REPUBLIC OF TURKEY
MINISTRY OF NATIONAL EDUCATION

SAFE SCHOOLING AND DISTANCE EDUCTION

PROJECT (P173997)

ENVIRONMENTAL AND SOCIAL MANAGEMENT

FRAMEWORK

JANUARY 2021

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1.   Project Description

Introduction and Context

An outbreak of Coronavirus Disease 2019 (COVID-19) caused by the 2019 novel coronavirus (SARS-CoV-2) has been spreading rapidly across the world since December 2019, when the first cases were diagnosed in Wuhan, Hubei Province, China. COVID-19 has been detected (as reported) in 216 countries to date.[1] On March 11, 2020, the World Health Organization (WHO) declared the rapidly spreading Coronavirus outbreak a pandemic, acknowledging what has seemed clear for some time-the virus will likely spread to all corners of the globe. As of June 18, the total number of COVID-19 cases detected was 8,184,867, out of which there have been 443,872 deaths.[2] The first case in Turkey was reported on March 11, 2020. As of June 18, the number of cases reported has reached 184,031, out of which there have been 4,882 deaths.[3]

The Safe Schooling and Distance Education (SSDE) 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. This operation is prepared under procedures for project for urgent need for assistance (para 12 of OP. 10).

In the education sector, as a result of the COVID-19 pandemic, all schools and universities were closed. On March 23, the Ministry of National Education (MoNE) initiated distance-based schooling. MoNE is delivering distance education services during school closures due to COVID-19 through its online Digital Education System, 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. The EBA digital education system requires improvements to meet the needs of 18 million K-12 students and 1 million teachers now requiring additional distance learning services as a result of school closures. Through MEBIM hotline (call center of MoNE), 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 re-open, urgent investments are necessary to ensure MoNE online digital education system 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. It can also promote a shift towards new behaviors and technologies in the education sector that may have lasting influence on reducing carbon emissions. However, the digital education system was not fully completed as expected in terms of access and uptake by teachers, students and parents – which is crucially required now.

Considering online-base schooling is no longer an alternative but a necessity, MoNE seeks to improve and scale up the existing education technology tolls but some obstacles became imminent with the COVID-19 crisis such as limited access, insufficient distance education guidance and instructional methods for teachers, quality assurance mechanisms, and a school-wide approach clarifying the on-line learning support roles across school principals, teachers, parents and students. The MoNE's two-prone strategy is; (i) to expand access to distance education, both on-line and TV, with required materials, teacher training, and parental guidance (both curricular and to mitigate COVID-19 risks), and (ii) to complete earlier investments in the education technology but modernizing EBA through a New Digital Education System (NDES), that is

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[1] https://www.who.int/emergencies/diseases/novel-coronavirus-2019 accessed on June 18, 2020
[2] https://www.who.int/emergencies/diseases/novel-coronavirus-2019 accessed on June 18, 2020
[3] Ministry of Health, Republic of Turkey, https://covid19.saglik.gov.tr/

resilient to climate related natural disasters, and create the organizational and virtual structures for innovative digital education materials for teachers and students.

Turkey also aims to minimize the educational costs of school closures stemming from the COVID-19 outbreak. The "Learning Adjusted Years of Schooling (LAYS)" indicator, within the World Bank's Human Capital Index, shows that although the Turkish school system has been able to provide access to more than 12 years of education to its children and youth, this has only translated to 8.9 years of learning. Although Turkey had begun to improve this access-learning gap according to recent international assessments (e.g., PISA 2018), the COVID-19 crisis threatens to reduce these gains. Without foreseen investments of MoNE to face school closures and re-opening, the access-learning gaps will worsen.

Turkey's education technology investments to-date aimed to improve the quality of education for the 21st century, now they are also required to respond to emergencies such as similar Syrian crisis, earthquake, floods, etc. A national and strong system for distance-based education is crucial for MoNE's readiness to respond during emergencies, both to deliver protection and life-saving information, as well as to continue teaching and learning to minimize learning loss during crises.

The 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 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 was not a systematic approach to provide equipment for students from low-income families during the first days of the pandemic, throughout the process of distance education, local administrations have partially provided the equipment that students require to be able to follow education. On the other hand, MoNE is planning to provide 500.000 tablet computers to the students from low-income families.

Project Development Objective

The Project Development Objective (PDO) is 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.

Project Components

SSDE Project design includes three 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. To draw a balance between emergency response and resilient recovery, the project is designed such that each component has a subcomponent for immediate response activities, and a subcomponent setting the post-COVID-19 foundations for on-going developments in Turkey's e-learning system. The emergency investments cover the period of school closures and gradual re-opening of schools (March 12 to December 31, 2020). Resilient recovery investments cover three school years: 2020-2021, 2021-2022, and 2022-2023.

Even though the scope of the Project is universally targeting teachers and students in the education system, it also includes equity interventions for students most vulnerable to learning loss due to COVID-19 school closures. Activities to support accessibility and risk mitigation are included, and most of its monitoring indicators are disaggregated by gender. Lastly, strengthening Turkey's digital education system can have important environmental and disaster-risk management co-benefits, such as making the platform and its

data resistant to extreme climate, power outings, and even reduction in carbon emissions by limiting paper use and travel.

The project components are as follows:

Component 1: Emergency Connectivity and IT Infrastructure for Education in Emergencies (US$98 Million)

This component finances the expansion of the country's e-learning platform, EBA during COVID-19 response and supports the development and roll out of a NDES. Subcomponent 1.1 addresses the urgent response to ongoing emergency by expanding existing the EBA platform, complemented by TV-based education delivery. Subcomponent 1.2 accelerates the transition to full scale distance learning solutions required for post-COVID-19 recovery through the development of a new system that combines universal access with equity and sustainable IT infrastructure with resilience to future shocks and climate related disruptions.

Subcomponent 1.1: COVID-19 School Closure Response

This subcomponent will finance goods and services to expand the operation of the current online education system (EBA). It will increase simultaneous access to the existing online education system for more than 1 million students – prior to an expansion to 5 million concurrent users through a new system (see subcomponent 1.2). Given the on-going COVID-19 emergency, improvements to EBA have begun and retroactive financing will be requested from the Project. To bridge the digital gap, especially in poor households, access to the EBA's online education platform will be complemented with courses, materials and messages delivered through television and mobile phones. Student participation in distance education modalities will be monitored, including by gender.

This emergency response subcomponent will finance immediate enhancements of the existing EBA learning system and related digital infrastructure. While the initial design of EBA system projected its usage at 40,000 simultaneous users, MoNE has already extended the platform to accommodate up to 1.000,000 users and intends to increase this number. Expansion of the EBA platform benefits the overall education system; however, equity issues are considered including facilitating access in Provinces with lower socio-economic indicators, financing awareness and outreach campaigns, and combining different delivery forms of distance education, including Television and mobile phones. The subcomponent will provide EBA software updates and integration, servers' scalability, on-going data storage and backing and software maintenance. The proposed activities will be undertaken during the COVID-19 school closure period and financed through a retroactive financing arrangement. Combined with subcomponent 2.1 (Digital Content and Pedagogical Support During School Closures and for School Re-opening), these investments contribute to minimizing loss of learning due to COVID-19 related periods of school closure.

Subcomponent 1.2: Resilient Digital Education System

This subcomponent will finance feasibility studies, consultancies, goods, services and small refurbishments to set the IT infrastructure for the NDES and increased capacity from 1 million concurrent students to 5 million; and from 50,000 to 100,000 simultaneous virtual classrooms. The aim is to support blended learning (classroom-online) in schools post-COVID 19 and to support the education response in future emergencies. Given that the current system architecture is not designed to serve that number of simultaneous users, the project will finance a new higher capacity system and related horizontal IT infrastructure expansion. It will enhance data center capacity or completely migrate to cloud platform on an Infrastructure as a Service (IaaS) and/or Platform as a Service (PaaS) model. Besides, it will enhance new system's software architecture, testing and quality assurance, cybersecurity, learning analytics system, and new content delivery network (CDN) architecture. To support the resilience of the digital education system in the face of future

shocks, service outage and data loss will be minimized (for example through a cloud-based backup data center) and recovery approaches will be included within MoNE's disaster response plan in case of an extreme climate event or any other emergency. The subcomponent will finance procurement of necessary hardware/service for the data centers, consultancies, feasibility studies, and technical know-how.

The design and the launching of the NDES will include three phases. During the first phase, this subcomponent will finance the needs assessment, feasibility studies, design and preparation of tender documents of the NDES, including (i) approaches to integrate the digital education system with K-12 delivery modalities, including those most accessible to special needs and low-income groups (TV, mobile, etc.), and (ii) a backup data center arrangement and a disaster recovery plan that lays out the procedures to restore the system and quickly recover crucial data in case of an extreme climate event. During the second phase, the subcomponent will finance the modular development of the new digital educational system. During the third phase, the new system will be rolled out. The roll-out of the new system will pay attention to issues of digital content archive, scalability, data integration and operability, disaster recovery procedures, and usefulness for monitoring and evaluation.

Lastly, activities financed under this subcomponent aim at making the NDES more climate resilient and energy efficient. [4] Beyond analyzing operational and financial models, impacts and sustainability, the feasibility studies also will analyze environmental and social impacts and sustainability, including resilience to climate change and energy efficiency achievable for the new system and related IT infrastructure. Results of the feasibility analysis will inform the overall solution for the NDES which will be financed. Notably substantial positive externalities are expected from the adoption of technologies such as cloud computing because of energy savings – the improvement of energy consumption and efficiency can lead to a substantial reduction of carbon emissions.[5] For instance, based on the current research quantitative assessment of environmental impacts allow for reduction of carbon emission by 30% for large companies and up to 90% for the smallest and less efficient businesses.[6]

Component 2: Digital Content and Pedagogy for Safety and Quality (US$ 54.9 Million)

This component will finance goods, services, consultants, training and small refurbishments to support the distance education content, both during the period of school closures due to COVID-19 and for a gradual return to classroom-based teaching. As post-COVID-19 teaching and learning are expected to require a more "blended" (on-line and face-to-face) approach, the project will finance the development of an "education technology ecosystem" to promote innovative technologies and pedagogical tools by incentivizing partnerships with parents, teachers, students, community actors, universities and other developers of digital content. A "blended approach" can have other co-benefits, such as contributing to reduce carbon emissions due to less paper use and travel.

Subcomponent 2.1 Digital Content and Pedagogical Support During School Closures and for School Re-opening

During school closures and gradual re-opening, this subcomponent will finance consultancies, goods and services for the adaptation and development of digital content for K-12 curriculum delivery, pedagogical practices, COVID-19 risk mitigation, and teacher training. These will be delivered on-line and through TV channels and will include support for catch-up courses and

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[4] Especially comparing to current EBA solution

[5] Cloud Computing and the Sustainability: The Environmental Benefit of moving to the cloud (2010), Accenture, WSP and Microsoft; R.H. Katz, (2009), Tech titans building boom, IEEE Spectrum (February), at http://www.spectrum.ieee.org/feb09/7327 accessed 23 February 2009.

[6] Cloud computing and the Sustainability: The Environmental Benefit of moving to the cloud (2010), Accenture, WSP and Microsoft and http://www.scientificamerican.com/article/cloud-computing-saves-energy/

blended teaching and learning programs. Contents for psycho-social & mental health counseling/guidance, risk mitigation and social distancing measures will also be delivered online, TV and phone applications. It will target parents, teachers and students.

To minimize learning loss due to COVID-19 related school closures, especially for low-income and vulnerable students, this subcomponent will support TV-based educational materials and delivery. TV programming is especially targeted for poor households without digital devices or internet access. Approximately 2,000 new TV videos will be adapted based on content already developed for the education digital platform, EBA. For students with hearing impairment, all contents will be prepared with sign language and subtitle support. For students with visual impairment, all contents will include audio descriptions. Lastly, on-line and TV based materials and courses (through www.eba.gov.tr website and TRT EBA TV) will support the development of catch-up programs and school counseling to support school re-engagement.

The subcomponent will support MoNE's school opening plan and will finance outreach and school re-engagement outreach in low-income and vulnerable areas, with targeted messages for girls, as well as for boys. Building on EBA's already available materials (e.g., videos, applications, digital and audio-visual materials), additional content will be adapted and developed to support re-opening of schools, including for teacher training. These will be aligned to curricular needs for primary, lower secondary and upper secondary education that meet the particular needs of each level of education.

Subcomponent 2.2: Educational Innovation and Participatory Ecosystem

This subcomponent will finance feasibility and design studies, consultancies, goods, services and small refurbishments to establish a sound collaboration and communication "ecosystem" for the on-going development of digital education technologies. This will include feasibility and design studies for the "EdTech Innovation Hub" and its operationalization to promote development of digital materials for teachers and students.

Materials for teachers will include a variety of multimedia, CPD materials, instructional materials, pedagogical tools. Materials for students will target educational level K-12. Digital and distance education strategies and tools for education emergency response will be developed as well. The NDES (see component 1.2) and the development of innovative digital education materials will also benefit the education needs of different groups of students, given their interest, background, gender and other characteristics requiring personalized learning approaches. Also, the NDES will include modules for extracurricular programs and awareness messages targeted to specific groups.

The ecosystem will promote innovation and services for schools and will bring together education technology stakeholders and users. The organizational structure for the "education technology ecosystem" will consist of the "EdTech Innovation Hub" that will coordinate the research and development process for education technology innovations, as well as the strategy to involve teachers and schools to identify, test and evaluate innovations. Teachers' involvement will be organized as a unit and function of the EdTech Innovation Hub, called the "Professional Learning Lab."

