Social protection in Senegal has its roots in the years following the Second World War, when France’s colonial subjects enjoyed some of the rights of French citizens. The preamble to France’s 1946 constitution emphasised the right of ‘the children, the mother, and the elderly workers to health protection, material security, rest and leisure’. In addition, ‘each person whom, because of his age, his physical or mental condition or his economic situation, is unable to work has the right to receive adequate social assistance from the state’ (quoted in *ibid.*: 402). Prior to independence, there was ongoing debate over the application of French policies in its colonies. The 1952 Code du Travail extended eligibility for family allowances to all formally-employed workers in the colonies but not to the ‘customary’ labour employed by African farmers (Cooper, 2012: 182). Rights for formally-employed workers were institutionalised through social security funds that were generally controlled by employers and workers, with autonomy from the state. In the early 2000s the social security systems in Senegal for formally-employed workers covered somewhere between 10 and 20 percent of the population (Hodges, 2008; World Bank, 2013). Few poor and informal sector workers have access to the social insurance system (see further Daffe and Diene, 2017).

Social protection remained limited to formally-employed workers and their dependents for the rest of the twentieth century. There was no provision for the rural or urban poor. Following Independence, the Senegalese elite appeared to be committed to rights in general – as was evident in the roles played by the Senegalese president (Senghor) and judge president (Mbaye) in the 1981 African Charter – but not to social and economic rights. Social and economic rights were extended in a new constitution in 2001 (following an opposition victories in the 2000 elections) and in proposed revisions in 2013 (following another political turnover). But it seems that social and economic rights remain non-justiciable. Senegalese governments nominally committed themselves to the expansion of social protection, including through a National Social Protection Strategy (Stratégie Nationale de Protection Sociale, SNPS, in 2005) and the country’s second and third Poverty Reduction Strategy Papers (in 2006 and 2011).

Despite pressure from several international organisations, the government was slow to expand social protection beyond the formal sector. The ILO, Unicef and other agencies produced reports that showed that pro-poor social protection was affordable (see Seekings, 2017a). As of 2011, the government did provide food aid to about 3.6 million people through the Food Security Commissariat (Commissariat à la Sécurité Alimentaire, CSA) and about 780,000 children through two school lunch programmes. The only cash transfer programmes for the poor were several pilot schemes. The total cost of these

programmes (excluding a workfare programme run by the WFP) came to less than 0.3 percent of GDP, two-thirds of which was funded by donors (World Bank, 2013).

The government elected in 2012 emphasized social protection more strongly than its predecessors. It included explicit commitments to expand both contributory and non-contributory social protection in its *Plan Sénégal Émergent* (Senegal, 2012: 80-82) and established new state institutions. In 2013, the government began to roll out a conditional cash transfer scheme, the Programme National de Bourses de Sécurité Familiale (PNBSF), with the financial backing of the World Bank. By 2017 this was reaching about 300,000 households, i.e. about one-fifth of the population. The benefit was modest, set initially at the equivalent of US\$15/month. The programme has not been presented in terms of rights.

Modest provision for the poor has expanded, as in Zambia, but huge coverage gaps remain. There is no provision for most elderly people or children. Small farmers in rural areas are largely neglected.

4.5. Lessons from the country case-studies

Both the need for and provision of social protection varies considerably between these four cases. South Africa is, in economic terms, a post-agrarian society: Whilst many poor households live in rural areas, very few are engaged in – or might engage in – peasant agriculture. The South African poor depend overwhelmingly on the government's social assistance programmes and (to a much lesser and declining extent) remittances sent by kin in urban areas. Botswana is becoming a post-agrarian economy, in which the likelihood of achieving livelihoods through peasant agriculture has declined and continues to decline. Zambia and Senegal, in contrast, remain highly agrarian, with large proportions of the population engaged in peasant agriculture. Senegalese peasants are much more engaged in the market economy than their Zambian counterparts, but poverty is widespread in the rural areas of both countries. Conversely, South Africa has a much larger formal sector. These differences frame the risks against which people need to be protected and help us to understand the salience of formal and informal rights discourses.

