



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/02/2020 | Report No: ESRSA00871



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Turkey	EUROPE AND CENTRAL ASIA	P173997	
Project Name	Safe Schooling and Distance Education		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	5/27/2020	6/25/2020
Borrower(s)	Implementing Agency(ies)		
Government of Turkey	Ministry of National Education of Turkey		

Proposed Development Objective(s)

To enhance the capacity of the education system to provide e-learning equitably to school-age children during and following the COVID-19 pandemic and future shocks

Financing (in USD Million)	Amount
Total Project Cost	160.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Project supports the immediate education response to the COVID-19 outbreak, while laying the groundwork for critical investments to preserve education human capital equitably over the mid-term and to face future shocks. It supports the Government of Turkey's efforts to mitigate rising pressures on education service delivery through distance learning for school-age children. COVID-19 caused by the 2019 novel coronavirus (SARS-CoV-2) has spread rapidly in more than 189 countries across the world since December 2019 . As of May 15, 2020, approximately 4.5 million cases have been detected across the world, with over 300,000 deaths. The first case was reported in Turkey on March 11, reaching 145,000 cases by mid-May 2020, out of which there have been more than 4,000 deaths. This operation is prepared under procedures for project for urgent need for assistance (para 12 of OP. 10).



To face the the present emergency and resilient recovery, the Project will improve the IT capacity of the education sector in Turkey through three components: (i) Emergency Connectivity and IT Infrastructure; (ii) Safety and Quality Content and Pedagogy; and (iii) Capacity Building for E-Learning Resilience. These components seek to minimize the period children and youth are without schooling, reducing learning loss. All schools and universities closed as a result of the COVID-19 pandemic. On March 23, 2020, MoNE initiated distance-based schooling. The learning losses due to COVID-19 will have a long-term impact on the economy. The current school closures will result in a loss of 0.6 learning adjusted years of schooling (LAYS) for all cohorts of students currently enrolled. Without remedial policy actions on timely many students from low-income families will drop out of school and never have opportunity to come back, early school leaving, and dropout will increase and loss in learning outcomes will be inevitable. Unless remedial efforts are in place to address these losses, country’s human capital will decline by 0.03. This means that in the long run when these cohorts with reduced educational attainment, lower learning achievement enter into the labor market in 15 years will have lower income, lower socioeconomic status which leads to lower GDP.

The timely support by this Project and other MoNE interventions also will contribute to prevent further fall back into functional illiteracy. In PISA 2018, the average OECD country has close to 20 percent of their students performing below the minimum proficiency level in reading – considered as the threshold for functional literacy - while in Turkey 26 percent performed below this level. Due to education disruption, students already performing low are expected to suffer higher learning losses. It is also estimated that the share of students performing below the level of functional literacy in PISA will likely increase to 37 percent without mitigation. Without major and timely effort to counter the effects of school closing shock will lead to long-run costs on human capital and welfare. Therefore, it is imperative for the country to move quickly to support continued learning, damage could be mitigated and even turn recovery into new opportunity.

The online education system, EBA, has been implemented in Turkey over ten years and the Government plans to sustain a blended instruction approach that students could use online for lesson preparation. However, due to the emergency nature of the response, the system has faced issues in catering to the sudden increase in the student-load as all classes moved to distance education. The effectiveness of current distance learning needs to be improved and expanded to reach all segments of the population, in order to prevent gaps across student populations from further widening. In Turkey, in the current situation, there already exists a wide learning gap between socio-economic groups. Students belonging to the poorest socio-economic quintile performed 87 PISA points (roughly equivalent to two years of schooling) behind students in the richest socio-economic quintile. The gaps will likely increase by 9 percentage points due to the school closures by the global pandemic. Therefore, an effort is needed to make the distance learning engagement more impactful.

The Project will emphasize equity, recognizing school closing and re-engagement affects vulnerable students the most. Students from remote areas, low socio-economic background, disabled, refugee or other non-native Turkish speakers, and from homes with parents less able or competent to support the home education efforts, face a higher risk of falling further back in their educational performance. Students from poorer social background, with large families in crowded households will find it particularly difficult to access and follow the distance education schedule. This is clearly reflected in the MoNE’s Equity Analysis (2020), which shows significant disparities in connectivity, access to devices and access to the EBA online system across poverty levels. Although, internet access by households ranges from 68% to 88% depending of the source, access to internet is still low among poor households with school age children (39%), and even lower for households with 3 or more children. When results were explored by quintiles



of regional poverty, inequalities in access to online EBA emerge. On average, only 9% of the students in the poorest regions connected to the online EBA system, while 29% of the students from in the richest regions connected to the system in the same period of time. In addition, girls may also be more disadvantaged than boys in accessing home-based education, as they be expected to undertake more household chores, particularly in large and/or conservative families.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will be implemented country – wide in Turkey. With a population of 83 million people and 783, 356 km² area, Turkey is located in Eurasia between the Black, Mediterranean, Marmara and Aegean Seas, bordering with Bulgaria, Greece, Syria, Iraq, Iran, Armenia and Georgia.

The project design includes three interrelated components addressing emergency response, transition and education system recovery. The project will support provision of services across the country through the use of existing data centers based in Ankara and new ones across the country or other countries (the latter to be defined within the scope of the feasibility study), as well as through an Education Technologies (EdTech) Innovation Hub which will be located in one of the technoparks in Ankara, and in Professional Learning Labs (PLLs) at school level. The project will mainly focus on upgrading the IT infrastructure of the EBA platform to increase its server capacity, digital content development for Education in Emergencies, teacher training and developing content for Parental Guidance and community engagement activities. There will be no major civil works but only minor refurbishment activities under Components 1 and 2, where IT infrastructure upgrade activities through utilization of the existing data centers in Ankara and other provinces if needed, and refurbishment for setting up an EdTech Innovation Hub and PLLs, respectively, will be the main items in terms of minor refurbishment. The EdTech Innovation Hub and PLLs under the Component 2, will be built up to engage clusters of experts, academicians, EdTech startups, school teachers/administrators and established companies in technology, education, research and innovation to support development of material, delivery technologies in distance learning. MoNE is planning to set this hub in one of the techno-parks in Ankara, which are located within university campuses. In order to incentivize partnerships within the EdTech and support development of digital content and education service delivery, the project will also develop a research and development (R&D) type of grant support mechanism (Innovation Start-up Grants and PPP proposals) for start-ups, companies, industry partners and universities to test and develop products, software, and hardware for educational uses within the network of innovation.

Key environmental issues are temporary and will be limited to those associated with minor refurbishment works at datacenters to be utilized, at PLLs for which equipment and furniture will be provided, and with minor renovation of the EdTech Innovation Hub. . These minor refurbishment and renovation which will be limited to walling and demolishing of some sections, electrical cabling and wiring, painting, establishment of fire fighting equipment, lightening, elevation of the floor with respect to electrical and data cabling projects, establishment of isolation system for the conference room. If needed, the existing equipment and electrical system in the building might be removed and disposed in line with respective Turkish regulations. Such minor refurbishment works may cause the generation of noise, dust, and construction waste (including asbestos, if relevant) and may also pose potential occupational



health and safety risks, which could be easily managed through applying national regulations in line with the WB Environmental Health and Safety Guidelines (EHSs).

The key social issues for the project are how the project will be most effective in providing access to continued quality education across all grade, K-12, in all parts of Turkey, and especially across social groups. The students from remote areas, low socio-economic background, disabled, refugee or other non-native Turkish speakers, and from homes with parents less ability or competent to support the home education efforts are at risk of falling further back in their educational performance. Further, girl students may be particularly challenged under the home schooling scenario, balancing expectations to help out with household chores against educational requirements. The COVID19 pandemic may exacerbate the existing inequalities and gaps in the education system, as well as adding new challenges in reaching all. The project design and its relevant activities under all components and through its impact monitoring under Component 3 aim to address these challenges and build in a system for developing equitable strategies for the vulnerable groups to better benefit from the distance learning opportunities.

D. 2. Borrower’s Institutional Capacity

The project will be implemented by the Ministry of National Education (MoNE). The Directorate General for Innovation and Educational Technologies (DGIET) at the MoNE will serve as the Executing Agency (EA) and will have overall responsibility for implementation, coordination, and oversight for SSDE implementation. The DGIET’s project implementation capacity will be strengthened by a dedicated SSDE PIU responsible for the preparation of the implementation plan, annual work plan and budget (AWPB), coordination, application of the of the SSDE Program activities, and implementation of the requirements of the Environmental and Social Framework (ESF). This SSDE PIU will be supported by technical specialists of the MoNE and technical consultants. Delivery will be coordinated with the support of other central-level agencies (CLAs), Provincial Level Education Directorates (PLEDs), and the District Level Education Directorates (DLEDs).

The SSDE project will benefit from MoNE experience with management and delivery of WB-funded projects such as the ongoing Disaster Risk Management in Schools (DRMIS) Project, which became effective on November 18, 2019, and the Education Infrastructure for Resilience (EIR) Project, implemented by a PIU within MoNE’s Construction and Real Estate Department.

However, for DGIET this project will be the first funded by WB and implemented under WB’s ESF. Therefore, the client needs additional support for managing environmental and social risks/impacts related to the project. In this respect, there will be one full time environment and one full time social experts in the PIU. The Bank will provide training to the PIU E&S staff on the new ESF and relevant ESSs.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Moderate

The environmental risk of the project is rated as Moderate as the anticipated risks and impacts associated with the project activities are temporary, reversible and easily manageable through application of the WBG EHS Guidelines,

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Good International Industrial Practices (GIIPs), national regulations and site-specific mitigation measures. Those risks are mainly associated with the implementation of activities under Component 1, minor non-structural refurbishment for the upgrade of IT infrastructure through utilization of the data centers, and under Component 2, the refurbishment work for setting the EdTech Innovation Hub within a techno-park, in one of the university campuses in Ankara, and PLLs at school level include the ones caused by the generation of noise, dust, and construction waste (including asbestos, if relevant) and also potential occupational health and safety risks.

The project will also finance the procurement of equipment to support effective teaching and learning through the improved distance learning platform, EBA. The operating environment associated with the installation and use of the IT equipment can have implications related to occupational health and safety risks as well as energy consumption, electronic waste generation and disposal etc. The environmental aspects to be considered in relation to the operation and functioning of the new developed systems for reaching out to 5 million users might include environmental risks and impacts such as efficient use of energy and electronic waste management. Such environmental considerations will be integrated into the Terms of Reference (ToR) documents of the feasibility studies to be implemented as a part of Sub-component 1.2. These aspects will be addressed through the Environmental and Social Management Framework (ESMF) which will incorporate the relevant WB ESHGs and GIIPs.

Social Risk Rating

Moderate

The social risk rating for the project is moderate. The project has an important positive impact in improving the distance learning system of the Ministry of National Education, called EBA and aims to improve access and minimize learning losses. The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant and they are predictable and expected to be temporary and/or reversible. No land acquisition or asset loss is expected, and minor refurbishment works are expected to be carried out within techno-parks, for the EdTech Hub, which are already designated areas managed by universities and hence, considered as public land with no prior use by private individuals for livelihood activities. The investments under Component 1 will cover Emergency Connectivity and IT Infrastructure for COVID-19 Response to scale up the IT infrastructure and connectivity for safe and social distancing schooling, covering (i) IT Infrastructure Strengthening; (ii) Content Delivery Network Services; and (iii) Public-Partnership for Wideband access for Schools, Teachers and Students. Component 1 (IT upgrade) and Component 2.2 (establishment of the EdTech Innovation Hub and Professional Learning Labs) mainly involves minor refurbishment works. Labor risks are low and associated with the refurbishment works, which has minor OHS risks and will be addressed under the Project's ESMF. Both the project design and the ESMF will provide an assessment and develop a monitoring framework for mitigation measures, to the extent possible.

The potential social risks are related to the contextual risk of distance learning systems which may exclude vulnerable groups of students. The students from remote areas, low socio-economic background, disabled, refugee or other non-native Turkish speakers, and from homes with parents less ability or competent to support the home education efforts, are at risk of falling further back in their educational performance. The Covid 19 pandemic thus exacerbate the existing inequalities and gaps in the education system, as well as adding new challenges in reaching all. These challenges have been addressed in the overall project design, particularly under Component 2 (see ESS1 section below for detail) which incorporate a number of measures to address/reduce the inequity risks and will be monitored during project implementation within Component 3.



SEP will serve also as an important tool for continuous community engagement and inclusion of vulnerable groups through out project implementation.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

This standard is relevant. The project activities under Component 1 comprising Emergency Connectivity and IT Infrastructure will provide immediate support to scaling the IT infrastructure and connectivity for safe and social distancing schooling for approximately 5 million students. Access to the online and interactive education platform (EBA) will be complemented with television and cellular-based courses and materials. It would finance additional servers, network devices, broadband internet, and Content Delivery Network (CDN) Services.

The additional servers and network devices under Component 1.1 will be installed and operating in one of the service providers' data centers. The operation of the data center can have environmental and social implications related to occupational health and safety, generation of electronic wastes, high energy consumption etc. The CDN services will be provided by the private sector actors as service procurement or as a cloud-based solution, which is to be determined based on the feasibility studies that will be conducted under Component 1.2. Under Component 2, MoNE will create EdTech Innovation Hub center and also set up PLLs at school level to bring together public and private sector specialists, teachers, and interested organizations. For this purpose, MoNE will rent a building in one of the techno parks in Ankara, Turkey to physically set up the EdTech Innovation Hub. The scale of refurbishments will depend on the building status yet to be rented, however, MoNE will refrain from large scale refurbishments that would affect the overall structure of the building. Therefore, the refurbishments will be limited to a minor scale such as walling, cabling, equipment integration, isolation materials etc. in an existing building which is yet to be determined. The environmental impacts associated with this activity could be noise and dust emissions, minor construction wastes (including disposal of existing electronic equipment if any) and exposure of workers to occupational health and safety risks.

In order to incentivize partnerships within the EdTech and support development of digital content and education service delivery, the project will also develop a R&D type of grant support mechanism (Innovation Start-up Grants and PPP proposals) for start-ups, companies, industry partners and universities to test and develop products, software, and hardware for educational uses within the network of innovation. The grants are expected to be utilized mostly for purchasing goods (equipment) and procuring consultancy services. Details of the grant selection and implementation arrangements, as well as consideration and assessment of associated environmental and social aspects will be determined within the scope of a feasibility study to be undertaken during project implementation. The ToR for the feasibility study will incorporate the tasks for addressing environmental and social aspects of the activities to be supported by the grants.

During the COVID-19 pandemic, students from remote areas, low socio-economic background, disabled, refugee or other non-native Turkish speakers, and from homes with parents less able or competent to support the home



education efforts, are at risk of falling further back in their educational performance. The risk of potential discriminatory impact of e-learning/home schooling scenario on vulnerable students is addressed in the project preparation through Component 2. During the emergency, the sub-component will provide outreach and targeted information in low-income and vulnerable areas and will form partnerships with other MoNE departments and international agencies providing complementary learning support programs to students with disabilities, those in hard-to-reach areas, and from other vulnerable households, including migrants and displaced populations. Cognizant of limited access to digital devices (laptops and tables), for the present COVID-19 school closures, the EBA content is being integrated and harmonized for delivery through non-digital channels, especially television. Applications for smart phones were also developed. Thus, the subcomponent will finance additional content developed to address the present emergency needs, both for curricular content and risk mitigation information and guidance. Priority support will be provided to teachers in digital instruction approaches and distance education.

Project design has included various strategies specifically targeting vulnerable groups:

- (i) Equity map, which will be monitored in terms of the expansion of EBA reach (from 300,000 to 1 Million to 5 million concurrent users) (attached, preliminary baseline equity analysis)
- (ii) Continued support for EBA TV, as an equity strategy to deliver educational content to poor families without digital devices
- (iii) Adaptation of digital educational program for special education: hearing impaired, visual impaired, and students in the autism spectrum
- (iv) Targeting and outreach for catch-up courses, and support for catch-up courses themselves (expected to benefit especially vulnerable students)

All these four measures taken as part of the proposed project design to target vulnerable groups will be monitored through project monitoring and impact evaluations under the Component 3 of the project.

The risks associated with the cybersecurity will be addressed through secure design of the system including but not limited to secure architecture and secure access for system users. The exact cybersecurity design will be integrated into the feasibility study to be implemented under sub-component 1.2. However, among others, a two-factor authentication system will be required for log-in into the platform. In addition to architectural measures, teachers' training modules under component 2 will also include cybersecurity risks and the means that teachers should follow to minimize such risks.

Under Component 3: Implementation Management, Monitoring and Evaluation for Education Technology Resilience, the Equity Targeting will be conducted, incl. vulnerability mapping and analysis of closing of digital access gap will contribute to addressing the potential social inequities in access and outcomes, and the planned Impact Evaluation will likewise provide important insights to this effect. Monitoring potential gender gaps will also be important.

The project is not expected to cause any direct irreversible or unmanageable impacts. It will not involve any involuntary resettlement or land acquisition, and no impacts on cultural heritage. Community health and safety risks as well as labor risks are expected to be low. Labor risks are mostly confined to low OHS risks associated with the minor refurbishment works and operation of data centers. Environmental risks are also expected to be moderate and temporary, mostly related to the minor physical works.



The risks and impacts summarized above will be addressed through the Environmental and Social Management Framework (ESMF) which will be prepared by MoNE. The ESMF will describe the procedures and responsibilities for carrying out the environmental and social due diligence of the grant activities under the feasibility study, and this will be also embedded in the grant manual. Moreover, the list of ineligible activities will also be defined in the ESMF as well as in the grant manual (i.e. no land or asset purchasing, no grants for activities that may lead to involuntary resettlement or major civil works). Further, the ESMF will define processes and arrangements for, and address the main aspects and issues to be considered under the environmental and social due diligence of the data center(s) yet to be determined under component 1.2 depending on the outcomes of the feasibility study and rented for the installation of additional servers and network devices under component 1.1. The ESMF will also identify procedures and institutional responsibilities for the identification of site-specific environmental and social impacts and development of adequate mitigation measures, for the minor refurbishment envisaged at the data center to be rented, at the building to be rented for the EdTech Innovation Hub Center, and at selected PLLs. This will be done during the project implementation within the scope of site-specific Environmental and Social Mitigation Plans (ESMPs), or ESMP checklists, depending on the scale of the refurbishment. The environmental, fire, quality standards as well as occupational health and safety and labor issues will be screened through the mechanism to be set up under the ESMF. For the operation of the datacenter and EdTech Innovation Hub Center, the ESMF will provide references to WB EHSs, GIIPs and acceptable OHS practices envisaged under the national regulations. The ESMF will be prepared, cleared by the Bank and disclosed by MoNE within 30 days after the project effectiveness. The feasibility studies under component 1.2, will also consider measures related to E&S in the selection of most appropriate means of expansion of the services to 5 million students. In this respect, ToRs for the feasibility studies will reflect E&S aspects of the options, such as electronic waste management and energy consumption. The ToRs will be finalized no later than 30 days after Project Effectiveness Date.

Finally, MoNE has drafted a Stakeholder Engagement Plan which sets out its community engagement through out project implementation and a process for project level grievance mechanism.

ESS10 Stakeholder Engagement and Information Disclosure

The standard is relevant. The stakeholder engagement plan has been drafted by MoNE before Appraisal and defines project affected parties (PAP) including vulnerable groups and those who would be more limited in their ability to take advantage of project benefits e.g. the vulnerable or disadvantaged groups may include and are not limited to the following:

- Syrians under temporary Protection (SuTP) and other refugees;
- Communities in hard-to-reach areas, including migrants and displaced populations with existing risks compounded by COVID-19;
- Children from homes of low socio-economic status, as they are most likely deprived from the distance learning, connectivity and devices with low ability to support to support home-based self-learning;
- Children with special educational needs incl. disabled children;
- Children from family environment less able to support home-based education (e.g. crowded households in congested housing);



The Stakeholder Engagement Plan acknowledges the challenges of broad consultations and continuous engagement across all stakeholder groups under the social distancing constraints imposed by the Covid19 pandemic. Both Component 1 and Component 2 of the project comprise activities which will strengthen the outreach and interaction with students, their parents/guardians and other stakeholders as part of the distance education effort, which will also benefit the implementation of the SEP per se. The stakeholder engagement activities will start during the early preparation of the project and will continue parallel with the implementation of the project. Due to Covid19 pandemic, consultations/SEP activities will be either virtual or conducted under the social distancing measures. Specific content to increase COVID 19 risk communication will be developed under Component 2 and communicated.

Particular efforts will take place to reach all the above listed vulnerable groups, and the efficiency in reaching them will be monitored through the project progress reports and followed up in relevant Broad-casting media as well.

As part of its SEP, MoNE will expand its current ministerial level GRM to have a dedicated GRM/hotline for the EBA platform only and this will be set up under the project financing. The details of the GRM is set out in the draft SEP.

The draft SEP has been disclosed on May 29, 2020 in country and will be virtually consulted before finalization of the SEP. Relevant translation/interpretation will be provided when consulting with vulnerable groups with language barriers (as part of differentiated measures to effectively engage vulnerable groups). MoNE has prepared an outreach strategy to also utilize the NGOs and local networks during consultations to receive feedback in addition to teachers who are closely working with the different vulnerable groups, as defined in SEP.

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B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

This standard is relevant. The standard will apply to 1) direct workers who will be PIU employees including existing civil servants of the DG and consultants hired by the PIU to support project implementation; and 2) the contracted workers who will be the employees of local firms that will be hired for scaling up of the Emergency Connectivity and IT Infrastructure and also both for the refurbishment and operation of the EdTech Innovation Hub. There will be no community workers involved.

Labor risks for direct workers are considered to be minor as all of them other than those civil servants seconded to the project will be hired per the Bank's procurement guidelines which will help reduce labor risks to a manageable level. Their low labor risks will be addressed through the Borrower's commitment in the ESCP to comply with the requirements of the ESS2, the Project's ESMF and the Project Operations Manual (POM) which provides clear steps to ensure compliance. Labor risks for contracted workers are also considered low, since the project would finance only upgrade of Connectivity and IT infrastructure.



Turkish Labor Code (No. 4857) is to large extent consistent with the ESS 2. Turkey ratified all the four Core ILO Conventions and OHS ILO Conventions. The main gap with ESS2 is related to the requirement for the grievance mechanism for workers. While the national legislation provides for Labor Courts to raise labor rights concerns, the Labor Code does not include specific requirements for workplace grievance mechanism. The Labor Code includes provisions to ensure contracted workers are paid, however, it does not include provisions regarding the selection, management and monitoring of contractors with regard to ESS2 requirements. Though, Labor Code applies to the types of workers who would be considered as contracted workers under ESS2 definition.

Law on OHS (No. 6331) governs workplace environments and industries (both public and private) and all categories of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries. Law is consistent with the requirements of the ESS 2. The partial gap exists in the requirement for the provisions of facilities – the law only requires provisions of canteens. The OHS law does not require an employer to prepare and overarching OHS plan.

Government of Turkey has prepared and issued various guidelines and measures, which are in line with WHO and other international standards, to be taken against Covid 19 pandemic risks related to civil works, OHS and for workplaces. These measures will be summarized in the ESMF and during the refurbishment activities and within the PIU workplace, those measures will be applied to ensure the well-being of the project workers.

For worker's grievances, MoNE has its own ministerial call center called MEBIM, which not only serves for parents and teachers but also for the MoNE employees. This will be utilized for the project workers apart from the new call center to be established as a dedicated project GRM for EBA platform.

ESS3 Resource Efficiency and Pollution Prevention and Management

The standard is relevant. In view of the nature of the project activities, no considerable environmental implications are envisaged in relation to minor refurbishments in the datacenters and EdTech Innovation Hub center and selected PLLs. These would be limited to dust, noise, minor construction wastes and exposure of the workers. The anticipated environmental risks will be considered within the scope of the ESMF and further assessed and addressed in detail in the site-specific ESMPs. The utilization of the data centers within the scope of Component 1.1 and Component 1.2, and the operation of the Ed Tech Innovation Hub center under Component 2 might be associated with generation of electronic wastes, high energy consumption etc., which will be assessed within the scope of the ESMF in line with WB EHSs and GIIP. The ToRs for the feasibility studies to be implemented for further expansion of the system to 5 million students will also address environmental risks and impacts such as electronic wastes and energy efficiency.

ESS4 Community Health and Safety

The standard is relevant though the risk is very low because due to the unlikely impact of temporary and minor nuisance caused by the implementation of the upscaling of Connectivity and IT infrastructure. Such nuisance will be duly addressed under the ESMPs to be applied by the client. The related risks will be addressed through the



application of WB ESHSs, GIIPs and electronic waste management practices. There is a contextual risk that the corona virus may continue to spread in areas where the project is implemented, although the project would rather reduce the risk through strengthening distance learning. Apart from expanding the efficiency of distance education, the project Component 2 covers Education and Communication for Social Distancing Measures and other Risks' Mitigation, targeted to different age-groups as well as to people with different disability types. There will be new content developed in order to communicate Covid 19 preventive measures for teachers, parents and student. Also content related to psycho-social support will be developed under Component 2 under the parental guidance content.

While the GBV/SEA risk associated with project activities are considered minor, international experiences indicate that the risk of domestic violence including GBV increases during the general lock-down and confinement of most/all family members to home. Reports of child abuse and maltreatment have spiked during the pandemic according to the Turkey-based International Association for Combating Child Abuse (UCIM). Ministry of Family, Labor and Social Services is closely monitoring to address GBV and domestic violence on children in Turkey. Similarly, MoNE, under its parental guidance advice will also develop relevant content for awareness raising and share mechanisms for reporting such abuse under Component 2 activities.

The concept of universal access is being embedded into the education services supported by this project, including for different student groups with different type of disabilities. The system will be designed with requirement to be accessible for students and teachers with physical disabilities (Component 1) and the content will be transformed into the format to be accessible to the above group of students and teachers (Component 2).

There will be no additional use of security personnel due to project activities, since data centers are already operational and have their own existing private security personnel. In case, additional security personnel is needed to support any of the project activities, the utilization of the security personnel will be in line with national laws and ESS 4 principles.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The standard is not relevant as there will be no restrictions on the use or access to land or any acquisition of land. The EdTech innovation hub will be on rental premises in techno-parks, which are already within university campuses and free from prior use by private individuals for livelihoods activities.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The standard is not relevant because the nature of the project activities will not cause any adverse impacts to biodiversity and natural resources.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities



The standard is not relevant, as there are no groups in Turkey meeting the definition of this standard.

ESS8 Cultural Heritage

The standard is not relevant because the physical project activities (up-scaling of connectivity and IT technology) will not have any impact on cultural heritage.

ESS9 Financial Intermediaries

The standard is not relevant because no Financial Intermediaries are involved in the project activities.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Public Disclosure

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to implement ES documents and support management of E&S risks, including at least one environmental and one social specialist responsible for ensuring full compliance with the ESSs, ESCP and relevant instruments.</p> <p>Activities that might commence earlier than appointment of ES staff of the PIU, will be managed by the existing PIU staff, and the staff of relevant departments of MoNE.</p>	07/2020
<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Prepare, adopt and implement an Environment and Social Management Framework (ESMF), in form and substance acceptable to the Bank.</p> <p>Provide and report on project opportunities for improving inclusion of vulnerable groups.</p> <p>The E&S aspects of the project activities shall be managed in line with WB EHSGs before the adoption of the ESMF, and throughout project implementation</p>	07/2020



<p>Complete, adopt, and implement, the ESMF and ESMPs in a manner acceptable to the Bank.</p>	
<p>MANAGEMENT TOOLS AND INSTRUMENTS Ensure the environmental and social aspects incorporated in the final Terms of Reference for the Feasibility Study for the IT infrastructure expansion of services.</p> <p>Prepare, adopt and implement the ESMPs and SEP in form and substance acceptable to the Bank.</p> <p>Incorporate environmental and social aspects into the ToRs for feasibility studies to be conducted for the grant program under component 2.</p>	<p>07/2020</p>
<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the ESMP into procurement documents with contractors. Thereafter ensure that the contractors comply with the ESMP specifications of their respective contracts.</p>	<p>07/2020</p>
<p>ESS 10 Stakeholder Engagement and Information Disclosure</p>	
<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</p> <p>Disclose, consult with stakeholders, finalize (based on the received feedback) and redisclose SEP</p> <p>Implement Stakeholder Engagement Plan</p>	<p>06/2020</p>
<p>PROJECT GRIEVANCE MECHANISM:</p> <p>Expand current GRM to facilitate uptake, logging and monitoring of grievances. Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p>	<p>07/2020</p>
<p>ESS 2 Labor and Working Conditions</p>	
<p>LABOR MANAGEMENT PROCEDURES</p> <p>Integrate the Labor Management Procedures (LMP) for the project as included in the POM, ESMF and ESMP.</p>	<p>07/2020</p>
<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Maintain, and operate a grievance mechanism for Project workers, as described in the ESMF and consistent with ESS2.</p>	<p>07/2020</p>

Public Disclosure



OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES	08/2020
Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP.	
ESS 3 Resource Efficiency and Pollution Prevention and Management	
ELECTRONIC WASTE MANAGEMENT PLAN:	08/2020
Prepare, adopt, and implement an Electronic Waste Management Plan as part of the ESMPs.	
RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:	08/2020
Incorporate resource efficiency and pollution prevention and management measures (including dust, noise, waste management etc.) into the ESMPs to be prepared under action 1.2 above.	
ESS 4 Community Health and Safety	
COMMUNITY HEALTH AND SAFETY:	08/2020
Incorporate specific measures in the ESMPs, in form and substance acceptable to the Bank.	
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	
ESS 9 Financial Intermediaries	

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

None

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Government of Turkey

Implementing Agency(ies)

Implementing Agency: Ministry of National Education of Turkey

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Joel Reyes, Binh Vu, Natalija Gelvanovska-Garcia
Practice Manager (ENR/Social)	Satoshi Ishihara Cleared on 28-May-2020 at 21:11:28 EDT
Safeguards Advisor ESSA	Nina Chee (SAESSA) Concurred on 02-Jun-2020 at 22:07:11 EDT