The **EdTech Innovation Hub** will guide the development and testing of educational digital materials and technologies through targeted research and development (R&D). The **R&D Program** would promote start-ups and entrepreneurial ventures in EdTech through public private partnerships targeting companies, industry partners, universities, and individuals to test and develop products, software, and hardware to connect schools, teachers, and students to digital learning. Targeted R&D services will be procured to develop approaches to tackle innovative solutions to educational technological challenges (e.g., digitalization, artificial intelligence, sustainable development goals, supporting learners with disabilities/special needs, upskilling

teachers, catch-up programs for students with low academic background, innovative functionalities for the EBA platform). All activities to develop new digital education materials and tools (in-house or contracted) will involve innovative teachers as collaborators and will commit to evaluate the impact of innovations at the school level. Model testing of new education technology innovations at the school level will include feedback from teachers and students, through a "funnel" evaluation model to be included in the NDES.

The **Professional Learning Lab (PLL)** will support pedagogical and organizational improvements at the school level, including training of trainers and contributions to teachers' professional development. School actors will contribute to the innovation process, and teachers and students will participate in the evaluation of new teaching and learning materials. The PLL strategies will support and promote school level innovations and knowledge exchange across teachers. The prototype of flexible learning environments within PLL will provide opportunities for development of teacher trainings and knowledge exchange in specific areas of interest. Once the education technology ecosystem is operational – including the EdTech Innovation Hub and PPL approach – the subcomponent will finance its initial roll-out.

Component 3: Institutional Capacity for Education Technology Resilience (US$7.1 million)

This component will strengthen MoNE's organization and capacity 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 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 strategic approaches and education in emergencies (EiE) models to face future crises.

Subcomponent 3.1 Project Management, Monitoring and Impact Evaluation

This subcomponent will finance consultancies, goods, services small refurbishments and operating costs to support the planning, executing, monitoring, controlling and impact evaluation for each component of the project to deliver safe and distance education. An annual work plan and budget will be prepared for implementation. The monitoring, controlling, research activities and impact evaluation will be financed by this subcomponent. To support data collection and monitoring of EBA users by gender and other socio-economic characteristics, this subcomponent will support the integration and interoperability of EBA with MEBBIS and E-School (i.e., MoNE's education management information systems).

Subcomponent 3.2 Institutional Capacity-Building for Education Preparedness in Emergencies and E-Learning Resilience

This subcomponent will finance technical assistance, studies and knowledge events to consolidate the preparedness and response capacity of MoNE to face any future crises, including through e-learning technologies. It will support the design and implementation of a robust disaster risk management and disaster recovery plan in the education sector, which will include strategies for the sustainability of the new digital education platform in the face of climate, environmental or other crises. Turkey is vulnerable to different types of natural and human-made disasters; this year alone, the education system provided distance education services to students after the 6.7 magnitude earthquake in Elazig province; continues to integrate displaced Syrians into the Turkish education system, and now has had to respond to the COVID-19 pandemic.

Implementing Agency

The project will be implement by MoNE through a Project Implementation Unit (PIU) within the Directorate General for Innovation and Educational Technologies (DGIET). DGIET will serve as the

Executing Agency (EA) and will have overall responsibility for implementation, coordination, and oversight for SSDE implementation. DGIET will manage the project but will require support from other Directorate Generals (DGs), especially in the curricular, pedagogical and teacher development issues, as well as from DGs and programs providing specialized support (school counseling, education for migrants and in emergencies, etc.). The DGIET and PIU will coordinate closely with other DGs of MoNE, as well as with external partners – national and international.

PIU will be supported by technical specialists of the MoNE and technical consultants. Delivery will be coordinated with the support of, Provincial Level Education Directorates (PLEDs), and the District Level Education Directorates (DLEDs). At the local and school levels, the main frontline actors are the public schools, where school management (SM) is responsible for all school-level active involvement on distance education. SM will be provided with EBA platform for planning and monitoring the distance education activities and to collect teachers, parents and students feedback.

The SSDE project will benefit from MoNE's 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.

Purpose of Environmental and Social Management Framework

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 techno-parks in Ankara, and Professional Learning Lab (PLL) within EdTech Innovation Hub building. The specific locations of the relevant centers/hub/PLL to be benefitting from the Project are not identified at this stage and will be known during implementation. The environmental 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, and PLL and implementation of R&D Program. There are also risks related to the management of electronic wastes to be generated at data centers and the EdTech Hub, and the requirement to introduce energy efficiency for the equipment to be purchased.

Therefore, this Environmental and Social Management Framework (ESMF) has been prepared (to address the above aspects), which sets out the principles, rules, guidelines and procedures to assess the potential environmental and social risks and impacts in accordance with national legislation and the Environmental and Social Standards (ESSs) of the World Bank's ESF. Specifically, the ESMF:

- contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts;
- establishes procedures for the E&S screening, review, approval, and implementation of activities;
- specifies institutional arrangements, responsibilities and capacity building needed to successfully implement the provisions of the ESMF;
- addresses mechanisms for public consultation and disclosure of project documents as well as summarizes the stakeholder engagement and grievance redress mechanism which are detailed in a standalone Stakeholder Engagement Plan; and
- integrates the Labor Management Procedures (LMP) to address labor risks associated with the project.

The ESMF will also guide PIU on the environmental and social (E&S) screening and subsequent assessment during implementation, including specific plans in accordance with the World Bank safeguards policies.

2. Policy, Regulatory and Institutional Framework for Environmental and Social Assessment

Institutional Framework for Environmental Protection and Conservation in Turkey

Turkish environmental regulations were developed in line with national and international initiatives and standards, and some of them have recently been revised to be harmonized with the EU Directives in the scope of Turkey's pre-accession efforts. The Ministry of Environment and Urbanization (MoEU) is the responsible organization for the implementation of policies adopted for protection and conservation of the environment, and for sustainable development and management of natural resources.

The MoEU (central organization) is based in Ankara and it has provincial directorates in each province. The MoEU has an overall coordinating role for the development and implementation of environmental policies in Turkey, including the approximation process for the EU environmental Acquis. The central organization is composed of GDs and directorates such as GD of Environmental Impact Assessment, Permit and Inspection, GD of Natural Assets Conservation, GD of Environmental Management, GD of EU and Foreign Relations, Directorate of High Technics Boards, etc.

Main environmental responsibilities of the MoEU are summarized below:

- Prepare the legislation on environment, public works, and housing development and monitor and audit the related implementations;
- Identify the principles and policies on environmental protection, rehabilitation of environment and prevention of environmental pollution, develop standards, criteria and programs in this context; outline the principles for implementing and monitoring these standards and criteria; undertake the works related to climate change;
- Assess the impacts of all facilities/activities that pollute the environment due to their activities resulting in solid, liquid or gaseous waste disposal/discharge into receiving environments; monitor, audit and issue the permits of such facilities/activities;
- Perform the measurements/analyses and monitoring studies concerning receiving environments;
- Establish the plans and policies regarding the global climate change and measures to be taken against its effects.

For the management of environmental issues, MoEU collaborates with other ministries (including their provincial organizations where relevant), government agencies and relevant stakeholders, such as; Ministry of Transport and Infrastructure (GD of Highways, GD of Infrastructure Investments), Ministry of Agriculture and Forestry (GD of Nature Protection and National Parks, GD of Water Management, General Directorate of State Hydraulic Works, GD of Forestry, GD of Meteorological Services, GD of Agricultural Reform), Ministry of Culture and Tourism (GD of Cultural Heritage and Museums), Ministry of Energy and Natural Resources (GD of Mining and Petroleum Affairs, GD of Mineral Research and Exploration), Ministry of Family, Labor and Social Services (GD of Occupational Health and Safety, GD of Labor) and Ministry of Health (GD of Health Services, GD of Public Health).

National Regulatory Framework for Environmental and Social Assessment

Constitution of the Republic of Turkey: It is stated in Article 56 of the Constitution that "Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution. To ensure that everyone leads their lives in conditions of physical and mental health and to secure cooperation in terms of human and material resources through economy and increased productivity, the state shall regulate central planning and functioning of the health services. The state shall fulfill this task by utilizing and supervising the health and social assistance institutions, in both public and private sectors. In order to establish widespread health services, general health insurance may be introduced by law".

National Environmental Legislation: Turkish environmental regulations were developed in line with national and international initiatives and standards, and some of them have been revised recently to be harmonized with the EU Directives in the scope of pre-accession efforts of Turkey. The Ministry of Environment and Urbanization (MoEU) is the responsible organization for the implementation of policies adopted for protection and conservation of the environment, and for sustainable development and management of natural resources.

The Turkish Environmental Law (Law No: 2872; Date of Ratification: 1983), which came into force in 1983, addresses environmental issues on a very broad scope. According to the basic principles that govern the application of the Environmental Law, and as stated in the Constitution, citizens as well as the state bear responsibility for the protection of environment. Complementary to the Environmental Law and its regulations, other laws also govern the protection and conservation of the environment, resources and cultural and natural assets, the prevention and control of pollution, the implementation of measures for the prevention of pollution, health, and safety and labor issues (see Annex II).

The Turkish Regulation on Environmental Impact Assessment (EIA): The Regulation on EIA was put into force for the first time after being published in the Official Gazette numbered 21489 and dated on February 7, 1993. Since then there had been several amendments in the first regulation and new EIA regulations were published in 2008 and 2013 repealing the former regulations in force. The latest EIA Regulation has been published in the Official Gazette dated November 25, 2014 and numbered 29186, which repealed the 2013 EIA Regulation. The EIA Regulation is largely in line with the EU Directive on EIA. The key relevant steps of the Turkish EIA procedure are screening, public consultation, scoping, disclosure and supervision. The EIA Regulation classifies projects into two categories: (i) Annex I projects; those are projects that have significant potential impacts and require an EIA, and (ii) Annex II projects; those are projects that may or may not have significant effects on the environment.

For projects that require the preparation of an EIA, the Governorate is required to inform the public that a project application has been submitted in a specified locality, that the EIA process has begun and that the public may submit its comments and suggestions to the Governorate or MoEU. A formal public consultation meeting occurs for projects that are subject to an EIA after the screening process and prior to scoping. The project proponent organizes a "public participation meeting" chaired by MoEU provincial director in a location that affected local groups can access easily. The EIA Regulation does not require public consultation meeting for Annex-II projects.

Regulation of Waste Management: The purpose of the Waste Management Regulation is to ensure management without harming the environment and human health from the formation of waste to the disposal, to reduce waste generation, to reuse waste, to recycle, to reduce the use of natural resources and to provide waste management and to determine the general procedures and principles having certain criteria in terms of environment and human health regarding the production of the products covered by this Regulation and the market surveillance and control with basic conditions and features.

Regulation on the Control of Waste from Electrical and Electronic Equipment (WEEE): The purpose of the Regulation on the Control of WEEE is to regulate the technical and legal principles regarding; (i) restriction of the use of certain hazardous substances in electrical and electronic equipment, (ii) identification of exemptions from such restrictions, (iii) control of import of electrical and electronic equipment, and (iv) reuse, recycling, and recovery method and targets for the reduction in the amount of such waste to be disposed of and minimization of generation of WEEE. This regulation has been prepared based on the relevant articles of Environmental Law (Law No: 2872), and in parallel with the Directive 2002/95/EC of the European Parliament and of the Council on the Restriction of the Use of Certain Hazardous Substances in Electrical and

Electronic Equipment and Directive 2002/96/EC of the European Parliament and of the Council on WEEE.

Regulation on the Control of Medical Wastes: The purpose of the Regulation on the Control of Medical Wastes is to prevent direct or indirect delivery to the receiving environment in a way that harms the environment and human health, to be collected separately at its source without harming the environment and human health, to be transported within the health institution, to its temporary storage, to its medical waste processing facility and its disposal, to regulate the principles, policies and programs as well as the procedures and principles regarding the determination and implementation of legal, administrative and technical principles. The medical wastes in Turkey are managed through sterilization and incineration facilities with sufficient capacity.

Circular 2020/12 of MoEU on COVID-19 Measures in the Management of Personal Hygiene Equipment (such as Single use Masks, Gloves) Wastes: This circular was published on April 07, 2020 and defines the minimum requirements to be considered in the accumulation, collection, transportation, temporary storage and delivery to waste processing facilities of personal hygiene equipment wastes. Also, the **waste management guidance of the MoH** mentions that; (i) Wastes of a patient possibly or definitely diagnosed COVID-19 are recognized as infectious waste in hospital environment and disposed to medical waste box", (ii) Wastes of a patient possibly or definitely diagnosed COVID-19 who is monitored at home should be collected separately through the protective preventions required, kept in double bags and disposed to domestic waste box, (iii) The wastes of the contacted individuals (contacted with the patients who have possibly or definitely COVID-19, individuals coming from a country or province where the disease is common) who are observed in collective accommodation places (i.e. dormitory) for 14 days should be disposed to domestic waste bag, (iv) Disposable masks and gloves used for protection in the society should be disposed to domestic waste bag, (v) There is not any information about disposal of the wastes of COVID-19 patients following a certain waiting period in the guidelines of important healthcare organizations including WHO, CDC and ECDC.

National Pandemic Plan: The National Pandemic Plan was published in 2006 as a part of the preparation for influenza pandemic in Turkey. The plan was molded into its final form as "The Pandemic Influenza National Preparedness Plan" after being updated in the light of experiences gained during the 2009 Influenza A pandemic along with the regulations and recommendations made by WHO during the process. The Pandemic Influenza National Preparedness Plan was prepared under the coordination of the Ministry of Health, General Directorate of Public Health in collaboration with other institutions and organizations. The Plan was published in the Official Gazette as the Presidency Circular 2019/5. The Pandemic Influenza National Preparedness Plan has been prepared to provide an outline of the minimum elements needed to be prepared, as well as to ensure optimal readiness. The plan aims to secure the continuity of public services and to reduce the transmission of the pandemic strain, number of patients related to the pandemic, hospitalization and deaths due to the disease, and the socioeconomic burden formed by the pandemic. Provinces were requested to generate "Provincial Pandemic Influenza Preparedness and Action Plans" in line with the Pandemic Influenza National Preparedness Plan. In compliance with this request, 81 Provincial Health Directorates prepared drafts of "Provincial Pandemic Influenza Preparedness and Action Plans". The committee evaluated these plans, and provinces were asked to complete their preparations in accordance with the feedbacks given on a provincial basis. Even though the Pandemic Influenza National Preparedness Plan has been prepared for Pandemic Influenza, this plan is adaptable to the New Corona Virus Disease (COVID-19) caused by a virus that transmits via respiratory droplets, similar to Influenza. [7]

COVID-19 Risk Assessment and COVID-19 Guideline: Scientific Board for COVID-19 conducted the "COVID-19 Risk Assessment" on January 22, 2020. In addition, "COVID-19 Guideline and Case Report

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[7] Turkish Journal of Medical Sciences, COVID-19 Outbreak Control, Example of Ministry of Health of Turkey, Demirbilek et al., accepted/published online: 18.04.2020

Form" was prepared in the same meeting. The "COVID-19 Disease Guideline" includes general information about the infection, case definitions and information on case management, infection control and isolation, patient care and treatment. The guideline also included information for the people who will be travelling to the countries with COVID-19 cases. This guidance has provided a standardized approach all over the country towards suspected cases. The first version of the guideline was published on January 24, 2020. Following the scientific developments and WHO guidance/recommendations, it is constantly updated and published on the website of the Ministry of Health together with COVID-19 posters, leaflets, frequently asked questions and algorithms.[8] Last update of the guideline has been made on June 01, 2020 as of June 18, 2020. Turkey's COVID-19 Responsiveness Plans are in line with the WHO strategic action plan for pandemic influenza (WHO, 2007). **Guidance to COVID-19 Outbreak Management and Working** has also been prepared by Scientific Advisory Board and it provides measures to be taken at workplaces such as shopping malls, worksites, etc. Last update of the guideline has been made on June 17, 2020 as of June 18, 2020.

National Laws on relevant on Social Impacts: Although the Turkish EIA Regulation needs to be strengthened to meet the requirements of international standards in terms of social impacts, there are various legal arrangements for managing several social impacts. The following are laws and regulations applicable to this project:

- Labor Law (No. 4857), published in the Official Gazette no. 25134 dated 10 June 2003
- Law on Occupational Health and Safety (No. 6331), published in the Official Gazette no. 28339 dated 30 June 2012
- Regulation on Contractors and Sub-contractors, published in the Official Gazette no. 27010 dated 27 September 2008
- Law on Right to Information (No. 4982), published in the Official Gazette no. 25269, dated 24 October 2003

Occupational Health and Safety: In recent years, Turkey has undergone a reform to improve its national Occupational Health and Safety (OHS) system through adapting a set of international and regional standards into its national level requirements for the prevention occupational risks defined in the ILO Occupational Safety and Health Convention, 1981 (No. 155). The convention, along with the Occupational Health Services Convention, 1985 (No. 161) were both ratified by Turkey in 2005 who is also party to the Labor Inspection Convention, 1945 (No. 81) since 1951. In 2014, Turkey ratified the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

During 2012, a stand-alone Law on OHS (No. 6331) was put into force (20 June 2012). The OHS Law governs workplace environments and industries (both public and private) as well as virtually all classes of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries. Labor Inspectorate, which is a part of the Ministry of Labor, Family and Social Services, enforces labor and OHS laws, and conducts regular OHS and labor audits.

Labor and Working Conditions: Turkey is party to a multitude of ILO conventions, including but not limited to conventions on equal treatment of employees, gender equality, child labor, forced labor, OHS, right of association and minimum wage. Accordingly, the current Turkish Labor Law (No.4857) is to a great extent consistent with international labor standards and the Bank's ESS2 requirements.

The Labor Act of 2003 covers all work relations in Turkey, with the exception of sea and air transport activities, enterprises carrying out agricultural and forestry work who employ less than 50 employees, family-run construction work related to agriculture, works and handicrafts performed in the home,

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[8] Turkish Journal of Medical Sciences, COVID-19 Outbreak Control, Example of Ministry of Health of Turkey, Demirbilek et al., accepted/published online: 18.04.2020

domestic work, sportsmen, people in rehabilitation, enterprises with three or less employees working as tradesmen or producing small handicraft.

Regulation on the Principles and Procedures for the Employment of Children and Young Persons 2004 (RPEC) contains the requirements for employing children under 18 and the types of works prohibited for children to perform. Covers all children under 18 that are also covered by the Labor Act (Art. 2). This excludes children working in activities outside of the Labor Act's scope.

Regulations on Overtime and Extra Hours 2004 (REOH) - applies to all workers and works covered by the Labor Act (Art. 1).

Regulations on Working Conditions at Night for Women Workers 2013 (RWCNW) - applies to all women older than 18 and working in nightshifts and spells out specific requirements and restrictions regarding night work by female workers (Art. 1, 2).

Law on the Work Permit for Foreigners 2003 (LWPF) - Applies to foreigners working in Turkey and regulates the attribution of work permits (Art. 1, 2). Foreign workers must obtain a work permit to be legally employed (L WPF 4). The Labor Act only applies to legally employed foreigners. Employers have to notify the Ministry of Labor and Social Security of any foreigners they employ within 15 days of the beginning of employment (LWPF 18). Employers failing to declare foreign workers have to pay a fine. Where foreigners work without a valid work permit, both worker and employer may be fined (LWPF 21).

International Agreements and Convention

Turkey is a signatory to a number of International Agreements and Conventions including Stockholm Convention on Persistent Organic Pollutants and Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal. Other relevant environmental, OHS and international labor agreements and conventions ratified by Turkey are given in Annex II.

World Health Organization (WHO) Guidance

The WHO is maintaining a website specific to the COVID-19 pandemic with up-to-date country and technical guidance. As the situation remains fluid it is critical that those managing both the national response as well as specific healthcare facilities and programs keep abreast of guidance provided by the WHO and other international best practice. WHO resources include technical guidance on: (i) laboratory biosafety, (ii) infection prevention and control, (iii) rights, roles and responsibilities of health workers, including key considerations for occupational safety and health, (iv) water, sanitation, hygiene and waste management, (v) quarantine of individuals, (vi) rational use of PPE, (vii) oxygen sources and distribution for COVID-19 treatment centers. Additional guidance is listed in Annex III.

3.   The World Bank's Environmental and Social Standards

The World Bank's Environmental and Social Standards (ESSs) set the requirements to be met by Borrowers with respect to the identification and evaluation of social and environmental risks and impacts associated with projects supported by the WB through Investment Project Financing. The ten ESSs establish the standards that the Borrower and the project will meet through the project life cycle.

Based on the planned scope of the present project, the WB's ESSs relevant to the project are as follows:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2: Labor and Working Conditions;
- ESS3: Resource Efficiency and Pollution Prevention and Management;
- ESS4: Community Health and Safety;
- ESS10: Stakeholder Engagement and Information Disclosure.

In accordance with the ESSs, the Project will also apply the relevant requirements of the World Bank Group's Environment, Health and Safety (EHS) Guidelines. When the Turkish requirements differ from the levels and measures presented in the EHS Guidelines, the more stringent one (such as the most stringent discharge and emission standards) will be applied in the project specifications. The applicable EHS Guideline for this project is World Bank Group's EHS General Guidelines.

ESS1: Assessment and Management of Environmental and Social Risks and Impacts

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 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 including a PLL 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 and PLL. 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, under the Component 2.2, the project will also develop an R&D Program for digital education programs, materials and other pedagogical tools to be developed with the involvement of start-ups, companies, industry partners and universities to test and develop products, software, and hardware for educational uses within the network of innovation. The program is expected to be utilized mostly for purchasing goods (equipment) and procuring consultancy services. Details of the R&D Program 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 as part of Component 2. The ToR for the feasibility study will incorporate the tasks for addressing environmental and social aspects of the activities to be supported by the R&D Program.

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 subcomponent 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 tablets), 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 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 and visual impaired and removing the obstacles of communication between teachers and students during the process of distance learning by providing interactive infrastructure in accordance with the personal differences and learning styles of individuals who need special education

(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 subcomponent 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 are addressed through the ESMF prepared by MoNE. The ESMF describes the procedures and responsibilities for carrying out the environmental and social due diligence of the activities to be supported by the R&D program under the feasibility study. Moreover, the list of ineligible activities is also defined in the ESMF (i.e. no land or asset purchasing, no financing for activities that may lead to involuntary resettlement or major civil works, no handling of significant volumes of hazardous chemicals). Further, the ESMF defines 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 also identifies procedures and institutional responsibilities for the identification of site-specific environmental and social impacts and development of adequate mitigation measures, for the minor non-structural refurbishment envisaged at the data center to be rented minor refurbishment works at the building to be rented for the EdTech Innovation Hub Center, including PLL. 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 set up

under the ESMF. For the operation of the data center and EdTech Innovation Hub Center together with PLL, the ESMF provides references to WB EHSGs, GIIPs and acceptable OHS practices envisaged under the national regulations.

The ESMF has been disclosed both in country on the MoNE website URL and on the World Bank website on October 19, 2020 and will be consulted upon. Under the COVID-19 pandemic crisis, different engagement methods are proposed to cover different needs of the stakeholders as defined in the draft Stakeholder Engagement Plan (SEP). Since direct face-to-face consultation and interaction have to be avoided in favor of digital interaction, electronic media and print, virtual consultations will be carried out and incorporated into the final ESMF together with the final SEP.

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. The feasibility studies under component 2 will identify the details and consider environmental and social aspects of the activities to be supported under the R&D program. In this respect, ToRs for the feasibility studies under Component 1.2. and 2 will reflect E&S aspects of the options, such as electronic waste management and energy consumption.

Finally, MoNE has drafted and disclosed a SEP which sets out its community engagement throughout project implementation and a process for project level grievance mechanism.

ESS2: Labor and Working Conditions

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 and PLL. 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 are 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 ESS2. 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 ESS2. 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 are 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

In view of the nature of the project activities, no considerable environmental implications are envisaged in relation to minor non-structural refurbishments in the data centers and minor refurbishment in the EdTech Innovation Hub center and PLL. These would be limited to dust, noise, minor construction wastes and exposure of the workers. The anticipated environmental risks are considered within the scope of the ESMF and will be 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, implementation of the R&D program 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 are assessed within the scope of the ESMF in line with WB EHSGs and GIIP. The ToRs for the feasibility studies to be implemented under Components 1.2 and 2 will also address environmental risks and impacts such as electronic wastes and energy efficiency.

ESS4: Community Health and Safety

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.

ESS10: Stakeholder Engagement and Information Disclosure

SEP has been drafted by MoNE 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. hearing and visual impaired children;
- Children from family environment less able to support home-based education (e.g. crowded households in congested housing).

SEP acknowledges the challenges of broad consultations and continuous engagement across all stakeholder groups under the social distancing constraints imposed by the COVID-19 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 COVID-19 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 broadcasting 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 has been virtually consulted and updated. 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.

4.   Environmental and Social Baseline

The project will be implemented country–wide in Turkey. The project will support 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 together with Professional Learning Lab (PLL) which will be located in one of the techno-parks in Ankara. Therefore, project locations cover (i) across the country, and (ii) the capital city of the country, Ankara, at this stage. The specific locations of the relevant centers/hub/PLL to be benefitting from the Project are not identified at this stage but will be known during implementation.

Turkey is geographically located between Asia and Europe, a cross-road of the Balkans, Caucasus, Middle East, and eastern Mediterranean with a population of 83 million and 783, 356 km^2 area. Located in Eurasia, the country is between the Black, Mediterranean, Marmara and Aegean Seas, bordering with Bulgaria,

Greece, Syria, Iraq, Iran, Armenia and Georgia. 75 percent of its population lives in urban areas and they are all divided into 81 provinces across the country.

Turkey is an upper-middle income country, with the world's 19th largest economy with a Gross Domestic Production that reached US$753.7 billion in 2019 according to the TurkStat.

Turkey is vulnerable to many natural hazards, including earthquakes, landslides, and floods. The 7.1 magnitude Marmara Earthquake in 1999 resulted in over 18,000 deaths and estimated losses of over $28 billion. Turkey is also particularly vulnerable to the impacts of climate change, which have already manifested in an increase in annual mean temperature, changes in the precipitation regime, and increasing numbers of climate-related hazards such as floods and droughts (e.g. catastrophic floods in 2019 and 2020).

After 2011 with the refugee crisis outbreak in Syria, Turkey has become both a transit and target country for migrants and refugees. Today, the country hosts the highest number of refugees, more than 3.6 million Syrians under temporary protection, and an estimated 400,000 asylum seekers and refugees from other nationalities. Prior to the COVID-19 outbreak, nearly four million refugees and asylum-seekers were receiving health services largely through donor-financed health facilities. There are approximately 64,000 refugees who are accommodated in temporary accommodation centers (refugee camps), who require special assistance (disability, elderly care).[9]

Turkey's education technology investments to-date aimed to improve the quality of education for the 21st century, now they are also required to respond to emergencies. Just in 2020, Turkey has been responding to the Syrian crisis, a 6.8 magnitude earthquake (Elazig province), and now the COVID-19 pandemic. Syrian students in the border provinces have received education through EBA at times when security concerns interrupted face-to-face schooling. After the Elazig earthquake, schools were closed and distance education was provided as well through EBA.

In the education sector, as a result of the COVID-19 pandemic, all schools and universities have been closed since March 12, 2020 (start of Spring Break); on March 23, MoNE initiated distance-based schooling through EBA whereas MoNE announced that art, sports and science activities started to be broadcasted in EBA on-line and TV channels on March 30. The public-school system is obliged to use EBA, while it is optional for private schools. The EBA includes more than 1,600 courses and 20,000 items of content (video, audio, documents, infographics, interactive content, etc.) for learning from preschool to 12th grade, including supportive materials for teachers, tests and exams. The e-portfolio module tracks students' academic progress, coursework, social responsibility projects, certificates of accomplishments, teachers' remarks, and progress cards. Teachers can provide customized online interactive learning environment by creating their virtual classrooms on EBA and uploading additional educational materials. For 11th and 12th grade students, a personalized learning environment can be established that covers learning goals, university entrance exams, etc. EBA also offers some modules for students to socialize through games and other team activities. To facilitate more extensive access to education, television is also being used through TRT- EBA TV channels.

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)[10] 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.

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[9] Appraisal Environmental and Social Review Summary, Appraisal Stage (ESRS Appraisal Stage), April 16, 2020, No: ESRSA00722 and Migration data retrieved from goc.gov.tr on April 2, 2020.
[10] World Bank team calculation using PISA 2018 results.

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 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.

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 low-income families.

The Education Vision 2023 of the Government of Turkey provides the overall strategies for education equity, learning and access, including for vulnerable groups and in emergencies. The Education Vision 2023 strategies for digital education, special education, school counseling, school development, and teachers' professional development are also operationalized in MoNE's 2019-2023 action plan.

Turkey has demonstrated significant progress in improving health outcomes and reducing infant and maternal mortality. For example, between 1980 and 2017, life expectancy at birth increased from 58.7 to 77.1 (an increase of 31.3 percent), a better performance than the global average (72.4 for 2017) and almost equal to the Europe and Central Asia (ECA) region performance (77.7 for 2017). Both the maternal mortality and infant mortality rates have also improved, with maternal mortality declining from 42 per 100,000 live births in 2000 to 17 in 2017, and infant mortality falling from 30.9 per 1000 live births in 2000 to 9.7 in 2017.

Improved health outcomes are resulting in demographic shifts, as Turkey's elderly population grows. As of 2019 (most recent data), 10.2 percent of the older population was aged 65 years and over, about 22.6 percent was younger than 15 years, and 67.3 percent was between 15 and 64 years. The proportion over 65 years is expected to rise to 16.3 percent in 2040 and 25.6 percent in 2080, according to population projections.

Turkey's burden of disease is increasingly shifting from communicable to NCDs. As of 2018, NCDs accounted for 89 percent of all deaths.[11] Urbanization has been increasing rapidly, which has brought changes in diets, types of employment, and levels of physical activity that have contributed to the shift towards NCDs. Underlying risk factors among adults for NCD-attributed mortality include relatively high rates of tobacco use (28 percent, nearly twice as high among males than females), raised blood pressure (20 percent), diabetes (raised blood glucose (13 percent) and obesity (32 percent; nearly twice as high among females than males.

Over the last decade, Turkey has significantly improved the supply of services under the Health Transformation Program, referred as the health reform of Government of Turkey, between 2003 and 2013. The improved provision of health services is reflected in improved health outcomes and increased health utilization rates, as well as changes of trends in health financing. While Turkey has largely achieved universal health coverage for basic primary care services, there are gaps due to high uncertainty with regard to COVID and its health system to address heightened population and demographic vulnerabilities. The most recent data in Turkey as of 2018 show that Turkey has a total of 1,534 inpatient medical institutions (hospital and other inpatient facilities) and over 231 thousand hospital beds, for a ratio of 2.83 hospital beds per 1,000 population. For the same period, there are 536 persons per physician, with a total of over 153 thousand physicians nationwide. The MoH Strategic Plan emphasizes the importance of increasing the number of the primary health care workforce and sets higher targets for 2030. Moreover, the Ministry has a national pandemic preparedness plan and various guidelines and measures such as COVID-19 Disease Guideline, Guidance to COVID-19 Outbreak Management and Working, etc., which are in line with WHO and other international standards.

Ankara

Ankara, with its population of 5,639,076 according to address-based population announced by Turkish Statistical Institute, as of December 31, 2019, is the second largest city after İstanbul. 50% of the population are under 32 years old. 88% of the population lives in the city center. Compared to its total population, Ankara has the highest number of higher education graduates. Around 15% of the total regional population has bachelor's or post-graduate degrees. Turkey's top higher education providers are located in Ankara, which makes Ankara the second province with highest number of higher education providers. There are 16 higher education units with well-known engineering and medical schools. Ankara accommodates more than 250,000 university students. Additionally, there are 29 research and development centers, 8 techno parks, 12 industrial zones (active and in establishment phase) and 39 advanced research institutes.[12]

In the last two decades, rapid growth in Turkey's economy naturally provides for the same trend in Ankara. As the capital city of Turkey, Ankara is the 2nd largest and center of economy on both national and global scale. Strong and stable economy of Ankara is benefited from geographical location, modern infrastructure and growing young population with the most qualified workforce. Proximity to the markets in EU, Middle East, North Africa, Asia and Russia is a catalyst for the foreign capital and international companies. Besides, more than 2,300 such companies preferred to be located in Ankara. The high trade volume of Ankara is an opportunity for investors and entrepreneurs planning to implement both national and global scale production and investment. With a foreign trade volume of 19.6 billion dollars, Ankara realized approximately 5% of Turkey's overall foreign trade volume as of year 2019. Key sectors of Ankara can be summarized as; construction and heavy machinery, defense and aerospace, medical technologies, and information and communication technologies.[13]

Due to its location in the center of the country, the region has been a historical junction of major trade routes and a crossroads of migratory streams. Throughout history, Ankara has witnessed battles between powerful

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[11] World Health Organization (2018). Turkey: World Health Organization Noncommunicable Diseases (NCD) Country Profiles, 2018. Geneva: World Health Organization. Most recent data.

[12] Discover Ankara, Ankara Development Agency

[13] http://www.investinankara.org/

armies in quest of domination. The city was an important cultural, trading and arts center in Roman times and a major trading center on the caravan route to the east in Ottoman times. However, it had lost importance by the 19th century. When Mustafa Kemal Atatürk chose Ankara as the base from which to direct the War of Independence, it once again became an important center. By consequence of its role in the war and its strategic position, it was declared the capital of the new Republic of Turkey on October 13, 1923. Ankara, known until that time for its rabbits, cats and goats, became the geographic, political and administrative center of Turkey, with all the government offices and foreign embassies transferred from İstanbul.[14]

Ankara is located in the northwest of Central Anatolia, "at the heart of Turkey" between the branches of Kizilirmak and Sakarya rivers, at an altitude of 850 meters. The city lies in the eastern edge of the Anatolian Plateau. It covers an area of 24,521 km^2 that ranks it the third biggest city in terms of total acreage. It has a continental climate. Cold and snowy winters are followed by hot and dry summers. Average temperatures range from 25 °C in the summer months to 5 °C in the winter months. July and August are the hottest months with almost zero precipitation while April and May record the highest rainfall. Snowfall is common from November to March 15.

No land acquisition or asset loss is expected within the scope of the project, 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. Likewise, there will not be any critical and/or natural habitats (natural resources) and known cultural or historical assets to be affected considering that minor refurbishment works will be carried out at existing facilities/buildings.

5.   Potential Environmental and Social Impacts and Mitigation

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 minor non-structural refurbishment for IT infrastructure upgrade activities through utilization of the existing data centers in Ankara and other provinces if needed, and minor refurbishment for setting up an EdTech Innovation Hub and PLL, respectively, will be the main items in terms of minor refurbishment. The EdTech Innovation Hub together with PLL under the Component 2, will be established 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, under the Component 2.2, the project will also develop an R&D Program for digital education programs, materials and other pedagogical tools to be developed with the involvement of start-ups, companies, industry partners and universities to test and develop products, software, and hardware for educational uses within the network of innovation.

Environmental and Social Risks

Key environmental issues are temporary and will be limited to those associated with minor non-structural refurbishment works at data centers to be utilized, with minor renovation at PLL for which equipment and furniture will be provided, and at the EdTech Innovation Hub. The minor renovation will be limited to walling and demolishing of some sections, electrical cabling and wiring, painting, establishment of firefighting 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

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[14] https://www.goturkey.com/destinations/ankara
[15] http://www.investinankara.org/ and Discover Ankara, Ankara Development Agency

system in the building might be removed and disposed in line with respective Turkish regulations. Such minor renovation 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 WBG EHS Guidelines.

The project will also finance the procurement of equipment for upgrade of IT infrastructure through utilization of existing data center(s) 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.

The environmental aspects of the activities to be financed under R&D Program for digital education programs, materials and other pedagogical tools under Subcomponent 2.2, will be analyzed and addressed within the scope of the Feasibility Study to be conducted during the project implementation.

Therefore, the environmental risk of the project is rated as "Moderate" (see Annex V for World Bank's Project Categorization) as the anticipated risks and impacts associated with the project activities are temporary, reversible and easily manageable through application of the WBG EHS Guidelines, Good International Industrial Practices (GIIPs), national regulations and site-specific mitigation measures.

The social risk rating for the project is also "Moderate". The project has an important positive impact in improving the distance learning system of MoNE, called EBA and implementing a new Digital Education System (NDES) 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 a techno-park, 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 Lab) mainly involves minor refurbishment works. Labor risks are low and associated with the refurbishment works, which has minor OHS risks.

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 exacerbates 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 of Chapter 3 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 throughout project implementation.

Above-mentioned risks are covered by ESS1, ESS2, ESS3, ESS4, and ESS10 (see Chapter 3).

PIU of MoNE will be primarily responsible for ensuring the environmental and social risks are mitigated at each stage of the project operation.

Mitigation Measures – Minor Refurbishment Works

The MoNE, through PIU, will ensure that all minor non-structural refurbishment works envisaged at the data center to be rented and minor refurbishment works at the building to be rented for the EdTech Innovation Hub Center including PLL will be carried out in compliance with the site-specific ESMPs to be prepared by utilizing the ESMP checklists for the minor refurbishment works provided in Annex IV. MoNE will refrain from large scale refurbishments that would affect the overall structure of the building. MoNE will also ensure that the site-specific ESMPs are included in the respective bidding documents and works contract. Main environmental and social issues related to refurbishment and to be considered in the ESMPs are:

- Generation of solid wastes (including e-wastes as relevant), noise, dust, wastewater and emission management;
- Hazardous materials management (including asbestos management, if relevant);
- Occupational Health and Safety (OHS) issues (including COVID-19 exposure concerns); and
- Labor issues.

Mitigation Measures – Operation of Data Center (under Subcomponent 1.2)

The subcomponent 1.2 will finance procurement of necessary hardware/service for the data centers, consultancies, feasibility studies, and technical know-how. The feasibility studies will also analyze environmental and social impacts and sustainability, including resilience to climate change and energy efficiency achievable for the new system and related IT infrastructure. Measures related to E&S will also be considered in the selection of the most appropriate means of expansion of the services to 5 million students.

The MoNE, through PIU, will ensure that the environmental and social aspects incorporated in the Terms of Reference (ToR) for the Feasibility Study for the IT infrastructure expansion of services under subcomponent 1.2. Main environmental and social risks and impacts to be addressed in the ToR for the feasibility study are:

- **Energy Consumption/Efficiency:** As noted, before, positive externalities are expected from the adoption of technologies such as cloud computing because of energy savings. This will reduce energy consumption and improve efficiency, leading to a substantial reduction of carbon emissions. Several key factors enable cloud computing to lower energy use and carbon emissions from IT are; (i) Dynamic Provisioning: Reducing wasted computing resources through better matching of server capacity with actual demand, (ii) Multi-tenancy: Flattening relative peak loads by serving large number of organizations and users on shared infrastructure, (iii) Server Utilization: Operating servers at higher utilization rates, and (iv) Data Center Efficiency: Utilizing advanced data center infrastructure designs that reduce power loss through improved cooling, power conditioning, etc. [16] MoNE/PIU will ensure that such kind of key factors are determined and analyzed for lower energy use and emissions within the feasibility study in the comparison of alternative solutions.
- **OHS Aspects:** The Ministry of Family, Labor and Social Services is the main organization responsible for OHS, in collaboration with other ministries and stakeholders, and for developing, implementing and enforcing legislation. The existing OHS Law governs workplace environments and industries (both public and private) as well as virtually all classes of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally

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[16] Cloud computing and the Sustainability: The Environmental Benefit of moving to the cloud (2010), Accenture, WSP and Microsoft

applicable across all sectors and many industries. Labor Inspectorate, which is a part of the Ministry, enforces labor and OHS laws, and conducts regular OHS and labor audits.

One of the particular issues to be considered within the scope of feasibility study is related to the fire precautions that the data center should be designed to prevent the start of fires through the implementation of national legislation (Regulation on the Protection of Buildings from Fire, Official Gazete No: 26735, dated December 12, 2007) and the internationally accepted life and fire safety standards. The other main considerations in the assessment of OHS issues within the scope of the feasibility studies is the electrical hazards related to the operation of data center.

MoNE/PIU will ensure that the data center will be operated in line with both the Law on Occupational Health and Safety (Official Gazete No.28339, dated June 30, 2012) and its relevant regulations, and also the World Bank Group's EHS Guidelines[17] and relevant ESSs, once it is appropriate.

- **Generation of E-waste and Disposal:** E-waste is considered as special waste and regulated by the Regulation on the Control of WEEE in Turkey. This regulation has been prepared in parallel with the Directive 2002/95/EC of the European Parliament and of the Council on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment and Directive 2002/96/EC of the European Parliament and of the Council on WEEE. Electrical and electronic equipment producers, distributers and consumers have various responsibilities for the collection, storage, reuse, recycling, and recovery of e-waste. The consumers are mainly responsible for (i) separate collection of WEEE based on the principles determined by the producers, and the municipalities, (ii) delivery of their WEEE to collection centers established by the distributers, municipalities, producers or processing facilities, and (iii) not to give their WEEE to informal collectors.

MoNE/PIU will ensure that the data center will be operated in compliance with national legislation and GIIPs through development of an Electronic Waste Management Plan, as appropriate, within the scope of feasibility study.

Mitigation Measures – Activities to be supported by the R&D Program (under Component 2)

In order to incentivize partnerships within the EdTech and support development of digital content and education service delivery, under the Component 2.2, the project will also develop a R&D Program for digital education programs, materials and other pedagogical tools to be developed with the involvement of start-ups, companies, industry partners and universities to test and develop products, software, and hardware for educational uses within the network of innovation. The program is expected to be utilized mostly for purchasing goods (equipment) and procuring consultancy services. Details of the R&D Program 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 as part of Component 2.

The MoNE, through PIU, will ensure that the tasks for addressing environmental and social aspects of the activities to be supported by the R&D Program are incorporated into final ToR for the feasibility study under Component 2. The feasibility studies will identify the details and consider environmental and social aspects of the activities to be supported under the R&D program.

Main tasks for addressing environmental and social aspects in the ToR for the feasibility study are:

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[17] https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines#:~:text=The%20EHS%20Guidelines%20contain%20the,reasonable%20costs%20by%20existing%20technology.

- **Screening of Activities (Ineligible Activities):** According to the WB's E&S Policy, the Bank classifies all projects into one of four classifications as *High Risk*, *Substantial Risk*, *Moderate Risk* or *Low Risk* taking into account relevant potential risks and impacts, such as the type, location, sensitivity and scale of the project; the nature and magnitude of the potential E&S risks and impacts; the capacity and commitment of the Borrower; and other areas of risks that may be relevant to the delivery of E&S mitigation measures and outcomes (see Annex V for World Bank's Project Categorization).

  Substantial Risk and *High Risk* activities such as major civil works, activities involving handling of significant volumes of hazardous chemical, etc. will be ineligible/avoided within the scope of activities to be supported by the R&D Program. Only activities, which are classified as *Moderate Risk* or *Low Risk*, can be supported.

  Besides, activities;

  (i)   requiring land or asset purchasing,
  (ii)   that may lead to involuntary resettlement,
  (iii)   that may involve child and forced labor,
  (iv)   involving significant conversion or degradation of critical natural habitats,
  (v)   that may have significant adverse social impacts and may give rise to significant social conflict,
  (vi)   that may involve adverse impacts on cultural heritage,

  will be avoided.

- **Turkish EIA Regulation Requirements:** The latest EIA Regulation has been published in the Official Gazette dated November 25, 2014 and numbered 29186 and it is largely in line with the EU Directive on EIA. The key relevant steps of the Turkish EIA procedure are screening, public consultation, scoping, disclosure and supervision. The EIA Regulation classifies projects into two categories: (i) Annex I projects; those are projects that have significant potential impacts and require an EIA, and (ii) Annex II projects; those are projects that may or may not have significant effects on the environment.

  Activities listed in Annex I of Turkish EIA Regulation should be avoided, and requirements thereunder the regulation should be determined for the activities to be supported by the R&D Program within the scope of feasibility studies.

- **Possible Environmental and Social Aspects:** Possible environmental and social risks and impacts are expected to be similar to the ones described in the operation of the data center (see above) as energy consumption/efficiency, OHS issues, and e-waste management, but may not be limited to. These issues, together with any other anticipated E&S risks and impacts, will be assessed within the scope of the feasibility studies, depending on the activities to be supported by the R&D Program, and by considering the issues defined above in the operation of the data center. All activities will be in compliance with national legislation (including acceptable OHS practices envisaged under national regulation), WBG EHS Guidelines and GIIPs.

6.   Environmental and Social Management Procedures

The MoNE, as the implementing agency, is responsible for the overall implementation of the project through the PIU within the DGIET. The PIU will have day-to-day responsibility for project management and support, including ensuring that project implementation is compliant with the World Bank's ESF, particularly the relevant ESSs; the World Bank Group's EHS Guidelines; WHO COVID-19 Guidelines; and this ESMF. The PIU will be adequately staffed to oversee the project's work nationally.

Implementation of this ESMF will include the following stages, to be undertaken by the PIU.

Screening:
E&S risk categorization of minor structural refurbishment works envisaged at the data center to be rented and minor refurbishment works at the building to be rented for the EdTech Innovation Hub Center including the PLL have been determined by the WB and the PIU as "***Low to Moderate Risk***.

Minor refurbishment works are regarded as "No-Annex"/ "No-EIA" project according to the Turkish EIA Regulation (i.e. exempt from EIA).

Age of employment will be considered age 18 and above, and hence no child or forced labor will be engaged in any of the project financed activities.

Environmental and Social Assessment:
PIU will prepare a site-specific ESMP for each of the minor refurbishment works assigned a risk rating as "***Low to Moderate Risk***", by utilizing the ESMP checklists for the minor refurbishment works provided in Annex IV and will ensure implementation of these.

SEP already prepared for the project will be applicable to all project financed activities.

PIU will perform an overall quality assurance function that the documents prepared meet the World Bank requirements. In reviewing a site-specific ESMP, PIU will also confirm that it is clear, feasible and appropriate.

Consultation and Disclosure:
Given the need for social distancing during the COVID-19 pandemic, stakeholder consultations for the E&S instruments, will be conducted virtually whenever possible, as per instructions in the SEP. The SEP has identified key stakeholders and organized consultations for information exchange about the project and its risks and impacts. All instruments will be disclosed on the PIU website with print copies also available at their offices. Print copies of ESMPs will also be made available at the refurbishment sites. These will be disclosed on the WB website as well.

Review and Approval of E&S Plans:
The WB will provide prior review and approval to the ESMPs. During the implementation of the project, the Bank can mutually agree with PIU that PIU conducts prior review of the ESMPs and the World Bank conducts post review.

ESMPs, will be attached to the procurement documents and be part of the contract with the Contractor selected to carry out the refurbishment works.

Implementation:
The MoNE, through PIU, will be responsible for the implementation of the instruments.

7. Institutional Arrangements and Capacity for ESMF Implementation

The project will be implemented by MoNE through the PIU within DGIET. DGEIT will have overall responsibility for the 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, coordination, application of the of the SSDE Program activities, and implementation of the requirements of the ESF. PIU will be supported by technical specialists of the MoNE and technical consultants. The relevant structures will be strengthened by the recruitment of additional staff/consultants responsible for technical design and implementation, overall administration, procurement, financial management and implementation of ESF requirements. Also, the required set of operational manuals and other management resources – including a detailed project description to guide implementation – will be developed.

DGIET will manage the project but will require support from other DGs, especially in the curricular, pedagogical and teacher development issues, as well as from DGs and programs providing specialized support (school counseling, education for migrants and in emergencies, etc.). The DGIET and PIU will

coordinate closely with other DGs of MoNE, as well as with external partners – national and international.

Delivery will be coordinated with the support of other PLEDs and DLEDs. At the local and school levels, the main frontline actors are the public schools, where SMs which are under the authority, command and monitoring of DLEDs and PLEDs is responsible for all school-level active involvement on distance education. SMs together with PLEDs and DLEDs will be provided with EBA platform for planning and monitoring the distance education activities and to collect teachers, parents and students feedback.

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 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.

A DRM-EiE Steering Committee (SC) is established to oversee the coordination, monitoring, and implementation of MoNE's response to crises, including now the COVID-19 response. This is chaired by the Minister of Education with delegation at the Deputy Ministerial level as needed. The SC will be responsible for overall implementation and coordination of MoNE's education response during the emergency and will delegate authority for operational issues to the responsible PIUs, as well as facilitate interactions across different departments. The Directorate Generals for education levels (Basic, Secondary Education, TVET, DG for Religious Education, DG for Special Education and Counseling Services, and other related DGs) will be responsible for coordination of information to schools on the policies, guidelines, and services provided by MoNE, including from the SSDE project.

The PIU's responsibilities will be as follows:

- Screening all activities undertaken by the project in relation to eligibility for financing under the project
- To perform an overall quality assurance function that the documents prepared, particularly ESMPs, meet the World Bank requirements and confirm that it is clear, feasible and appropriate
- To perform consultation and disclosure activities regarding ESMF and SEP
- To conduct prior review of the ESMPs if the Bank can mutually agree with PIU during the implementation of the project
- Be responsible for monitoring and evaluation (M&E) activities, overseeing progress related to project activities, outcomes, and results
- To submit quarterly reports of project implementation to the Bank as per commitment on the ESCP
- Conduct relevant stakeholder engagement activities including the functioning of the grievance redress mechanism
- Supervise contractors throughout project implementation

The PIU will also ensure the followings:

- All minor refurbishment works are carried out in compliance with the site-specific ESMPs prepared
- The site-specific ESMPs are included in the works contracts
- The environmental and social aspects incorporated in the final ToR for the Feasibility Study for the IT infrastructure expansion of services under subcomponent 1.2
- Key factors are determined and analyzed for lower energy use and emissions within the feasibility study in the comparison of alternative solutions (within the feasibility studies under subcomponent 1.2)

- The data center will be operated in line with both the Law on Occupational Health and Safety and its relevant regulations, and also the World Bank Group's EHS Guidelines, once it is appropriate
- The data center will be operated in compliance with national legislation and GIIPs through development of an Electronic Waste Management Plan, as appropriate (within the feasibility studies under subcomponent 1.2)
- The tasks for addressing environmental and social aspects of the activities to be supported by the R&D Program are incorporated into final ToR for the feasibility study under Component 2

Budget

The budget regarding EA capacity building and PIU strengthening as well as monitoring are covered under Component 3 of the project.

8. Monitoring and Reporting

The PIU will be responsible for monitoring and evaluation (M&E) activities, overseeing progress related to project activities, outcomes, and results. Through the PIU, the MoNE will be responsible for: (a) collecting and consolidating all data related to their specific suite of indicators; (b) evaluating results; and (c) reporting results to the WB regularly and before each implementation support mission.

There will be two types of reports, monthly from contractors to the PIU and quarterly from the PIU to the Bank:

(i) **Monthly Reports:** Contractors for minor refurbishment works will prepare and provide monthly reports to the PIU on each activity being undertaken. These reports will include progress on and statistics related to the implementation of the ESMPs, statistics related to local hotlines, any grievances received via the GRM and information on their resolution, and any other relevant information.

(ii) **Quarterly Reports:** The PIU will submit an overall report of project implementation to the Bank as per commitment on the ESCP. These reports will include environmental, social, health and safety performance of the project, including but not limited to the implementation of the ESCP, status of preparation and implementation of ESMF and E&S documents required under ESCP, a summary of activities for each minor refurbishment work, stakeholder engagement activities and performance of grievance mechanism(s) including grievances log.

Additionally, for any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills etc.), the contractors for minor refurbishment works will notify MoNE in 3 business days, and MoNE will notify the World Bank about the incident as soon as it is informed (not later than 3 business days). The incident report including root cause analysis, precautions and compensation measures taken, will be submitted to MoNE in 30 business days and MoNE will forward the incident report to the World Bank. MoNE will also report its findings to the World Bank in its quarterly reports, as needed to bring issues to the attention of the World Bank. The World Bank's Task Team for the project will, on occasion, and as required, also visit project sites as part of project supervision.

9. Stakeholder Engagement

A standalone SEP has been prepared for the project detailing stakeholder identification, method and subject of communication and grievance redress mechanism. The SEP is referred here for detail requirements on stakeholder engagement and GRM.

10. Grievance Redress Mechanism (GRM)

MoNE has a hotline (call center) called MEBIM (#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 communication

center with 180 personnel (2018). This communication 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.

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

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.

Within the scope of the project, the existing grievance mechanism of MEBIM Communication 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 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 grievance mechanism. To ensure that the grievance mechanism 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 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 re-disclosed publicly.
2. **PIU Level, 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 grievance mechanism 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.

For worker's grievances, MoNE's MEBIM, will be utilized for the project workers apart from the new call center to be established as a dedicated project GRM for EBA platform. In addition, MoNE also has a process for workers'/employees of MoNE to handle issues related to sexual exploitation and abuse/sexual harassment (SEA/SH) at work place. If an employee faces such SEA/SH issue s/he can either apply to a higher level superior or directly go to police station, as stipulated in the national referral system of the country for dealing such cases. The content and procedures of the new grievance mechanism will also have a reporting line on such cases in regard to SEA/SH issues and will be handled under full confidentiality.

The details of the GRM is set out in the SEP and will be also incorporated in the Project Operational Manual.

11. ESMF Disclosure and Consultation

Consistent with the requirements for stakeholder engagement and taking into account COVID-19 related quarantine and lockdown measures, this section describes the consultation process and how project-specific information will be disclosed in relation to this ESMF and each individual project activity. Consistent with the standalone SEP prepared for the project, the section describes how to achieve communication between the PIU and the affected communities and stakeholders.

Although the limitations of the nature of COVID-19 outbreak and its diffusion mechanism, initial consultation has been widely opened to public authorities PLEDs, DGs of MoNE, teachers, school managers, students, guardians, parents and NGOs via online channels (official website announcements, social media, official letters, e-mails). As per the SEP, the project will adapt to different situation and requirements, as they develop to disclose information regarding COVID-19 and other relevant issues.

The preliminary strategy for public consultation and disclosure has been defined under the SEP and will be followed throughout project implementation.

Further, following guidelines has been suggested by the WB for projects under preparation, to be adopted while conducting stakeholder consultation and engagement:

- Review the country COVID-19 spread in the project area, and the restrictions put in place by the government to contain virus spread;
- Review the SEP, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;
- Be sure that PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices;
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project;
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project weblinks/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

The ESMF has been disclosed both in country on the MoNE website URL and on the World Bank website on October 19, 2020. The ESMF was open submission of comments for two weeks until November 09, 2020. Contact e-mail, telephone, address and social network account were used to deliver the comments.

As a result of the consultation, a total of approximately 200 feedbacks from students (7), teachers (182), parents (4) and others (9) were collected. The feedbacks were included in Public Consultation Summary provided under Annex-IV.

In addition to the public consultation forms, Provincial Directorates of National Education and relevant Departments of the Ministry were officially requested to submit their opinions and suggestions on October 22, 2020. Their opinions and suggestions on the ESMF were received until November 1, 2020.

Received opinions and suggestions were categorized and submitted on December 21, 2020 to the following departments of DGIET for them to provide a detailed information about their tasks. The answers are presented again in Annex-VI.

All these comments were evaluated and those relevant to the project were reflected in the relevant sections of the ESMF. Those outside the scope of the project were conveyed to the relevant Departments.

The comments were on issues such as providing device (computer, tablet, etc.) support for students with physical and / or mental disabilities, strengthening the internet infrastructure at schools in rural areas, developing content for teacher training, parent guidance and community engagement activities, ensuring the access of foreign students to distance education.

Annexes

I.   Abbreviations and Acronyms
II.   National Environmental Legislation and International Agreements and Conventions
III.   Resource List: COVID-19 Guidance
IV.   ESMP Checklists for Minor Refurbishment Works
V.   World Bank's Project Categorization
VI.   Public Consultation Summary

I. Abbreviations and Acronyms

CDC	Centre for Disease Control and Prevention
CDN	Content Delivery Network
CLAs	Central-Level Agencies
COVID-19	Coronavirus Disease 2019
DG	Directorate General
DGIET	Directorate General for Innovation and Educational Technologies
DLEDs	District Level Education Directorates
DRMIS	Disaster Risk Management in Schools
E&S	Environmental and Social
EA	Executing Agency
EBA	Eğitim Bilişim Ağı (Online Education System)
ECA	Europe and Central Asia
EdTech	Education Technologies
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EiE	Education in Emergencies
EIR	Education Infrastructure for Resilience
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Mitigation Plans
ESS	Environmental and Social Standard
EU	European Union
GBV	Gender Based Violence
GD	General Directorate
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
IaaS	Infrastructure as a Service
LAYS	Learning Adjusted Years of Schooling
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MoEU	Ministry of Environment and Urbanization
MoH	Ministry of Health
MoNE	Ministry of National Education
NCDs	Non-Communicable Diseases
OHS	Occupational Health and Safety
PaaS	Platform as a Service
PAP	Project Affected Parties
PDO	Project Development Objective
PIU	Project Implementation Unit
PLEDs	Provincial Level Education Directorates
PLL	Professional Learning Lab
POM	Project Operations Manual
PPE	Personal Protective Equipment
R&D	Research and Development
SC	Steering Committee
SEP	Stakeholder Engagement Plan

SM	School Management
SSDE	Safe Schooling and Distance Education
SuTP	Syrians under temporary Protection
ToR	Terms of Reference
UN	United Nations
WB	World Bank
WEEE	Waste Electrical and Electronic Equipment
WHO	World Health Organization

II. National Environmental Legislation and International Agreements and Conventions

National Environmental Legislation

Complementary to the Environmental Law and its regulations, other laws also govern the protection and conservation of the environment, resources and cultural and natural assets, the prevention and control of pollution, the implementation of measures for the prevention of pollution, health, and safety and labor issues. Some of these laws are:

- Conservation of Cultural and Natural Assets Law (Law No: 2863, Date of Ratification: 1983)
- Energy Efficiency Law (Law No: 5627, Date of Ratification: 2007)
- Forestry Law (Law No: 6831, Date of Ratification: 1956)
- Groundwater Law (Law No: 167, Date of Ratification: 1960)
- Labor Law (Law No: 4857, Date of Ratification: 2003)
- Law on Soil Protection and Land Use (Law No: 5403; Date of Ratification 2005)
- Law on Soil Protection and Land Use (Law No: 6537; Date of Ratification 2014)
- Municipality Law (Law No: 5393, Date of Ratification: 2005)
- Metropolitan Municipality Law (Law No: 5216, Date of Ratification: 2004)
- National Parks Law (Law No: 2873, Date of Ratification: 1983)
- Occupational Health and Safety Law (Law No: 6331, Date of Ratification: 2012)
- Pastures Law (Law No: 4342, Date of Ratification: 1998)
- Public Health Law (Law No: 1593, Date of Ratification: 1930)
- Social Insurances and General Health Insurance Law (Law No: 5510, Date of Ratification: 2006)

In line with the Environmental Law and other supplementary laws, several regulations, communiqués and ordinances have been published since 1983. A comprehensive (though non exhaustive) list of these regulations, communiqués and ordinances is given below:

Air Quality Control and Management
- Regulation Concerning Follow up of Greenhouse Gas Emissions, Official Gazette date: May 31, 2017, No: 30082.
- Regulation on the Control of Air Pollution from Heating, Official Gazette date: January 13, 2005, No: 25699.
- Regulation on the Control of Exhaust Emissions, Official Gazette date: March 11, 2017, No: 30004.
- Industrial Air Pollution Control Regulation, Official Gazette date: December 20, 2014, No: 29211.
- Regulation on Assessment and Management of Air Quality, Official Gazette date: June 6, 2008, No: 26898.

Environmental Management, Permitting and Planning
- Environmental Auditing Regulation, Official Gazette date: November 21, 2008 and No: 27061.
- Environmental Impact Assessment Regulation, Official Gazette date: November 25, 2014 and No: 29186.
- Regulation Concerning Environmental Land Use Plans, Official Gazette date: November 11, 2008 and No: 27051.
- Regulation on Environmental Permit and Licenses, Official Gazette date: September 10, 2014, No: 29115.
- Regulation for Starting up and Operating a Work Place, Official Gazette date: August 10, 2005, No: 25902.

Health and Safety
- Communiqué on Hazard Classes List related to Occupational Health and Safety, Official Gazette date: March 29, 2013, No: 28602.
- First Aid Regulation, Official Gazette date: July 29, 2015, No: 29429.
- Heavy and Hazardous Works Regulation, Official Gazette date: June 16, 2004, No: 25494.
- Health and Safety Signs Regulation, Official Gazette date: September 11, 2013, No: 28762 (based on EU Council Directive 92/58/EEC dated June 24, 1992).
- Regulation Concerning the Use of Personal Protection Equipment at Workplaces, Official Gazette date: July 2, 2013, No: 28695 (based on EU Council Directive 89/656/EEC dated November 11, 1989).
- Regulation on Health and Safety in Fixed Term and Temporary Employment, Official Gazette date August 23, 2013, No: 28744
- Regulation on Health and Safety Measures in the Use of Work Equipment, Official Gazette date: April 25, 2013, No: 28628.
- Regulation on Health and Safety Measures to be taken at Works Involving Chemicals, Official Gazette date: August 12, 2013, No: 28733.
- Regulation on Methods and Essentials of Work Health and Safety Training for Workers, Official Gazette date: May 15, 2013, No: 28648.
- Regulation on Occupational Health and Safety, Official Gazette date: December 9, 2003, No: 25311) (based on EU Council Directive 89/391/EEC dated June 6, 1989)
- Regulation on Radiation Safety, Official Gazette date: March 24, 2000, No: 23999.

Management of Chemicals and Other Dangerous Substances
- Regulation Concerning the Classification, Packaging, and Labeling of Dangerous Substances and Preparations, Official Gazette date: December 11, 2013, No: 28848, repeated.
- Regulation Concerning the Material Safety Data Sheets for the Dangerous Substances and Preparations, Official Gazette date: December 3, 2014, No: 29204.
- Regulation on the Inventory and Control of Chemicals, Official Gazette date: December 26, 2008, No: 27092 (repeated).

Nature Protection
- Regulation on Pastures, Official Gazette date: July 31, 1998, No: 23419.
- Regulation on the Protection of Wetlands, Official Gazette date: April 4, 2014, No: 28962.
- Regulation on Procedures and Principles Concerning the Protection of Game and Wild Animals and their Habitats and Combat with their Pests, Official Gazette date: October 24, 2005, No: 25976.

Noise Control and Management
- Regulation on the Assessment and Management of Environmental Noise, Official Gazette date: June 4, 2010, No: 27601.
- Regulation on the Environmental Noise Emission caused by Equipment used Outdoors, Official Gazette date: June 30, 2016, No: 29758.

Soil Quality Control and Management
- Implementation Regulation on Soil Protection and Land Use, Official Gazette date: December 15, 2005, No: 26024.
- Regulation on the Control of Soil Pollution and Polluted Areas by Point Sources, Official Gazette date: June 8, 2010, No: 27605.

Waste Management
- Regulation of Waste Management, Official Gazette date: April 2, 2015, No: 29314.
- Regulation Concerning the Landfill of Wastes, Official Gazette date: March 26, 2010, No: 27533.
- Regulation on the Control of Excavation Materials, Construction and Demolition Wastes, Official Gazette date: March 18, 2004, No: 25406.
- Regulation on the Control of Medical Wastes, Official Gazette date: January 25, 2017, No: 29959.
- Regulation on the Control of Packaging Wastes, Official Gazette date: December 27, 2017, No: 30283.
- Regulation on the Control of Waste Batteries and Accumulators, Official Gazette date: August 31, 2004, No: 25569.
- Regulation on the Control of Waste Oils, Official Gazette date: July 30, 2008, No: 26952.
- Zero Waste Regulation, Official Gazette date: July 12, 2019, No: 30829.
- Regulation on the Control of Waste Tires, Official Gazette date: March 11, 2015, No: 29292.
- Regulation on the Control of Waste Electrical and Electronic Equipment, Official Gazette date: May 22, 2012, No: 28300.

Water Quality Control and Management
- Ordinance on Groundwater Resources, Official Gazette date: August 8, 1961, No: 10875.
- Regulation Concerning Protection of Ground Waters against Pollution and Deterioration, Official Gazette date: May 22, 2015, No: 29363.
- Regulation Concerning Quality of Surface Waters Planned or Used as Drinking Water Supply, Official Gazette date: June 29, 2012, No: 28338.
- Regulation Concerning Water for Human Consumption, Official Gazette date: March 7, 2013, No: 28580.
- Regulation on the Control of Pollution Caused by Dangerous Substances in Water Environment, Official Gazette date: November 26, 2005, No: 26005.
- Regulation on Pit Opening Where Sewer System Construction is not Applicable, Official Gazette date: March 19, 1971, No: 13783.
- Surface Water Quality Management Regulation, Official Gazette date: April 15, 2015, No: 29327.
- Urban Wastewater Treatment Regulation, Official Gazette date: January 8, 2006, No: 26047.
- Regulation Concerning Wastewater Collection and Disposal Systems, Official Gazette date: January 6, 2017, No: 29940.
- Water Pollution Control Regulation, Official Gazette date: December 31, 2004, No: 25687.

General
- Turkey Building Earthquake Regulation, Official Gazette date: March 18, 2018, No: 30364 (repeated).
- Regulation Concerning the Decrease of Ozone Depleting Substances, Official Gazette date: April 7, 2017, No: 30031.
- Regulation Concerning the Increase of Efficiency in the Usage of Energy and Energy Resources, Official Gazette date: October 27, 2011, No: 28097.
- Regulation on Control of Large-Scale Industrial Accidents, Official Gazette date: August 18, 2010, No: 27676.
- Regulation on the Implementation of the Law Concerning Private Security Services, Official Gazette date: September 26, 2009, No: 27358.

International Agreements and Convention

Turkish national policy on protection of environment, cultural heritage and conservation of biological resources has been formulated on the basis of relevant international agreements signed or ratified by Turkey. Relevant environmental, OHS and international labor agreements and conventions ratified by Turkey are listed below:

- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
- Bern Convention on Protection of Europe's Wild Life and Living Environment
- Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES)
- Convention on Long-range Transboundary Air Pollution
- European Convention on the Protection of the Archaeological Heritage
- European Landscape Convention
- International Convention for the Protection of Birds
- Montreal Protocol on Substances that Deplete the Ozone Layer
- Paris Convention on the Protection of the World Cultural and Natural Heritage
- Ramsar Convention on Wetlands of International Importance Especially as Wildfowl Habitat
- Stockholm Convention on Persistent Organic Pollutants
- United Nations Convention to Combat Desertification in Countries Experiencing Serious Drought and/or Desertification, Particularly in Africa
- United Nations (UN) Framework Convention on Climate Change (Kyoto Protocol)
- UN (Rio) Convention on Biological Diversity
- Vienna Convention or the Protection of the Ozone Layer
- ILO Occupational Safety and Health Convention
- Occupational Health Services Convention
- Labor Inspection Convention
- Promotional Framework for Occupational Safety and Health Convention
- Worst Forms of Child Labor Convention

III. Resource List: COVID-19 Guidance

WHO Guidance

Advice for the public

- WHO advice for the public, including on social distancing, respiratory hygiene, self-quarantine, and seeking medical advice, can be consulted on this WHO website: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public

Technical guidance

- Infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected, issued on March 19, 2020
- Recommendations to Member States to Improve Hygiene Practices, issued on April 1, 2020
- Severe Acute Respiratory Infections Treatment Center, issued on March 28, 2020
- Infection prevention and control at health care facilities (with a focus on settings with limited resources), issued in 2018
- Laboratory biosafety guidance related to coronavirus disease 2019 (COVID-19), issued on March 18, 2020
- Laboratory Biosafety Manual, 3rd edition, issued in 2014
- Laboratory testing for COVID-19, including specimen collection and shipment, issued on March 19, 2020
- Prioritized Laboratory Testing Strategy According to 4Cs Transmission Scenarios, issued on March 21, 2020
- Infection Prevention and Control for the safe management of a dead body in the context of COVID-19, issued on March 24, 2020
- Key considerations for repatriation and quarantine of travelers in relation to the outbreak COVID-19, issued on February 11, 2020
- Preparedness, prevention and control of COVID-19 for refugees and migrants in non-camp settings, issued on April 17, 2020
- Coronavirus disease (COVID-19) outbreak: rights, roles and responsibilities of health workers, including key considerations for occupational safety and health, issued on March 18, 2020
- Oxygen sources and distribution for COVID-19 treatment centers, issued on April 4, 2020
- Risk Communication and Community Engagement (RCCE) Action Plan Guidance COVID-19 Preparedness and Response, issued on March 16, 2020
- Considerations for quarantine of individuals in the context of containment for coronavirus disease (COVID-19), issued on March 19, 2020
- Operational considerations for case management of COVID-19 in health facility and community, issued on March 19, 2020
- Rational use of personal protective equipment for coronavirus disease 2019 (COVID-19), issued on February 27, 2020
- Getting your workplace ready for COVID-19, issued on March 19, 2020
- Water, sanitation, hygiene and waste management for COVID-19, issued on March 19, 2020
- Safe management of wastes from health-care activities, issued in 2014
- Advice on the use of masks in the community, during home care and in healthcare settings in the context of the novel coronavirus (COVID-19) outbreak, issued on March 19, 2020
- Disability Considerations during the COVID-19 outbreak, issued on March 26, 2020

WORLD BANK GROUP GUIDANCE

- Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, issued on March 20, 2020
- Technical Note: Use of Military Forces to Assist in COVID-19 Operations, issued on March 25, 2020
- ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects, issued on April 7, 2020
- Technical Note on SEA/H for HNP COVID Response Operations, issued in March 2020
- Interim Advice for IFC Clients on Preventing and Managing Health Risks of COVID-19 in the Workplace, issued on April 6, 2020
- Interim Advice for IFC Clients on Supporting Workers in the Context of COVID-19, issued on April 6, 2020
- IFC Tip Sheet for Company Leadership on Crisis Response: Facing the COVID-19 Pandemic, issued on April 6, 2020
- WBG EHS Guidelines for Healthcare Facilities, issued on April 30, 2007

ILO GUIDANCE

- ILO Standards and COVID-19 FAQ, issued on March 23, 2020 (provides a compilation of answers to most frequently asked questions related to international labor standards and COVID-19)

MFI GUIDANCE

- ADB Managing Infectious Medical Waste during the COVID-19 Pandemic
- IDB Invest Guidance for Infrastructure Projects on COVID-19: A Rapid Risk Profile and Decision Framework
- KfW DEG COVID-19 Guidance for employers, issued on March 31, 2020
- CDC Group COVID-19 Guidance for Employers, issued on March 23, 2020

IV.   ESMP Checklists for Minor Refurbishment Works[18]

PART 1: General Project and Site Information

GENERAL		
Country	Turkey	
Project title		
Scope of project and activity		
SITE DESCRIPTION		
Name of site		
Describe site location		Attachment 1: Site Map [ ] Y [ ] N
Who owns the land?		
Description of geographic, physical, biological, geological, hydrographic and socio-economic context, as appropriate		
Locations and distance to nearest sensitive receptors such as hospitals, health care units, schools, houses?		
Locations and distance for potential material sourcing especially aggregates, water, stones, as appropriate		
LEGISLATION		
Identify the infrastructures used by the project such as sewer system, electricity, water network etc.		
Identify national & local legislation & permits that apply to project activity (i.e. 1/1000 or 1/5000 scaled master plan arrangements, construction/refurbishment permit, building permit etc.)		
PUBLIC CONSULTATION		
Identify when / where the public consultation process took place		
Brief summary of the issues and concerns raised by the stakeholders		

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[18] The checklists contained in this annex point out main impacts and mitigation measures, but are not meant to be exhaustive in their coverage. Impact assessment and mitigation planning must be tailored to each individual subproject, as appropriate.

PART 2: Environmental/Social Screening

ENVIRONMENTAL/SOCIAL SCREENING			
Will the site activity include/involve any of the following??	**Activity/Issue**	**Status**	**Triggered Actions**
	A. Building rehabilitation and minor refurbishment	[ ] Yes [ ] No	If yes, then see Section **A** below
	B. Hazardous or toxic materials[19]	[ ] Yes [ ] No	If yes, then see Section **B** below
	C. Traffic and Pedestrian Safety	[ ] Yes [ ] No	If yes, then see Section **C** below

PART 3: Mitigation Measures

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
0. General Conditions	Design/Planning considerations Notification Resource Efficiency	(a) MoNE will apply the concept of universal access[20] to the design and refurbishment/renovation of existing structures. (b) The facilities (data center, hub, etc.) will be designed to prevent the start of fires through the implementation of national legislation (Regulation on the Protection of Buildings from Fire, Official Gazette No: 26735, dated December 12, 2007) and the internationally accepted life and fire safety standards. (c) Structures will be checked for seismic resilience, as appropriate. Provisions of "Regulations for the Structures to be Built in Disaster Areas" published in the Official Gazette No. 26582 dated 14.07.2007 and "Turkey Building Code" of Disaster and Emergency Management Administration published in the Official Gazette No30364 dated 18.03.2018 that came into force in 01.01.2019 will be strictly followed. (d) The relevant local and environment related authorities and communities will be notified of upcoming activities. (e) The public will be notified of the works, including the COVID-19 measures taken on sites, through appropriate notification in the media and/or at publicly accessible sites (including the site of the works). (f) All legally required permits will be acquired for refurbishment and/or renovation. (g) The Contractor notifies MoNE in 3 business days in case of any significant event occurs. MoNE will notify the World Bank about any significant incident (accidents, spills, fatalities, etc.) as soon as it is

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[19] Toxic / hazardous material includes but is not limited to asbestos, toxic paints, noxious solvents, removal of lead paint, etc.
[20] Universal access means unimpeded access for people of all ages and abilities in different situations and under various circumstances.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		informed (not later than 3 business days) and will send an incident investigation report together with the corrective action plan in 30 business days to the World Bank. (h) MoNE and the Contractor will implement technically and financially feasible measures for improving efficient consumption of energy water and raw materials, as well as other sources.
A. General Rehabilitation and/or Minor Refurbishment Activities	Air Quality	(a) There will not be any major demolition activities other than minor demolishing of some sections/walls. Appropriate dust suppression methods will be applied as necessary. (b) The surrounding environment (sidewalks, roads) shall be kept free of debris to minimize dust. (c) There will be no open burning of construction/waste material at the site. (d) There will be no excessive idling of construction vehicles at sites.
	Noise and Vibration	(a) Noise during renovation/refurbishment works will be limited to restricted times identified in the relevant legislation. (b) During operations, the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential/sensitive areas as possible. (c) Impacts related to noise and vibration will be controlled in line with the relevant standards.
	Wastewater	(a) Wastewater generated at the site will be connected to the sewerage system, if possible and approved by local authorities. If this is not possible, it will be deposited in septic tank that will be impervious, in accordance with "Regulation on Pit Opening Where Sewer System Construction is not Applicable" being published in Official Gazette No.13783 dated 19.03.1971. Wastewater collected in the tank will be removed periodically by sewage trucks, and disposal will be provided within the scope of the protocol to be made with the municipality that has a wastewater infrastructure system. (b) Site/construction vehicles and machinery will be washed only in designated areas.
	Waste Management	(a) Wastes to be generated will be managed in accordance with the waste management hierarchy (prevent, reduce, reuse, recycle, energy recovery, disposal). (b) Waste collection and disposal pathways and sites will be identified for all major waste types expected from all activities. (c) All kinds of solid waste will be collected and disposed properly in accordance with environmental legislation. (d) The records of waste disposal will be maintained as proof for proper management as designed. (e) Whenever feasible the Contractor will reuse and recycle appropriate and viable materials (except asbestos). (f) There will not be any onsite waste management facilities such as incinerator and wastewater treatments works.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		(g) Only segregated wastes (i.e. hazardous / non-hazardous, recyclable / non-recyclable) will be temporarily stored in designated storage area that will meet the standards set by the relevant legislation before final disposal outside the site. (h) Waste recycling, transport and disposal will be carried out by means of licensed companies and/or related municipalities. (i) E-wastes to be generated will be collected separately and delivered to relevant collection center(s) in accordance with Regulation on the Control of Waste Electrical and Electronic Equipment (Official Gazette date: May 22, 2012, No: 28300). (j) Wastes will not be given to informal collectors. (k) Personal hygiene material/equipment wastes (such as single use masks, gloves) will be collected, temporary stored, transported and delivered to waste processing facilities in accordance with the Circular 2020/12 of MoEU on COVID-19 Measures in the Management of Personal Hygiene Equipment Wastes.
	Labor issues (Workers entering project sites; Co-workers becoming infected; Workers introducing infection into community/general public)	(a) Consider ways to minimize/control movement in and out of construction/refurbishment site. (b) If workers are accommodated on site require them to minimize contact with people outside the construction/refurbishment site or prohibit them from leaving the site for the duration of their contract. (c) Implement procedures to confirm workers are fit for work before they start work, paying special to workers with underlying health issues or who may be otherwise at risk. (d) Check and record temperatures of workers and other people entering the site or require self-reporting prior to or on entering. (e) Provide daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures. (f) Require workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor if they have symptoms or are feeling unwell. (g) Prevent a worker from an affected area or who has been in contact with an infected person from entering the site for 14 days. (h) Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days. (i) prepare code of conduct that will be shared with project workers during employment. (j) Contact details of worker's grievance mechanism will be provided.
	Occupational Health and Safety (Worker Safety and COVID-19 exposure concerns)	(a) All activities will be implemented in line with both the Law on Occupational Health and Safety (Official Gazette No.28339, dated June 30, 2012) and its relevant regulations, and also the World Bank Group's EHS Guidelines. (b) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner and is designed to minimize risks on neighboring residents and environment.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		(c) The Contractor will ensure a safe working environment for the workers and supply appropriate personal protective equipment (PPE) in line with international best practice and Turkish Legislation including the health and safety measures related to COVID-19 provided by the Ministry of Health and Ministry of Family, Labor and Social Services (always hardhats, as needed masks and safety glasses, harnesses and safety boots, etc.)
		(d) The Contractor will assign personnel with relevant certification and experience in charge of occupational health and safety.
		(e) Before the refurbishment works start, a Risk Assessment study will be implemented for all works to be carried out. Relevant procedures and plans (including "Emergency Plans") will be put in place. Both the Risk assessment and Emergency Response Plans will take into consider the COVID-19 risks and other communicable disease risks, as relevant.
		(f) Appropriate signposting of the sites will be provided and then workers will be informed of key rules and regulations to follow.
		(g) Occupational Health and Safety (OHS) trainings and toolbox talks will be provided to the employees including the code of conduct indicating the possible risks regarding the work site and works to be carried out. These will include regular trainings to workers on COVID-19 symptoms, how to be protected and what to do when symptoms appear.
		(h) Both trainings and incidents (fatalities, lost time incidents, any significant events including spills, fire, outbreak of pandemic or communicable diseases, social unrest, etc.) will be recorded.
		(i) Guidance, directives and recommendations of Ministry of Health, Ministry of Family, Labor and Social Services, and World Health Organization shall be followed and all relevant necessary measures shall be taken, both for occupational health and safety of employees and for workplaces, in case of an outbreak of any other pandemic/communicable disease including COVID-19.
B. Toxic Materials	Asbestos management	(a) If asbestos is located on the site, it will be marked clearly as hazardous material.
		(b) When possible, the asbestos will be appropriately contained and sealed to minimize exposure.
		(c) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust.
		(d) Asbestos will be handled and disposed by skilled and experienced professionals.
		(e) If asbestos material is be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately. Security measures will be taken against unauthorized removal from the site.
		(f) The removed asbestos will not be reused and will be disposed in a licensed facility in compliance with the national legislation.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
	Toxic / hazardous waste management	(a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties and handling information. (b) The containers of hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching. (c) The wastes shall be transported by specially licensed carriers and disposed in a licensed facility. (d) Paints with toxic ingredients or solvents or lead-based paints will not be used. (e) Waste/used fluorescence lamps generated during renovation and construction will be disposed in a licensed facility.
C. Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and pedestrians by construction / refurbishment activities	(a) If refurbishment or renovation works are carried out in operational public buildings and access to these building are directed to other entrances of the buildings thereof, then necessary structures will be formed/constructed/installed considering universal access practices. (b) In compliance with national regulations the Contractor will ensure that the site is properly secured and construction/refurbishment related traffic regulated. This includes but is not limited to: 　▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible, and the public warned of all potential hazards 　▪ Traffic management system and staff training, especially for site access and near-site heavy traffic 　▪ Provision of safe passages and crossings for pedestrians where construction traffic interferes 　▪ Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement

PART 4: Monitoring Plan

Phase	What (Is the parameter to be monitored?)	Where (Is the parameter to be monitored?)	How (Is the parameter to be monitored?)	When (Define the frequency / or continuous?)	Why (Is the parameter being monitored?)	Cost (if not included in project budget)	Who (Is responsible for monitoring?)
During activity **preparation** (*pre-refurbishment)*							

Phase	What (Is the parameter to be monitored?)	Where (Is the parameter to be monitored?)	How (Is the parameter to be monitored?)	When (Define the frequency / or continuous?)	Why (Is the parameter being monitored?)	Cost (if not included in project budget)	Who (Is responsible for monitoring?)
During activity **implementation** (*refurbishment*)							

V. World Bank's Project Categorization

According to the World Bank's E&S Policy, projects are classified into one of four classifications as *High Risk*, *Substantial Risk*, *Moderate Risk* or *Low Risk* taking into account relevant potential risks and impacts, such as the type, location, sensitivity and scale of the project; the nature and magnitude of the potential E&S risks and impacts; the capacity and commitment of the Borrower; and other areas of risks that may be relevant to the delivery of E&S mitigation measures and outcomes.

A project is classified as *High Risk* after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

a. The project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment. This could be because of the complex nature of the project, the scale (large to very large) or the sensitivity of the location(s) of the project. This would take into account whether the potential risks and impacts associated with the Project have the majority or all of the following characteristics:
   (i) long term, permanent and/or irreversible (e.g., loss of major natural habitat or conversion of wetland), and impossible to avoid entirely due to the nature of the project;
   (ii) high in magnitude and/or in spatial extent (the geographical area or size of the population likely to be affected is large to very large);
   (iii) significant adverse cumulative impacts;
   (iv) significant adverse transboundary impacts; and
   (v) a high probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.).
b. The area likely to be affected is of high value and sensitivity, for example sensitive and valuable ecosystems and habitats (legally protected and internationally recognized areas of high biodiversity value), lands or rights of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and other vulnerable minorities, intensive or complex involuntary resettlement or land acquisition, impacts on cultural heritage or densely populated urban areas.
c. Some of the significant adverse ES risk and impacts of the project cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation, compensatory measures or technology, or sophisticated social analysis and implementation.
d. There are significant concerns that the adverse social impacts of the project, and the associated mitigation measures, may give rise to significant social conflict or harm or significant risks to human security.
e. There is a history of unrest in the area of the project or the sector, and there may be significant concerns regarding the activities of security forces.
f. The project is being developed in a legal or regulatory environment where there is significant uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex projects, or changes to applicable legislation are being made, or enforcement is weak.
g. The past experience of the Borrower and the implementing agencies in developing complex projects is limited, their track record regarding ES issues would present significant challenges or concerns given the nature of the project's potential risks and impacts.
h. There are significant concerns related to the capacity and commitment for, and track record of relevant Project parties, in relation to stakeholder engagement.
i. There are a number of factors outside the control of the Project that could have a significant impact on the ES performance and outcomes of the project.

A project is classified as *Substantial Risk* after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

a. the project may not be as complex as High Risk projects, its ES scale and impact may be smaller (large to medium) and the location may not be in such a highly sensitive area, and some risks and impacts may be significant. This would take into account whether the potential risks and impacts have the majority or all of the following characteristics:

    (i) they are mostly temporary, predictable and/or reversible, and the nature of the project does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required);

    (ii) there are concerns that the adverse social impacts of the project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm or risks to human security;

    (iii) they are medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large);

    (iv) the potential for cumulative and/or transboundary impacts may exist, but they are less severe and more readily avoided or mitigated than for High Risk projects; and

    (v) there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.), and there are known and reliable mechanisms available to prevent or minimize such incidents.

b. The effects of the project on areas of high value or sensitivity are expected to be lower than High Risk projects.

c. Mitigatory and/or compensatory measures may be designed more readily and be more reliable than those of High Risk projects.

d. The project is being developed in a legal or regulatory environment where there is uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex projects, or changes to applicable legislation are being made, or enforcement is weak.

e. The past experience of the Borrower and the implementing agencies in developing complex projects is limited in some respects, and their track record regarding ES issues suggests some concerns which can be readily addressed through implementation support.

f. There are some concerns over capacity and experience in managing stakeholder engagement but these could be readily addressed through implementation support.

A project is classified as *Moderate Risk* after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

a. the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. As such, the potential risks and impacts and issues are likely to have the following characteristics:

    (i) predictable and expected to be temporary and/or reversible;

    (ii) low in magnitude;

    (iii) site-specific, without likelihood of impacts beyond the actual footprint of the project; and

    (iv) low probability of serious adverse effects to human health and/or the environment (e.g., do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.).

b. The project's risks and impacts can be easily mitigated in a predictable manner.

A project is classified as *Low Risk* if its potential adverse risks to and impacts on human populations and/or the environment are likely to be minimal or negligible. These projects, with few or no adverse risks and impacts and issues, do not require further ES assessment following the initial screening.

Ministry of National Education

Directorate General of Innovation and Educational Technologies (DGIET)

SAFE SCHOOLING AND DISTANCE EDUCATION PROJECT (P173997)

Environmental and Social Management Framework Public Consultation Summary

Date: 19.01.2021

1. Introduction

Following the effectiveness of Safe Schooling and Distance Education Project on 11.09.2020, an "Environmental and Social Management Framework (ESMF)" including the relevant principles, rules, guidelines and processes for the assessment of the possible environmental and social risks and impacts in line with Environmental and Social Standards of the World Bank was prepared and published on Directorate General of Innovation and Educational Technologies, Ministry of National Education website on 19.10.2020.

The public consultation form was published on the website for gathering opinions and suggestions on the ESMF. A total of approximately 200 feedbacks from students (7), teachers (182), parents (4) and others (9) were collected until 09.11.2020. The feedbacks were included in this Public Consultation Summary.

In addition to the public consultation forms, Provincial Directorates of National Education and relevant Departments of the Ministry were officially requested to submit their opinions and suggestions on the ESMF until 01.11.2020.

The Public Consultation Summary prepared in consideration of the opinions and suggestions received from students, teachers, parents, Provincial Directorates of National Education and relevant Departments of the Ministry consists of 5 (five) sections:

   a) Opinions received via DGIET website;

   b) Opinions received from the Provincial Directorates of National Education;

   c) Opinions of the Departments of the Ministry;

   d) Opinions to be evaluated within the scope of Feasibility Study/Needs Analysis;

   e) Responses given by the relevant Departments of the Ministry to the opinions received via DGIET website.

2. Opinions received via DGIET Website

- Providing devices such as computers, tablets, etc. to teachers and especially to students with physical and/or mental disabilities in order for equal access to distance education,

- Troubleshooting internet access problems by strengthening the internet infrastructure in rural areas;

- Strengthening the internet infrastructure at schools so that services such as virtual classrooms can be provided;

- Establishing an IT infrastructure where E-Mesem-integrated distance education can be offered to students at Vocational Training Centers;

- Increasing the number of concurrent users served on EBA;

- Providing unlimited, free or low-cost internet service for distance education;

- Enriching and improving the course content on EBA;

- Preparing educational content for students who need special education that can be used by parents at home;

- Developing course content for students with mild mental disabilities at vocational high schools;

- Developing content (such as Turkish courses) for foreign students and/or students with different native language for supporting social cohesion;

- Enabling the access of foreign students to distance education;

- Providing devices and supporting the access of disadvantaged students to distance education;
- Providing in-service training to school staff on the platform where virtual classrooms will be offered and informing them about the possible software and system related problems.

3. **Opinions received from the Provincial Directorates of National Education**

- Offering concrete solutions for the access of disadvantaged students to devices and internet (social charities, philanthropists, nationwide campaigns, etc.);
- Carrying out a solid feasibility study with non-governmental organizations;
- Developing content for teacher training, parent guidance and community engagement activities;
- Carrying out guidance and briefing activities in order for the use of abstract learning environment by students consciously, by teachers effectively and by parents to raise their awareness;
- Evaluating and controlling the learning process taking place on the e-learning environment or within the blended education model in terms of pedagogical aspects;
- Nationwide extensification of the Educational Technologies Innovation Hub to be established in Ankara, and the Professional Learning Lab (PLL) within the Hub;
- Making use of the Techno parks in Universities throughout the process;
- Planning the in-service training activities which will provide teachers with the top-level use of technology skills and enable the use of distance education tools in an effective way;
- Preparing informative content for parents as well as students and teachers during the school closures and distance education due to the current Pandemic, and arranging online meetings;
- Re-organizing the legislation on the operation of educational activities;
- Organizing distance education activities within normal education hours so that they will not have a negative impact on the social lives of students and teachers;
- Design of the living spaces and environments in schools with the lowest level of risks by the experts of Occupational Health and Safety; (It is not within the scope of the Project but the Department of Occupational Health and Safety, Directorate General for Support Services.)
- Assigning healthcare staff to schools for students and teachers during the controlled opening of schools; (It is not within the scope of the Project.)
- Assigning supernumerary teachers or other staff to R&D Centers so that they could be integrated into the system. (It is not within the scope of the Project.)

4. **Opinions of the Departments of the Ministry**

4.1. General Directorate for Special Education and Guidance Services' Opinions

Under ESMF, October 2020, Section 3, Subsection ESS1: Assessment and Management of Environmental and Social Risks and Impacts (ESMF, pg. 14), following the statement;

(iii) Adaptation of digital educational program for special education: hearing impaired and visual impaired,

It is suggested to add;

"and removing the obstacles of communication between teachers and students during the process of distance learning by providing interactive infrastructure in accordance with the personal differences and learning styles of individuals who need special education."

In line with the suggestion, the relevant statement has been added.

4.2. General Directorate for Support Services' Opinions

Under ESMF, October 2020, Section 7 Institutional Arrangements and Capacity for ESMF Implementation (ESMF, pg. 26), the following the statement;

"DGIET will manage the project but will require support from other DGs, especially in the curricular, pedagogical and teacher development issues, as well as from DGs and programs providing specialized support (school counseling, education for migrants and in emergencies, etc.)" and

The statement (ESMF, pg. 27):

"The PIU will also ensure the followings:

- *the data center will be operated in line with both the Law on Occupational Health and Safety and its relevant regulations, and also the World Bank Group's EHS Guidelines"*

were assessed by the Directorate General and it is suggested to cooperate with the Department of Workplace Health and Safety Unit of Directorate General.

This suggestion was consulted with the Department officials on December 10, 2020.

Since the existing data centers are under the responsibility of service providers and integrators, the said Department does not have any responsibility in this context.

After the completion of the feasibility studies to be conducted on infrastructure design defined under Component 1.2, in the event of that the study outcome suggests establishment of a physical data center owned by MoNE, further evaluations will be carried out with the said Department.

The scope of cooperation with the Department for the renovation works of building rented for EdTech Innovation Hub has been determined as being in contact with the said Department and examining the OHS practices and measures for the renovation works together with the PIU in two-month periods.

5. Opinions to be Evaluated as a Result of the Feasibility Study/Needs Analysis

- Improving the digital literacy of students, teachers and parents for an effective use of distance education;
- Adding the curriculum-based content of guidance and psychological counseling to EBA;
- Improving the assessment and evaluation system;
- Following the attendance of students;
- Providing psychological and pedagogical support to disadvantaged students during both emergencies and normal times by means of receiving support from field experts and other relevant stakeholders;
- Tracking the achievement of target learning outcomes and behaviors by teachers and administrators;
- Restructuring the point-scoring system of EBA in order to eliminate the unrealistic statistics.

6. