



TURKEY SAFE SCHOOLING AND DISTANCE EDUCATION PROJECT

Stakeholder Engagement Plan
Final

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ABBREVIATIONS

ALP	: Accelerated Learning Program
AWPB	: Annual Work Plan and Budget
CDN	: Content Delivery Network
CİMER	: Presidential Communication Center
CLA	: Central Level Agency
DGIET	: DG for Innovation and Education Technologies
DRRM	: Disaster Risk Reduction and Management
DYK	: Children attending supportive education courses
EBA	: Education Informatics Network
EiE	: Education in Emergency
ESF	: Environmental and Social Standards
ESCP	: Environmental and Social Commitment Plan
ESMF	: Environmental and Social Management Framework
ESS	: Environmental and Social Standards
FRIT	: Facility for Refugees in Turkey
IYEP	: Children attending the development program in primary schools
IT	: Information Technologies
KPI	: Key Performance Indicator
MEBİM	: Ministry of National Education Communication Centre
MoNE	: Ministry of National Education
NGO	: Non-Governmental Organization
PAI	: Project Area of Influence
PICTES	: Project on Promoting Integration of Syrian Kids Into the Turkish Education System
PIU	: Project Implementation Unit
PLL	: Professional Learning Lab
SEP	: Stakeholder Engagement Plan
SMC	: School Management Committee
SSDE	: Safe Schooling and Distance Education Project
SuTP	: Syrians under Temporary Protection
GFP	: Grievance Focal Points
GM	: Grievance Mechanism
GRS	: Grievance Redress Service
UNESCO	: United Nations Educational, Scientific and Cultural Organization
UNDP	: United Nations Development Programme
UNICEF	: United Nations International Children's Emergency Fund
WHO	: World Health Organization

1. Introduction/Project Description

An outbreak of the COVID-19 caused by the 2019 novel coronavirus (SARS-CoV-2) has spread rapidly across the world since December 2019, following the diagnosis of the initial cases in Wuhan, Hubei Province, China. COVID-19 has since been detected and reported in 189 countries/regions to date¹. As of May 13, 2020, more than 4.3 million cases have been detected across the world, with 294,879 deaths. The first case was reported in Turkey on March 11, with the number of reported cases climbing exponentially to more than 143,000 cases, of which there have been 3,952 deaths².

Since March 11, 2020, the Government of Turkey has gradually introduced a range of public health measures in line with WHO guidance³. Measures have included hygiene guidance to closure of major events, social venues, schools and all major commercial outlets, and recommendations to reduce transmission through physical distancing. The Government has also announced a total of TL240 billion (US\$34 billion) economic packages to reduce the impact on firms and targeted households, including deferral of social security and payroll tax on the part of firms, increasing the minimum pension, increased allocation for social assistance beneficiaries, and unspecified provisions for strengthening social services for the elderly.

On March 25, 2020, the Government of Turkey requested the Bank's support to enhance the digital and audio-visual education platform (EBA - Eğitim Bilişim Ağı) to reach the 18,108,860 students enrolled in K-12 education (15,088,592 in public schools, 1,440,577 in private schools, and 1,579,691 in open/distance education). The public-school system is obliged to use EBA as a complementary platform, while it is optional for private schools. The "EBA" learning platform is considered state-of-the-art, but the platform needs urgent upgrades to cope with the massive numbers of concurrent users created by the school closures.

In the education sector, all schools and universities were closed as a result of the COVID-19 pandemic. On March 23, 2020, MoNE initiated distance-based schooling. The Ministry of National Education (MoNE) is delivering distance education services during school closures due to COVID-19 through its online Education Digital Network, EBA (Eğitim Bilişim Ağı). Teachers, students, and parents have access to the EBA learning environment and interface which can be customized for student-specific learning, including calendar, supportive publications and library resources. Unfortunately, the EBA digital platform has proven inadequate to meet the needs of 18 million K-12 students and 1,1 million teachers now requiring additional distance learning services as a result of school closures. Through MEBİM, teachers and parents have reported issues associated with: i) access to the platform and issues with passwords; ii) delivery of incorrect grade content; iii) uploading students' homework; and iv) tracking progress of students and participants on the system.

Given the significant uncertainty of when schools can reopen, urgent investments are necessary to

¹ Johns Hopkins University Coronavirus Resource Center. <https://coronavirus.jhu.edu/map.html>

² Ministry of Health, Republic of Turkey, and Johns Hopkins University Coronavirus Resource Center.

³ See World Bank preliminary note for detailed description of the Turkish health system and pandemic response measures, "Republic of Turkey's Health System Response to Novel Coronavirus (COVID-19)", March 2020, unpublished.

ensure the MoNE online education platform can support quality distance-based schooling for students and teachers. EBA is a platform that can be strengthened and scaled up not only to respond to the present crises but as an investment for a more resilient delivery of education during different types of emergencies in Turkey. However, the digital education technology program was not fully completed as expected in terms of access and uptake by teachers, students and parents – which is crucially required now.-

The Turkey Safe Schooling and Distance Education (SSDE) Project aims to support Turkey's education sector to provide safe schooling through distance education during the COVID-19 pandemic and for resilient recovery. The proposed Project aims to respond to the COVID-19 needs for safe and interactive distance education and to continue to build a more resilient system for education technology. The Project will significantly contribute to the country's investments in Education Technology and builds the resilience of the education system in the face of crises.

An additional aspect of equitable strategies, MoNE will encourage its central and local network to include the vulnerable groups, low-income families and students, people under temporary protection although device support is not considered as a component of the Project. And further, although there is not a systematic approach to provide equipment for students from low-income families, throughout the process of distance education, local administrations have partially provided the equipment that students require to be able to follow education. Since it was not a coordinated initiative, information about these individual efforts are not recorded yet.

SSDE Project project design includes 3 interrelated components addressing emergency response, transition and education system recovery: (i) Emergency Connectivity and IT Infrastructure for Education in Emergencies; (ii) Digital Content for Safety and Quality; and (iii) Institutional Capacity for Education Technology Resilience. These are detailed next.

Component 1: Emergency Connectivity and IT Infrastructure for Infrastructure for Education in Emergencies: Component 1 consists of two subcomponents that are both dedicated to addressing an emergency situation in the education sector caused by the spread of COVID-19 and respective school closures in the country. Respectively subcomponent 1.1 will address urgent response to ongoing emergency by expanding existing EBA platform and subcomponent 1.2 will address accelerated transition to full scale distant learning solution by financing design, procurement, implementation and testing of the new system. Such new system will also improve sector's resilience to potential future emergencies. Implementation of both subcomponents will be concurrent (not sequential, that is, starting dates of the two subcomponents are the same).