In neither South Africa (prior to 1996) nor Botswana was the expansion of social protection accompanied by any explicit commitment to social and economic rights. South Africa's social protection system largely predated the recognition of rights in the 1996 constitution, and those rights played little part in the minor reforms to the system thereafter. In Botswana, also, the expansion of social protection was not associated with any explicit discourse of rights, although rights were implicitly recognized through a doctrine that emphasized the responsibilities of the state, on behalf of society. These two cases show that an explicit discourse of social and economic rights may be neither sufficient nor necessary for the expansion of social protection.

Zambia and Senegal are cases of countries that are far more typical of Africa in that there is at most only a weak recognition of social and economic rights in the constitution, legislation or political discourse, and social protection has not expanded beyond two

minority sections of the population: Workers in formal employment, many of whom (especially in Senegal) are covered by contributory programmes; and some 'vulnerable' individuals especially in 'incapacitated' households, who receive very modest benefits through new social assistance schemes strongly supported by international organisations and donor agencies.

The facts that an explicit recognition of rights has historically been neither necessary nor sufficient for the expansion of social protection need not preclude the possibility that, in future, a rights-based approach would serve to mobilise support for and weaken opposition to social protection reforms, especially in countries (such as Zambia and Senegal) where the reach or coverage of social protection remains limited and little attention is paid to rights. The final section turns to the question of the likely politics of rights and reform in future.

5: Explicit and implicit rights and the expansion of social protection

There remain huge gaps in the reach or coverage of social protection across most of Africa. ILO data suggests that only a minority – perhaps one-third – of elderly people receive a pension, and the reach or coverage of cash transfer programmes for other poor people is even lower. Feeding schemes do reach a larger number of school children, but even they reach only a small minority of children across Africa as a whole. Coverage is uneven among workers in formal employment, growing but still limited among vulnerable groups and incapacitated households, and almost non-existent among workers in informal and rural economies. Across most of Africa, people have neither formal rights to social protection nor any claim in practice on social protection programmes.

Social protection has limited coverage or reach because the expansion of social protection has rarely attracted strong support among the political elite across much of Africa. In many countries, the political elite is either ambivalent or hostile to the idea that social protection might be expanded. The predominant strategy among advocates of social protection has been to point to its benefits in terms of immediate poverty-reduction and longer-term development. The World Bank is a powerful proponent of the developmental argument, in support of its proposals for targeted programmes, but many critics of the World Bank subscribe to the basic developmental argument. Despite these arguments, widespread opposition to the expansion of social protection persists across much of Africa.

It is tempting, therefore, to consider a rights-based approach as an alternative strategy for promoting social protection. Social and economic rights – including specific rights to social protection – have a long history in 'global' fora and have been incorporated (with modification) into the OAU and AU's formal positions. Some national constitutions also recognize rights to social protection. Overall, however, most African governments have been reluctant to recognize rights to social protection. Most social insurance programmes are governed by legislation but most social assistance programmes were introduced

through executive fiat. Perhaps a more energetic emphasis on rights to social protection would nudge or push governments into reform.

The global rights discourse focuses on rights for workers (in formal employment, in the 'modern' economic sectors), their dependents and the 'deserving' categories of the elderly, disabled and children, i.e. the groups that comprised the populations of the industrialised societies of north-west Europe. Applied to Africa, through for example national social protection floors, this would entail the 'top-down' consolidation of social insurance programmes for the formally employed and their expansion to at least some informal sector workers together with the 'bottom-up' expansion of social assistance programmes. Such a strategy has two weaknesses. First, it ignores the fact that peasant farmers constitute a majority of the population across most of Africa. This group has been largely disregarded in the push for social protection floors. Secondly, political and economic elites across most of Africa are hostile to the recognition of the rights of the poor, largely because they consider the poor to be responsible for their own poverty. An explicitly rights-based approach to rights might therefore assist with strengthening social insurance systems but it may not be as effective a strategy with respect to social assistance and might neglect entirely the peasant farming sector.

This does not mean, however, that there is no potential for a strategy framed in a normative discourse. The predominant understanding of welfare among political elites, at least in East and Southern Africa, has an alternative normative basis, emphasising responsibilities rather than rights, and relationships rather than individual entitlements. This explains why there is deep opposition to the provision of public assistance to working-age adults, except through workfare or in times of emergency, and why there is widespread anxiety over 'dependency' on 'handouts'. Elite beliefs do, however, open up the possibility of expanding social protection for specific categories of people – especially the elderly and children – when kin have otherwise failed in their responsibility to provide support. Concepts of responsibility and opportunity point to the possibility of an effective, implicitly rights-based approach to expanding social protection.

In interviews and discussions with politicians across a range of East and Southern African countries we find little interest in, or even acknowledgement of, the global discourse of rights to social protection. Except when they are reading from speeches drafted by technocrats who have bought into the global discourse, ministers and members of parliament rarely (if ever) refer to rights, international covenants or social protection floors. Our research generally echoes the research conducted among elites in Malawi in 2008 by Kalebe-Nyamongo (2014). Kalebe-Nyamongo found that Malawian elites blamed poverty on the passivity of the poor. 'They know that if they do not work, someone will come to help them', said one interviewee. Cash transfer programmes were said to encourage laziness. Our own research confirms the prevalence of this aversion to 'dependency' on 'handouts', with the presumption that cash transfers have negative effects on both productivity and morality. This view of dependency is widespread across Africa.

At the same time, some elites articulate a discourse of *responsibility*. In this view, the state shares a responsibility for poor people with the poor themselves, in a reciprocal way. This discourse of responsibility was especially evident in the case of Botswana, primarily due to the imperatives of drought relief. Responsibility was shared between the individual and society, with the state acting on behalf of society, as chiefs had previously. Society was viewed as a form of extended family, with an essential unity. Individual self-fulfillment as well as identity depended on social and communal relationships. Individuals had a moral obligation to work, and to be as self-reliant as possible. People should neither give nor get 'something for nothing'. This was not an egalitarian ideology. On the contrary, inequality and patriarchy were generally viewed as natural. The expansion of public provision was not accompanied by any discussion of rights.

This form of responsibility (and reciprocity) is a weak or thin version of solidarity. It is also offset by anxiety over 'dependency'. In Africa, dependency marks the breakdown of reciprocity as poor people behave as selfish individuals rather than fulfill their own responsibilities to others. In Botswana and elsewhere, responsibility pushed elites tentatively towards pro-poor reforms whilst anxiety about 'dependency' reeled in any nascent enthusiasm. The result in Botswana was that provision for the poor became extensive but many benefits are in kind not cash and most cash benefits remain very modest.

Norms of social responsibility have little bearing on workers' rights. Workers are generally viewed as having rights in relation to their employers. It is the employers who, at least in the first instance, have obligations to their employees. The focus of social insurance schemes on formally-employed workers is not simply a matter of Eurocentric influence or operational convenience. It is also an ideological or discursive issue. If a worker does not clearly have an employer who is exploiting him or her, then it is unclear who has an obligation to recognise the worker's rights. In Africa, a large proportion of informal sector workers are self-employed, whether as marginal hawkers or relatively well-off artisans. Even with manufacturing it seems that there are growing numbers of people who are formally self-employed, doing piecework, often at home.

It is not clear how meaningful rights can be realized for self-employed or other informal workers. The AU's SPIREWORK programme envisaged the expansion of social protection to people working in the informal economy, but the envisaged schemes tend to be self-financing, and may involve more saving than risk-pooling. The experience of Zambia suggests that there is some potential for expanding social insurance to some groups of informal wage workers, but the scale is small in comparison with the numbers of people living in poverty, especially in rural areas. WIEGO imagines that rights can be realized in relation to consumers, by passing the costs of social protection onto them (especially when value chains are global, linking rich consumers in the global North and poor workers in the global South) (Lund, 2009). The practical challenges remain enormous. In practice, in the absence of a formal employer, there is no real substitute for the state and public financing, as even the ILO seems to recognize: 'Schemes for self-employed workers are more successful when the government is willing to subsidize part of the premium' (ILO, 2009: 42). If schemes for workers were to be financed out of special

taxes, the obvious question is why should scarce tax revenues be allocated to them rather than the very poor?

Given the difficulties in expanding the rights of workers, even the ILO recognizes the need for a tax-financed social protection *floor*. As the ILO, World Bank and others have argued, a basic floor – especially one that is targeted on the poor – is affordable. The constraint on the expansion of social assistance is largely political, and in significant part ideological. In the face of deep and wide opposition to the recognition of the rights of most poor people, a strategy that focuses on the responsibilities of society might prove most effective in building support for (and defusing opposition to) the expansion and institutionalization of social protection.

Furthermore, reformers might consider more seriously also the conservative conception of rights to equal or at least fair *opportunities*. In the contemporary African context, this might entail more sustained thinking about (a) the rights of small farmers in terms of opportunities to produce and perhaps sell their produce, which is bound up with the right to food or to ‘food sovereignty’, and (b) the rights of them and others to employment. The first of these requires engagement with a different set of organisations, including the FAO. The AU, ILO and FAO may have begun to consider how to integrate social protection with agricultural policies, but they do not seem to have made much progress. Some attention has been given to the second of these approaches. Conservative elites have accepted ‘workfare’ because it imposes the condition of work, which is in part a condition of reciprocity, on recipients. Workfare has been rolled out on a large scale on occasion in Africa, primarily as a mechanism for drought relief. India’s Mahatma Gandhi National Rural Employment Guarantee Scheme offers an important model here. Much more attention might be paid to the possibility of Employment Guarantee Schemes in Africa.

The application of rights-based approaches to social protection in Africa thus entails both a challenge and an opportunity. The challenge is to vernacularise effectively the global rights discourse, taking into account the conservatism of African elites and the fact that poverty is most pronounced among peasant farmers. The opportunity is to build on the implicit recognition of rights entailed in the ideology of family, responsibility and opportunity.

References

- Baricako, Germain (2008), 'Introductory Preface: The African Charter and African Commission on Human and Peoples' Rights', in Malcolm Evans and Rachel Murray (eds), *The African Charter on Human and Peoples' Rights, 2nd edition, The System in Practice, 1986-2006* (Cambridge: Cambridge University Press): 1-19.
- Barrientos, Armando (2013), *Social Assistance in Developing Countries* (Cambridge: Cambridge University Press).
- Beegle, Kathleen, Luc Christiaensen, Andrew Dabalen and Isis Gaddis (2016), *Poverty in a Rising Africa: Overview* (Washington DC: World Bank).
- Botswana (1997), *Vision 2016* (Gaborone).
- Cichon, Michael (2013), 'The Social Protection Floors Recommendation, 2012 (No. 202): Can a six-page document change the course of social history?', *International Social Security Review* 66,3-4: 21-43.
- Chirwa, Danwood (2005a), 'A full loaf is better than half: The constitutional protection of economic, social and cultural rights in Malawi', *Journal of African Law* 49,2: 207-241.
- (2005b), 'The African Human Rights Framework', in Malcolm Langford (ed.), *Social Rights Jurisprudence : Emerging Trends in International and Comparative Law* (Cambridge: Cambridge University Press): 323-38.
- Claeys, Priscilla (2015), *Human Rights and the Food Sovereignty Movement: Reclaiming Control* (Routledge/Earthscan).
- Cooper, Frederick (1996), *Decolonisation and African Society* (Cambridge: Cambridge University Press).
- Cornia, Giovanni, Richard Jolly, and Frances Stewart (1987), *Adjustment with a Human Face: Protecting the Vulnerable and Promoting Growth* (Oxford: Oxford University Press).
- Daffé, Gaye, and Mbaye Diène (2017), 'Vulnerability and Social Protection: Evidence from Senegal', *NoPoor Working Paper 3* (Consortium pour la Recherche Economique et Sociale, CRES).
- Davis, Benjamin, Sudhanshu Handa, Nicola Hypher, Natalia Winder Rossi, Paul Winters and Jennifer Yablonski (eds, 2016), *From Evidence to Action: The Story of Cash Transfers and Impact Evaluation in Sub-Saharan Africa* (Oxford: Oxford University Press, FAO and Unicef).
- Deacon, Bob (2013), *Global Social Policy in the Making: The foundations of the social protection floor* (Bristol: Policy Press).
- Diallo, Fatima (2016), 'Direct constitutional protection of economic, social and cultural rights in Francophone legal systems: Senegal', in Danwood Chirwa and Lilian Chenwi (eds), *The protection of Economic, Social and Cultural Rights in Africa* (Cambridge: Cambridge University Press): 396-422.
- Durnford, Robin (2016), *The Politics of Transnational Peasant Struggle: Resistance, Rights and Democracy* (London and New York: Rowman and Littlefield).
- Egorov, Alexandre (2016), 'Foreword: Making social security a constitutional right', in ILO, *The Right to Social Security in the Constitutions of the World: Broadening the moral and legal space for social justice, Volume 1: Europe* (Geneva: ILO): xv-xvii.

- Englund, Harri (2006), *Prisoners of Freedom: Human Rights and the African Poor* (Berkeley: University of California Press).
- (2012), 'Poverty', in Didier Fassin (ed.), *A Companion to Moral Anthropology* (Oxford: Blackwell).
- Esping-Andersen, Gøsta (1985), *Politics Against Markets: The Social Democratic Road to Power* (Princeton: Princeton University Press).
- FAO (2017), *FAO Social Protection Framework: Promoting Rural Development for All* (Rome: Food and Agriculture Organisation).
- Forteza, Alvaro, Leonardo Lucchetti and Mntserrat Pallares-Miralles (2009), 'Measuring the Coverage Gap', in Robert Holzmann, David Robalino and Noriyuki Takayama (eds), *Closing the Coverage Gap: Role of Social Pensions and Other Retirement Income Transfers* (Washington DC: World Bank).
- Garcia, Marito, and Charity M.T. Moore (2012), *The Cash Dividend: The Rise of Cash Transfer Programs in Sub-Saharan Africa* (Washington D.C.: World Bank).
- Gulbrandsen, Ørnulf (2012), *The State and the Social: State Formation in Botswana and its Precolonial and Colonial Genealogies* (New York: Berghahn).
- Hickey, Sam, and Jeremy Seekings (2017), 'The global politics of social protection', *UNU-WIDER Working Paper 2017/115* (Helsinki: UNU-WIDER).
- Howard, R. (1983), 'The full-belly thesis: Should socio-economic rights take priority over civil and political rights? Evidence from Sub-Saharan Africa', *Human Rights Quarterly* 5: 467-90.
- ILO (2009), 'The Informal Economy in Africa: Promoting transition to formality: Challenges and strategies' (Geneva: ILO, 2009).
- (2014), *World Social Protection Report 2014/15: Building Economic Recovery, Inclusive Development and Social Justice* (Geneva: International Labour Office).
- (2015), 'Recommendation Concerning the Transition from the Informal to the Formal Economy', adopted at the 104th session of the International Labour Conference, Geneva.
- (2017), *World Social Protection Report 2017-19: Universal Social Protection to Achieve the Sustainable Development Goals* (Geneva: International Labour Office).
- Ishay, Micheline (2004), *The History of Human Rights: From Ancient Times to the Globalization Era* (Berkeley: University of California Press).
- Kabandula, Abigail, and Jeremy Seekings (2016), 'Donor influence, the Minister of Finance and welfare policy reform in Zambia, 2003-11', *CSSR Working Paper 395* (Cape Town: Centre for Social Science Research, University of Cape Town).
- Kalebe-Nyamongo, Chipiliro, and Heather Marquette (2014), 'Elite Attitudes Towards Cash Transfers and the Poor in Malawi', *DLP Research Paper 30* (Birmingham: Developmental Leadership Programme, University of Birmingham).
- Levitt, Peggy, and Sally Merry (2009), 'Vernacularization on the ground: local uses of global women's rights in Peru, China, India and the United States', *Global Networks* 9,4: 441-461.
- Lindholt, Lone (2001), *Questioning the Universality of Human Rights: The African Charter on Human and Peoples' Rights in Botswana, Malawi and Mozambique* (Aldershot: Ashgate).

- Luebbert, Gregory (1984), *Liberalism, Fascism, or Social Democracy: Social classes and the political origins of regimes in interwar Europe* (Oxford: Oxford University Press).
- Lund, Francie (2009), 'Social protection, citizenship and the employment relationship', *WIEGO Working Paper (Social Protection) no.10* (Cambridge, MA: WIEGO).
- and S. Srinivas (2000), 'Learning from Experience: a gendered approach to social protection for workers in the informal economy' (Geneva: ILO).
- Merry, Sally Engle (1997), 'Changing rights, changing culture', in Jane Cowan, Marie-Benedicte Dembour and Richard Wilson (eds), *Culture and Rights: Anthropological Perspectives* (Cambridge: Cambridge University Press): 31-55.
- Mutua, Makau (2002), 'The Banjul Charter: The Case for an African Cultural Footprint', in A.A.An-Na'im (ed), *Cultural Transformation and Human Rights in Africa* (London: Zed): 68-107.
- SADC (2003), *Charter of Fundamental Social Rights in SADC* (Gaborone: Southern African Development Community).
- Seekings, Jeremy (2016) 'Drought relief and the origins of a conservative welfare state in Botswana, 1965-1980. *CSSR Working Paper 378* (Cape Town: Centre for Social Science Research, University of Cape Town).
- (2017), "'Affordability" and the political economy of social protection in contemporary Africa', *UNU-WIDER Working Paper 2017/43* (Helsinki: UNU-WIDER).
- Sepúlveda, Magdalena, and Carly Nyst (2012), *The Human Rights Approach to Social Protection* (Helsinki: Ministry for Foreign Affairs).
- Shivji, Issa (1989), *The Concept of Human Rights in Africa* (Dakar: CODESRIA).
- Sloth-Nielsen, Julia (2016), 'The Protection of Children's Economic, Social and Cultural Rights under the African Children's Charter', in Danwood Chirwa and Lilian Chenwi (eds), *The protection of Economic, Social and Cultural Rights in Africa* (Cambridge: Cambridge University Press): 155-79.
- Ulriksen, Marianne (2016), 'Ideational and Institutional Drivers of Social Protection in Tanzania', *UNU-WIDER Working Paper 2016/142* (Helsinki: UNU-WIDER).
- UN Human Rights Council (2012), 'Final study of the Human Rights Council Advisory Committee on the advancement of the rights of peasants and other people working in rural areas' (United Nations Human Rights Council)
- van Ginneken, W. (ed.) (1999), *Social Security for the Excluded Majority: Case-studies of Developing Countries* (Geneva: International Labour Office).
- Von Gliszczynski, Moritz (2015), *Cash Transfers and Basic Social Protection* (London: Palgrave).
- and Lutz Leisering (2016), 'Constructing new global models of social security: How international organizations defined the field of social cash transfers in the 2000s', *Journal of Social Policy* 45,2: 325-343.
- World Bank (2015a), *The State of Social Safety Nets 2015* (Washington DC: World Bank).
- (2017), *The State of Social Safety Nets 2017* (Washington DC: World Bank).
- Yeates, Nicola (2017), 'Beyond the Nation State: How can regional social policy contribute to achieving the sustainable development goals?' *UNRISD Issue Brief 5* (Geneva: United Nations Research Institute for Social Development).
- Zambia (2006a), *Vision 2030* (Lusaka).
- Ziegler, Jean, Christophe Golay, Claire Mahon and Sally-Anne Way (2011), *The Fight for the Right to Food: Lessons learned* (Basingstoke: Palgrave Macmillan).