This component would scale up access to distance learning during COVID-19 school closure by building the education sector IT capacity to provide safe and equitable digital-based learning. The underlying IT infrastructure, current EBA platform and connectivity needed to deliver online education will be enhanced from the current capacity of 300,000 students (simultaneous system users) to 600.000-1 million concurrent system users during the emergency period, and for national reach of approximately 5 million (simultaneous system users) K-12 students through the new system after the emergency period. Current EBA system will be enhanced for COVID-19 emergency period, and the new educational online platform will be developed to provide equitable access to students and teachers with physical disabilities within the project duration.

The Component 1 will consist of two subcomponents:

Subcomponent 1.1: COVID-19 School Closure Response subcomponent will focus on the most urgent emergency needs to sustain operation of the current online education system (EBA). It is anticipated that activities planned under this subcomponent will be completed within 3 months; it is also understood that in case extension is required, such extension cannot exceed additional 3 month (6 months in total). Ministry has assessed that it is critical to increase simultaneous access to the online system of 600,000-1 million students in approximately 3 months to support the ongoing education process. During this period, system usage will be extended from 300,000 to up to 600,000-1 million students (simultaneous system users). In order to achieve this, the project will finance enhancements of the current EBA system and strengthening of the underlying related IT infrastructure. During the COVID-19 school closures in order to bridge the gap, access to an online and interactive education platform (EBA mobile and web platforms) will be complemented with courses and materials delivered through television. During the Emergency Phase the system will also be enhanced for accessibility to ensure equitable access by students and teachers with physical disability.

Subcomponent 1.2: Resilient Digital Education System will extend use of the educational online platform from 600,000-1 million concurrent students to 5 million (simultaneous system users) and 100,000 simultaneous virtual classrooms. Given that the current EBA system architecture is not designed to serve that number of simultaneous users, the project will finance a new higher capacity platform and identified digital horizontal infrastructure expansion such as data centers with more storage and processing capabilities or migrating to cloud platform as a service (PaaS) providers, new software architecture, infrastructure as a service, testing and cybersecurity, learning analytics system, and new CDN architecture. The procurements such as service or hardware for the data centers, consultancies, feasibility studies, know-how, etc. at Component 1.1 can also be used at Component 1.2 to the extent that those are compatible with the new system.

Component 2: Digital Content for Safety and Quality: This component would support the distance education content, both during the period of school closures due to COVID-19 and also for a gradual return to classroom-based teaching which is expected to require a more “blended” (on-line and face-to-face) approach. Also, it will build an “Ecosystem” to support continuous digital educational content development, training and blended digital-classroom delivery through partnership with parents, teachers, students, community actors, universities and other education content developers as well as developers of content delivery technology and pedagogical tools.

In general, the component will support immediate and medium-term improvements to the available curricular content. EBA has available a broad range of materials (videos, applications, games, etc.) aligned to curricular needs for pre-school, primary, lower secondary and upper secondary education. On the other hand, a specific ecosystem will be established to increase the quality and quantity of digital contents and education technologies. It will be implemented through two subcomponents, the first focused on the short-term needs of school closure and gradual re-opening due to COVID-19, and the second on building the longer-term education digital content ecosystem

for materials and pedagogical tools needed for distance education and blended classes (classroom-online). The two sub-components are:

Subcomponent 2.1 Digital Content and Pedagogical Support During School Closures and for School Re-opening: This subcomponent will support the e-learning needs during school closures and re-opening due to the present COVID-19 emergency. It will support the adaptation of digital content within the existing EBA platform as well as for television delivery. It will include curriculum aligned digital materials for grades K-12, digital literacy support materials, and messages for COVID-19 safety and other disaster risk reduction and management (DRRM).

Subcomponent 2.2: Education Innovation and Participatory Ecosystem: This subcomponent will establish a sound collaboration and communication with all stakeholders and target groups for the on-going development of digital education materials, pedagogical tools and teacher development. The main implementation strategy is the design and implementation of an inclusive digital content & education technology development ecosystem for education in emergency and normalization times as a result of building the premises of the system improvement and capacity building of EBA Platform. The ecosystem structure will include an “EdTech Innovation Hub” for development and testing of educational digital materials, and “Professional Learning Lab (PLL) to support pedagogical and organizational improvements at the school level.

SEP is a part of Community Engagement and the estimated budget is planned to be under the Component 2 expenditures. On the other hand, as a part of Grievance Mechanism, a specific call center will also be established within the project budget.

Component 3: Institutional Capacity for Education Technology Resilience

This component will strengthen MoNE’s structures for the coordination, management, monitoring and evaluation of the project and to sustain the delivery of safe and equitable digital education services. The component includes support for monitoring of project inputs, activities and outputs. For new interventions, such as the development of the EduTech Innovation Hub and blended learning approaches, rigorous impact evaluations will be conducted to inform policy and program scale up. Studies and technical assistance also will build MoNE’s preparedness to future crises, while responding to the education challenges of the COVID-19 pandemic. It includes two sub-components:

Subcomponent 3.1 Project Management, Monitoring and Impact Evaluation: This subcomponent will support the planning, executing, monitoring, controlling and impact evaluation for each component of the project to deliver safe and distance education. The monitoring, controlling and, research activities and impact evaluation will be financed by this subcomponent.

Subcomponent 3.2 Lessons Learned for Education in Emergencies and E-Learning Resilience: This subcomponent will finance assistance and technical knowledge to consolidate the capacity of MoNE’s Education Technology System to address the uncertain extent of the COVID-19 crises, as well as to be better prepared to face any future crises.

For new interventions, such as the development of the EdTech Innovation Hub and blended learning approaches, rigorous impact evaluations will be conducted to inform policy and program scale up. Studies and technical assistance also will build MoNE's preparedness to future crises, while responding to the education challenges of the COVID-19 pandemic.

Turkey Safe Schooling and Distance Education Project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard ESS 10 Stakeholders Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. In the context of infectious diseases, broad, culturally appropriate, and adapted awareness raising activities are particularly important to properly sensitize the communities to the risks related to infectious diseases.

2. Brief Summary of Previous Stakeholder Engagement Activities

When the COVID-19 process started in Turkey, MoNe rapidly organized for distance education activities. In this context, primary and secondary education and high school education has begun to be delivered via television in collaboration with TRT (Turkish Radio Television) and MoNE. Directorate General for Innovation and Educational Technologies (DGIET) has had the key responsibility in distance education with EBA platform. All the students together with their families and guardians and teachers could access the digital educational content provided on EBA. To facilitate the access to EBA, GSM operators supported the process by providing internet package support for students and families to access EBA from home. Upon the decision of distance education made by the Ministry of National Education, free monthly internet support provided to all users by the GSM operators for EBA mobile access was increased from 3 GB to 6GB by Turkcell and Vodafone, and to 8 GB by Turk Telekom, Pttcell, Teknosacell, Bimcell and Vestelcell. Users have free access to EBA content up to 8 GB per month. In addition, local administrations provided equipment support for students in need. This way, the end users and target group of EBA are actively participating in distance education and EBA.

The expansion of the EBA platform provided the opportunity to also expand its use to obtain important feedback from teachers, parents and students at national level. Teachers and parents sent comments and requests related to the existing distance learning program, but also more general requests, opinions and complaints are frequently received from students, teachers and parents alike. The two-way feedback mechanism has contributed to EBA's continuous development.

During the period 23rd March-1st May 2020, through the support section of EBA (EBA Destek), teachers and parents have submitted more than 52,800 e-mails. The topics of the e-mails were mainly about distance learning, the functioning of EBA, and the educational materials. In addition, in order to address the inquiries and support the needs of families, guardians, teachers and students, a specific online assistance (chatbot) system (EBA Asistan) was designed and implemented in the homepage of the EBA platform (on 13rd April 2020). To date, EBA Asistan has answered 5,356,315 questions.

All communication mechanisms of MoNE and DGIET mentioned above, have been put into operation to meet the demands of all stakeholders. A great deal of feedback from MEBİM (call center), CİMER (Presidential Communication Center), EBA Destek and EBA Asistan have been collected and analyzed. While most communication with the various stakeholders was related to questions, queries and comments about the distance education rather than complaints, such queries at the same time reflected on the functionality of the system and thus has been very valuable feedback for MoNE. DGIET thus benefitted greatly from all feedback which contributed to the preparation process of the SSDE project design. The feedback from all stakeholders is continuously being collected and will be used during the implementation phase of SSDE Project.

2.1 Disclosure and Feedback from Consultations

Between May 29th till June 5th 2020, MoNE disclosed the draft Stakeholder Engagement Plan in-country and made it public for virtual consultations, due to the social distancing measures and restrictions under the COVID 19 pandemic. MoNE publicized the disclosure and asked public for feedback through its social media channels, website and email accounts.

In order to engage vulnerable groups when consulting, MoNE utilized NGOs and local networks to consult and receive feedback from students, parents of these vulnerable groups. During consultations, more than 6000 views/feedback/concerns/demands were received from provincial directorates of MoNE, teachers, students, parents, international institutions (ie. UNICEF) and NGOs shared with MoNE. A detailed summary of consultations is attached in Annex-1. The main topics that came out from the feedback process was:

- Device support,
- Free Internet provision for live lessons broadcasting on internet/TV,
- Training activities for teachers, students and parents to increase digital literacy
- Promoting Parents' participation,
- A national live lessons program,
- Increasing Internet access in rural areas,
- Integrating monitoring and evaluation,
- Attendance report in distance education.

MoNE has already considered majority of the comments and integrated into project design. On the device support, especially for the vulnerable groups, this is already considered through the support of local authorities and networks and improving accessibility and equity will also be part of the Research and development program support areas in order to ensure equitable distance education for all.

3. Stakeholder Identification and Analysis

Project stakeholders are defined as individuals, groups or other entities who:

- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- (ii) may have an interest in the Project (‘other interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

3.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;

- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status⁴, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.2. Affected Parties

Affected Parties include the national student population from Kindergarten to Grade 12 (K-12) as well as all teaching staff, local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Approximately 16.5 million students and 1.1 million teachers in K-12 public and private schools, who are obliged to follow the EBA distance-based course schedule in three shifts during the days;
- Teachers trained through the project via online platforms (on distance-based pedagogical practices, classroom organization, and IT support);
- Parents and guardians who will undergo special programs to cope with COVID-19 emergency home-schooling
- Households and communities reached with COVID-19 risk mitigation and educational information and materials;
- Ministry of National Education (MoNE) staff and consultants;
- Provincial Level Education Directorates and District Level Education Directorates,
- School Management Committees (SMCs) at local/school level;
- Public institutions directly involved with the project or responding to the COVID-19 emergency such as the Directorate General for Innovation and Education Technologies (DGIET) and other directorate generals (DGs) responding to the COVID-19 emergency.

3.3. Other Interested Parties

The projects' stakeholders also include parties other than the directly affected communities, including:

- Approximately 1.5 million students in open education who may benefit indirectly by accessing educational materials and other references from EBA.
- Lifelong learners (adults) who may benefit indirectly by accessing educational materials and other references from EBA.
- Ministry of Health;
- Ministry of Family, Labour and Social Services;
- Ministry of Treasury and Finance;
- Ministry of Industry and Technology;

⁴ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

- Experts, academicians, edutech startups and established companies in technology, education, research and innovation;
- National/international internet service providers;
- Civil society groups and NGOs on regional, national and local levels
- Business owners and providers of services, goods and materials within the project
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations
- United Nation’s specialized agencies such as UNESCO, UNICEF, WHO, UNDP;
- Other international aid or financing agencies.

3.4. Disadvantaged / Vulnerable Individuals or Groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups to be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person’s origin, gender, age, health condition, economic problems, disadvantaged status in the community dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, 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 (students with visual and hearing impairments will be addressed);
- Children attending the development program in primary schools (IYEP);
- Children attending supportive education courses (DYK)
- Children of martyrs and veterans

Furthermore, the risk of family environments not able to support the self-learning is higher in vulnerable groups. Vulnerable groups within the communities where the project will be implemented will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

Many international organizations with the participation of UN Agencies, Bilateral Donors and EU funded programs, such as the Facility for Refugees in Turkey (FRIT) are supporting MoNE to respond to COVID-19, by adapting their education programs, and developing new “education in emergencies” (EiE) strategies. For example, UNICEF has is providing awareness and communication programs on risk reduction for education communities, providing various distance education support tools through their country and global websites, as well as adapting their accelerating learning program (ALP). UNICEF is also providing direct support to MoNE during school closure pandemic, including distance education for students in the autism spectrum and other developmental challenges. GiZ and other donors are supporting technical and vocational education and youth-at-risk. The EU, under its Facility for Refugees in Turkey program, finances various education programs for Syrians under Temporary Protection (SuTP), including directly through MoNE and its Program for Inclusion of Syrian Children into the Turkish Education System (PICTES). The project will support all these programs which are in dire need of a strengthened digital education of platform to continue to provide their education programs for vulnerable groups during COVID-19 school closures.

4. Stakeholder Engagement Program

4.1. Summary of Stakeholder Engagement Done During Project Preparation

For social communication and involvement, safe and distance education program is especially targeting parents and guardians to facilitate their involvement in the distance education programs of their children, as well as disseminating COVID-19 protection and risk mitigation information. MoNE is also sensitizing key groups including policy makers, the media, private sector and NGOs to form partnerships for safe education delivery during the COVID-19 crisis. The project will monitor the number of partnership protocols signed and implemented by DGIET.

4.2. Summary of Project Stakeholder Needs and Methods, Tools and Techniques for Stakeholder Engagement

Different engagement methods are proposed and cover different needs of the stakeholders – but in view of the COVID-19 crisis, direct face-to-face consultation and interaction have to be avoided in favour of digital interaction, electronic media and print:

4.3. Proposed Strategy for Information Disclosure

A preliminary strategy for information disclosure is as follows:

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
<i>During Project Preparation</i>	<i>Government entities; students and their parent/guardians, local communities; vulnerable groups; NGOs and academics; educational staff; media representatives; others</i>	<i>Project concept, E&S principles and obligations, documents, Consultation process/SEP, Project documents-ESMF, ESCP, GM procedure,</i> <i>Update on project development</i>	<i>Dissemination of information via MoNE and EBA website, Social Media, SMS (if available) supplemented by TV and radio broadcasting; and online meetings, including with vulnerable groups while making appropriate adjustments to formats in order to take into account the need for social distancing. Press releases in the local media.</i>
<i>During Project Implementation</i>	<i>MoNE staff and consultants, DGIET, Provincial & District Level Education Directorates, other government entities; students and their parent/guardians, local communities; vulnerable groups; NGOs and academics; educational staff; media representatives; others</i>	<i>Project documents, , SEP, relevant E&S documents, GM procedure, regular updates on Project development</i>	<i>Public notices; Electronic publications and press releases on the MoNE and EBA website & via social media; Press releases in the local media; Consultation meetings, separate focus group meetings with vulnerable groups, while making appropriate adjustments to consultation formats in order to take into account the need for social distancing (e.g., use of mobile technology such as telephone calls, SMS, etc).</i>

4.4. Stakeholder Engagement Plan

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
<i>Preparation</i>	<ul style="list-style-type: none"> <i>Need of the project</i> <i>planned activities</i> <i>E&S principles, Environment and social risk and impact management/ESMF</i> <i>Grievance Redress mechanisms (GM)</i> 	<ul style="list-style-type: none"> <i>Public notices; Electronic publications and press releases on the MoNE and EBA web-site & via social media; MEBIM queries; press releases in the local media; Consultation meetings, virtual or actual consultations, incl. separate focus group meetings with vulnerable groups, while making appropriate adjustments to consultation formats in order</i> 	<i>MoNE staff and consultants, DGIET, Provincial & District Level Education Directorates, other government entities; students and their parent/guardians, local communities; vulnerable groups; NGOs and academics; educational staff; media representatives; others</i>	<i>MoNE-(DGIET)/PIU</i>

		<i>to take into account the official normalization schedule and the need for social distancing (e.g., use of mobile technology such as telephone calls, SMS, etc).</i>		
<i>Implementation</i>	<ul style="list-style-type: none"> • <i>Project scope and ongoing activities</i> • <i>ESMF, ESMP and other instruments</i> • <i>SEP</i> • <i>GM</i> 	<ul style="list-style-type: none"> • <i>Electronic publications and press releases on the MoNE and EBA web-site & via social media; Press releases in the local media; Consultation meetings, separate focus group meetings with vulnerable groups, while making appropriate adjustments to consultation formats in order to take into account the official normalization schedule and the need for social distancing (e.g., use of mobile technology such as telephone calls, SMS, etc)</i> 	<i>MoNE staff and consultants, DGIET, Provincial & District Level Education Directorates, other government entities; students and their parent/guardians, local communities; vulnerable groups; NGOs and academics; educational staff; media representatives; others</i>	<i>MoNE-(DGIET)/PIU</i>

In addition to this national SEP, the MoNE will also encourage provincial directorates of MoNE to develop a locality-based strategy whereby District Level Education Directorates will engage with different local stakeholders in addition to teachers checking on each student every day. These locality-based strategies will be specifically tuned to the local conditions, stakeholder profiles and needs.

4.5. Future of the Project

Stakeholders will be kept informed through the EBA’s digital platform, which apart from its e-learning to K-12 students also is designed to ensure a continuous dialogue between teachers and parents/guardians. Here reporting on project performance and implementation of the stakeholder engagement plan and grievance mechanism will also be published.

5. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.1. Resources

The budget for the SEP is about 1 M USD.

5.2. Management Functions and Responsibilities

The project implementation arrangements are as follows: 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 and application of the SSDE Program activities. Delivery will be coordinated with the support of other central-level agencies (CLAs), Provincial Level Education Directorates (PLEDs), and District Level Education Directorates (DLEDs). Evaluation and Monitoring activities for the project will be conducted by PIU in data driven and evidence-based approach. The data collected in new EBA platform will be analysed and specific success indicators will be developed for a sound monitoring and evaluation process. Data mining, statistical analysis, assessment&evaluation and data visualization experts and academicians will be hired in the PIU.

DGIET will be responsible for carrying out stakeholder engagement and a specific call center will be established under Component 2 to manage the Grievance Mechanism.

The stakeholder engagement activities will be documented through the project progress reports every six months.

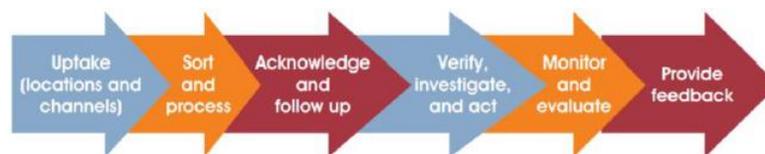
6. Grievance Mechanism

The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Supports accessibility, anonymity, confidentiality and transparency in handling complaints and grievances;
- Avoids the need to resort to judicial proceedings.

6.1. Overview and Structure of GM

The operational flow of Grievance Mechanism for the stakeholders is as follows (Fig. 1):



Source: Agarwal, Sanjay and Post, David. 2009. Feedback Matters:

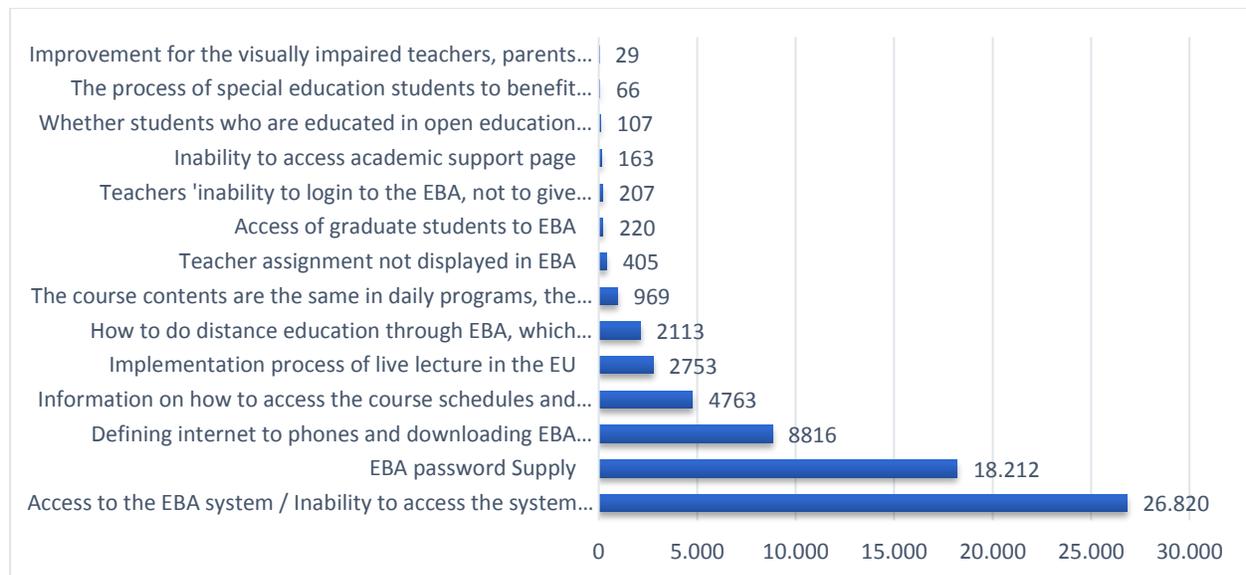
Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects – Part I. SDV. World Bank.

The overall process for the GM will also be described in detail in the Project Operations Manual comprised of 6 steps: (1) uptake (2) sorting and processing (3) acknowledgment and follow up (4) verification, investigation and action (5) monitoring and evaluation and (6) feedback.

MoNE has a hotline (call center) called MEBİM (#444 0 632), which serves also as a ministerial level grievance mechanism for its employees, teachers, partners and parents. Inquiries, demands, complaints about all education services provided by MoNE are responded by a professionally managed call center with 180 personnel (2018). This call center has been also resolving issues related to the digital education platform (EBA). During the distance schooling time between 23rd March-28th April 2020, due to the sudden demand for the EBA platform there have been 65,643 applications (inquiries/demand/complaint etc) from families, guardians, teachers and students. The distribution of the MEBİM applications by topics are shown in the graphic below: Highest number of applications are about access problems and issues related to logging on to the platform during office hours. Second are about obtaining a user password for the platform and the mobile application related inquiries takes the third place.

Due to the increased demand to EBA platform and to reduce the waiting time on MEBİM call center, MoNE (DGIET) decided to set up a dedicated call center solely for EBA platform. This will be financed under the SSDE project.

The breakdown of the MEBİM applications are depicted below:



MoNE has on its website defined service standards in relation to a wide range of queries and complaints. In case of queries received from citizens, the following standards apply⁵:

⁵ http://www.meb.gov.tr/en/assets/doc/Meb_Service_Standarts.pdf

**MINISTRY OF NATIONAL EDUCATION
SERVICE STANDARDS OF PRESS AND PUBLIC RELATIONS CONSULTANCY**

Item Number	NAME OF SERVICE	DOCUMENTS REQUIRED IN THE APPLICATION	SERVICE COMPLETION DURATION (MAXIMUM)
1	Responding to Requests from Citizens by Call (Question, Request, Opinions, Suggestions, Implementation Support and Administrative Issues)	T. C. identification number	3 Days
2	Responding to Inquiries from Citizens	Petition (Applicant's name and surname, signature, home or work address, if the applicant is a legal person, the name and address of the legal person and the petition containing the signature and authorization document of the authorized person)	15 Days
3	Responding to Citizens' Applications within the Scope of the Right of Petition	Petition (Name, surname and signature of the petitioner, work or residence address)	30 Days

In case of any other document not mentioned above is required by the Ministry or the request is not fulfilled within the specified time despite the application is made with full documentation or if it is determined that some services in the table above are missing, an application can be made to the first or second point of contact below.

First Contact for Application	Press and Public Relations Consultancy	Second Contact for Application	Press and Public Relations Consultancy
Name	Harun AKCA	Name	Übeydullah YENER
Title	Contact Center Branch Manager	Title	Press and Public Relations Consultant
Address	Atatürk Bulvarı No:98 Bakanlıklar/ANKARA	Address	Atatürk Bulvarı No:98 Bakanlıklar/ANKARA
Phone	0 (312) 413 27 89	Phone	0 (312) 413 10 54
Fax	0 (312) 413 64 00	Fax	0 (312) 418 64 00
E-mail	harun.akca@meb.gov.tr	E-mail	uyener@meb.gov.tr

Target groups have also used CIMER (Presidential Communication Center) as an appeals mechanism in addition to the MEBIM service. Nearly 1,000 CIMER applications related to EBA platform were also directed to MoNE and responded in the stipulated time frame by MoNE personnel. CIMER is staffed with around 30 people.

Both MEBIM and CIMER issue fines to institutions in cases where complaints are not resolved in a timely manner.

In addition, all kinds of exploitation / abuse (acts involving psychological and physical violence, mobbing, sexual assault, harassment, disrupting the work environment) against those who commit crimes in the workplace of the MoNE as specified in the relevant relevance (Civil Servants Law, Turkish Labor Law). actions, etc.) and is in line with the World Bank's guidance⁶ policy on harassment and abuse. If an employee is faced with such a problem, they can contact a higher authority or go directly to the police station, as specified in the country's national referral system, to deal with such cases. The content and procedures of the new grievance mechanism will have a reporting line on such cases and will be handled in full confidentiality.

⁶ <http://pubdocs.worldbank.org/en/63251158318586/ESF-GPN-SEASH-in-major-civil-works.pdf>

Within the scope of the project, the existing Grievance Mechanism (GM) of MEBIM Call Center will be expanded by adding a new call center dedicated to EBA and adapted in line with the specific needs of the project to collect and evaluate grievances and demands by the teachers, MoNe's employees, parents and students and all other related stakeholders on EBA platform.

The GM will be accessible to a broad range of Project stakeholders who are likely to be affected directly or indirectly by the project. These will include beneficiaries-teachers and parents-, community members, project implementers/contractors/service providers etc—all of who will be encouraged to refer their grievances and feedback to the GM. The GM will also allow anonymous applications through its online and phone feedback channels of the new call center developed under the project.

The GM can be used to submit complaints, feedback, queries, suggestions or compliments related to the overall management and implementation of the project, as well as issues pertaining to services that are being financed and supported by the project, including:

- Mismanagement, misuse of Project Funds or corrupt practices.
- Violation of project policies, guidelines or procedures, abuse or any exploitation / abuse at work or any misconduct / abuse of office.
- Disputes relating to resource use restrictions that may arise between or among affected communities.
- Grievances that may arise from members of communities who are dissatisfied with the project activities, or actual implementation of the project
- General feedback, questions, suggestions, compliments.

The SDDE project GM will establish clearly defined timelines for acknowledgement, update and final feedback to the complainant. To enhance accountability, these timelines will be disseminated widely to Project stakeholders. The timeframe for acknowledging the receipt of the grievance is 3 days. Addressing and responding to feedback is 15 business days from the time that it was originally received, and this period is subject to extension upon the written consent of the MoNE PIU head.

The structure of the grievance mechanism for the project will be comprised of three levels:

1-EBA Call Center Level. This call center will be newly set up in addition to the existing MEBIM hotline. This center will serve only to queries/suggestions/complaints related to distance education platform, EBA of the Ministry in order to achieve an effective GM. To ensure that the GM is accessible to parents/guardians and teachers at the community level, they will have the option to report their complaint/feedback to designated grievance focal points (GFPs) who are staff in the provincial level directorates of MoNE. Once the new call center is established and contact details of the hotline are known the SEP will be updated and redisclosed publicly.

2- PIU Level, Directorate General for Innovation and Educational Technologies (DGIET). If there is a situation in which there is no response from the EBA call center/hotline, or if the response

is not satisfactory then complainants and feedback providers have the option to contact the PIU directly to follow up on the issue. The PIU's grievance focal point(s) will be responsible for such complaints and issues related to the project and its components. The PIU Director will make a final decision after a thorough review of the investigation and verification findings.

3-Appeal Mechanism. If the complaint is still not resolved, the complainant may escalate/appeal to a higher level of GM within the project at the Ministerial level. If s/he is not satisfied with the decision, then s/he can submit his/her complaint to the Presidency's Communication Center or to appropriate court of law.

The process of handling grievances will be as follows:

1. There are multiple channels for submitting grievance and concerns. Grievances can be submitted by the following channels:
 - a. Telephone (dedicated hotline # 147 or through 444 0 632 or through the new hotline for EBA)
 - b. E-mail, fax
 - c. Written, verbal through provincial level directorates of MoNE (which are located in all 81 provinces in Turkey).
2. All the grievances received through the above channels are collected at the GM section in DGIET, and the grievances received are recorded in the central database;
3. DGIET GM Officer contacts the person who filed the grievance to confirm the receipt of the grievance by telephone and/or email within 3 days;
4. DGIET GM Officer verifies the grievance, investigates and prepares the draft response and submits it for the approval of the Project Management. Following the response, Grievance/ Complaint Form is updated according to the outcome of the process and the complainant receives the result within 3 days, alternatively in 15 working days in case of corrective action required;
5. A monitoring- evaluation system is established for the grievances. Monitoring process of grievances is recorded in the monitoring and evaluation system.;
6. With the acceptance of the resolution by the applicant within 30 days, the case is closed. In case the applicant is not satisfied with the response and do not sign-off Complaint Form, the DGIET GM Officer will organize a (virtual) meeting with the management, participation of associated members of the DGIET related with the complaint. The complainant may participate by phone in this meeting to communicate on his/her concern to the management. The meeting aims to propose another solution to the complaint, agreeable to both parties.

6.2. World Bank Grievance Redress Mechanism

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the Bank's independent Inspection Panel which

determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's corporate Grievance Redress Service (GRS), please visit: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7. Monitoring and Reporting

7.1. Involvement of Stakeholders in Monitoring Activities

The Social Assessment as part of ESMF completed by MoNE will be updated on a continuous basis through the project M&E system and supplemented by monthly outreach via telephone/media or Internet to students and parents/guardians to obtain feedback on the usage and the adequacy of the distance learning modules and approaches. This will be supplemented by comments collected from the the feedback mechanism on the MoNE electronic platform.

7.2. Reporting Back to Stakeholder Groups

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. [Monthly] summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The [monthly] summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- a) Publication of a standalone annual report on project's interaction with the stakeholders;
- b) A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
 - (i) Number of parents/guardians/users accessing information about EBA via EBA platform.
 - (ii) Number, consultation meetings and other public discussions/forums conducted within a reporting period (i.e. monthly);
 - (iii) Number of public grievances received within a reporting period (i.e. monthly) and number of those resolved within the prescribed timeline;

- (iv) Number of reports and roundtables on distance education, education in emergency response and other related topics published/broadcasted in the local, regional, and national media;
- (v) Monthly Call Center reports.

ANNEX-1 SUMMARY OF PUBLIC CONSULTATIONS

After the global Covid-19 pandemic was first seen in Turkey, the Ministry of National Education started distance education on March 23rd, 2020 in order to provide continuous education and provide safe schooling. The distance education provided through EBA TV has been supported and complemented by EBA platform. On the other hand, the Directorate General of Innovation and Educational Technologies has taken a step towards realizing the Turkey Safe Schooling and Distance Education (SSDE) Project financed by the World Bank in order to provide a safe distance education, building on the capacity of EBA in terms of both infrastructure and content, and create a digital content-learning technology ecosystem. Complying with the World Bank's Environmental and Social Framework, the Project is expected to contribute significantly to the investments of educational technology in Turkey and increase the resiliency of the education system during the crises and normalization processes.

Opinions/ideas and suggestions of all stakeholders are very important for the operationalization of the project. "Stakeholder Involvement Plan" and "Environmental and Social Commitment Plan" have been prepared and disclosed for the public access and opinion, under "SSDE Project" at the homepage of <http://yegitek.meb.gov.tr> and under the "Projects" section as well.

This report includes the opinions and suggestions received from Provincial Directorates of National Education, opinion form at yegitek.meb.gov.tr, other departments and units of the Ministry, and non-governmental organizations.

1- FEEDBACK FROM PROVINCIAL DIRECTORATES OF NATIONAL EDUCATION

The opinions received from the Provincial Directorates of National Education have been categorized under Project components. Accordingly, the following are the opinions and suggestions:

1.1 Component on Connectivity and IT Infrastructure During Emergency

- Providing devices in order to enable students and teachers to participate in distance education;
- Providing free or low-cost Internet connection for distance education;
- Strengthening the Internet infrastructure in rural areas;
- Strengthening the Internet infrastructure of schools;
- Eliminating server failures;
- Enabling that all improvements work properly on every device;
- Increasing the capacity of concurrent users;

- Enabling the offline use of content to be developed;
- Developing a domestic software for live courses;
- Enabling that EBA has a user-friendly interface.

Solutions proposed to the mentioned suggestions are given below:

- ✓ Providing devices to teachers and students by signing contracts with GSM companies and other companies, or providing free devices to students from low socio-economic groups;
- ✓ Distributing servers to different regions, and dividing EBA platform into different educational levels in order to decrease the server load; assigning the task of live courses to provincial directorates in order to avoid the traffic in central administration;
- ✓ Providing free Wi-Fi in specific areas to enable Internet access in rural areas or establishing distance education centers with social distance measures.

1.2 Component on Digital Content for Safety and Quality

- Enhancing the digital literacy of students, teachers and parents for a more effective distance education;
- Enriching and professionalizing the content;
- Merging all contents created by different units of the Ministry under a single platform;
- Creating content for vocational classes;
- Increasing the number of contents for students who need special education;
- Establishing a clear definition and the limits of the content ecosystem;
- Developing content for the professional development of teachers;
- Supporting distance education with extra-curricular activities.

Solutions proposed to the mentioned suggestions are given below:

- ✓ Establishing content development centers; including the content developed by other content developers previously on EBA on the platform and operationalizing the Distance Education Centers;
- ✓ Incorporating parents into distance education system and enabling them to adapt and contribute to the process;
- ✓ Developing simple content that are enriched in a way that they address more senses with lively images for students with special needs.

1.3 Component on Institutional Capacity for Education Resiliency

- Developing an assessment and evaluation system;
- Following the absence status of students;
- Establishing project management committees in provinces;
- Assigning the task of resolution centers to provincial directorates;
- Incorporating IT Teachers into the process.

Solutions proposed to the mentioned suggestions are given below:

- ✓ Designating and assigning staff in provinces and districts for Project Management, Monitoring and Impact Evaluation; granting them access to the data related to the project; and enabling them to access regional statistics so that they could intervene in time;
- ✓ Creating EBA teams for the resolution of problems faced in order to support the central administration.

1.4 Stakeholder Engagement Plan

The highlighted suggestions include clearly defining the authorities, responsibilities, limits, communication hierarchy, tasks of Provincial/District Directorates, School/Institution Administrations; authorizing the responsible staff in provinces/districts for distance education so that they could solve the technical problems (related to MEBBIS, E-School, EBA) in the area.

Another significant suggestion is to incorporate children from separated families; children of martyrs and war veterans; orphans; and homeless children into the disadvantaged children.

In addition, adding the content developed by content developers in the field of parent training is also suggested. An example to the content developer: <https://www.acev.org/>

Creating public service announcements by national press bodies to raise awareness for students, parents and general public is one of the suggestions.

2- FEEDBACK FROM YEGITEK WEBSITE

The project has been disclosed to public to collect the ideas, opinions/suggestions and evaluations of the stakeholders regarding SSDE Project at yegitek.meb.gov.tr. Teachers, students, parents and other stakeholders have had a chance to convey their opinions.

Analyzing the feedback received, the topics mentioned the most have been identified. They are given below:

- Providing equipment;
- Providing free Internet connection for live courses;
- Training teachers, students and parents to increase their digital literacy;
- Including parents into the process;
- Developing a national software for live courses;
- Increasing access to the Internet in rural areas;
- Incorporating an assessment and evaluation section into the system;
- Creating attendance reports for distance education.

In addition to the suggestions given above, other suggestions have been placed such as diversifying the content; increasing the number of especially foreign language content; adding more content on vocational classes; merging all content created by different units of the Ministry under a single platform.

It has also been suggested that content for improving students scientifically and socially should be included.

Teachers have suggested that live courses should be provided for every grade; recorded and shared online and offline.

Another suggestion was to conduct studies to increase the motivation of students.

3. FEEDBACK FROM THE OTHER UNITS OF THE MINISTRY

Directorate of Strategy Development

For the subcomponent 1.1, it has been stated that applications for increasing the opportunities or providing equal opportunities to groups defined as Vulnerable Groups, should be included in Stakeholder Definition and Analysis in Response to School Closure due to COVID-19 or in another suitable section of the document. Moreover, it has been highlighted that the measures targeting children who don't have sufficient means for self-learning at home; have low possibility of connectivity, distance learning and access to devices; other children from families of low socio-economic status; and children with special education needs should be emphasized.

According to another suggestion, indicators under the Stakeholder Involvement Plan and Reporting should be reconstructed based on the components and subcomponents of the Project so that the monitoring and evaluation process can be more effective. If indicators are reconstructed as mentioned, a template will be achieved to monitor the outcomes and the impacts of the project. Therefore, it is important to increase the number of indicators of output and impact in order to determine the effectiveness and success of the project.

General Directorate of Lifelong Learning

It has been suggested that the Project can be reconstructed in a way that it would include the lifelong learning. The proposed studies for the related suggestion are given below:

“It should be taken into consideration that Open Education and Distance Education should be offered as an alternative to students at the age of formal education as well as groups of students who aren't somehow able to continue formal education. In any case, formal education should be sustained in the form of Open Education and Distance Education. Open Education has been provided for many years in Turkey. With the approach of distance education in the current open education system, individuals who can't continue formal education inside and outside Turkey have been reached out. In addition, it should be possible to continue learning when the new blended model is applied to students at the age of formal education (could be for some classes). These approaches should establish a synergic ecosystem for developing and presenting the digital content by the units of the Ministry responsible for the open education. Adult learning should also be included in the cooperation topics.”

Moreover, it has been stated that courses are delivered with blended learning model with the UNDP, and content are developed to be used in life learning institutions with the Distance Education Project. It has been suggested that the Project could benefit from the existing adult learning content of two mentioned projects.

Directorate of Board of Education and Morality

It has been suggested that the Projects shouldn't be limited to the Covid-19 pandemic and it should also focus on the post-Covid-19 pandemic process by taking into consideration the different disasters, diseases and other unexpected situations, as a matter of sustainability.

In order to provide pedagogical support and address the curriculum and educational materials in a blended/hybrid approach during digital content development, the following suggestions have been given:

- Reviewing exemplary country studies;
- Collaborating with related universities, NGOs and mentioned actors;
- Cooperating within the tasks and responsibilities of the related units of the Ministry.

Directorate General of Vocational and Technical Education

Also, it has been suggested that developing interactive modules for improving students' skills with simulations for careers where learning by doing is essential, could be considered in the project. Accordingly, the following suggestions were made:

- Developing virtual reality-based modules for smartphones;
- Developing trainings and/or training modules in order to increase the pedagogical capacity of teachers for distance learning, especially within the scope of live courses.

Directorate General of Special Education and Guidance Services

It has been stated that digital content can be developed by taking into consideration the needs of students of special education, with special abilities and inclusive students. In addition, digital content could contribute to the guidance services.

General Directorate of Basic Education

It has been stated that the type of interest of the parties mentioned in the Stakeholder Engagement Plan should be defined, as well as information about the project work schedule, start, end and duration should be presented. In addition, a detailed action plan describing the operation has presented as a proposal.

General Directorate of Secondary Education

It is stated that additional information can be provided on how to manage the ecosystem for Component-2 and technological equipment application workshops and studios can be added that can be used easily by the relevant general directorates within the MoNE. It is advised as a proposal that MoNE productions should be explicitly included during the ecosystem creation, and the working procedures and policies of the MoNE field experts who will produce here, taking into account the staff at schools. In addition to these, it is stated that the mechanisms for producing, analyzing and approving digital content should be explained and cooperation should be made with the relevant general directorates.

General Directorate of Teacher Training and Development

In addition to the strengthening of the technological infrastructure for the professional development of teachers and the creation of digital contents of the professional development programs to be carried out within the scope of the project, the suggestions of the existing professional development programs are converted into digital content.

General Directorate of Private Education Institutions

In the design and development phase of the project, it is suggested that the students studying in private schools and the teachers working in these schools are included in the system.

4- FEEDBACK FROM NON-GOVERMENTAL ORGANIZATIONS

The opinions and suggestions of Association for Solidary with Asylum Seekers and Migrants (SGDD-ASAM) and UNICEF are given below:

4.1 Association for Solidarity with Asylum Seekers and Migrants (SGDD-ASAM) has stated to be open to all kinds of collaboration and cooperation. Opinions and suggestions are given in a detailed way below:

For Component 1:

1. Since children under temporary protection have limited access to Internet and television, printing materials to complement the online education system and continuing education in coordination with these materials; identifying children with no access to television, smartphones and Internet, etc., and developing a plan to deliver the required devices to them.
2. Collaborating with Internet service providers for internet infrastructure and supporting children under temporary protection with free Internet access (as a social responsibility)
3. In order to enable children under temporary protection to access easily to devices such as tablets for distance education, establishing classrooms/spaces of social distancing in community centers. (Spaces with social distancing measures can be established in SGDD field offices. Classrooms/spaces with Internet connection and computers where social distancing and other necessary measures are taken, to be used during disasters in SGDD centers and other similar community centers. These spaces can be monitored by youth volunteers and similar staff.)
4. Collecting unused computers and tablets from several institutions, organizations, associations, companies (private, public, NGO, etc.) in specific centers and preparing them for use and distance education and distributing them to vulnerable and disadvantaged children. (In this way, useable devices that are not used anymore and stored in many institutions and companies could be utilized again. A national campaign can be started for this activity.)
5. A specific service can be provided in neighborhoods where mostly children under temporary protection reside, with buses, vans and other mobile vehicles that are designed specifically for distance education and with social distancing measures, equipped with internet connection, computer and/or tablets.

For Component 2:

1. Creating e-content with the involvement of teachers in a way that will include the cultures of children under temporary protection;
2. Developing course/topic evaluation materials that students could choose;
3. Creating e-content for topics that will enable social harmony among children under temporary protection for different age groups such as writing essays; and establishing a platform to publish them;
4. Creating video animations for especially 6-10 years old children to help them grasp the invisible notions such as bacteria, germs and viruses and learn and apply the hygiene rules carefully;

5. Establishing virtual classrooms in order to support the improvement of primary school students' psychosocial wellbeing and development; enabling them to interact individually to their teachers and classmates; and therefore, reinforcing their engagement in education;
6. Creating videos especially for 6-10 years old children on the 'secure use of Internet', and introducing them to the system;
7. Creating a note-taking area for children where they could plan their schedules for sleeping, eating, technology use, games and studying;
8. For all students, especially for adolescents, carrying out support interviews with students and guidance teachers on the instruction of form teachers, preventing students under temporary protection who are most likely to drop out, from developing new vulnerabilities, and providing psychosocial support.

For Component 3:

1. Having teachers assess the current system;
2. Training teachers on the capacity building for e-content development.

4.2 UNICEF

For Component 1, it has been highlighted that equal opportunities should be provided for students and teachers that will benefit from the Project. Similarly, the current technological infrastructure and readiness of schools in different regions should be taken into consideration while planning IT infrastructure.

For Component 2, it has been stated that the readiness and digital literacy of teachers, students and parents are important and should be considered carefully in the process. In addition, the content to be developed should take into consideration the individual students' learning speed and method. For this, especially the lingual challenges and disability of children under temporary protection should be considered. Another important aspect to consider while planning content is to follow, monitor and evaluate the progress of targeted children.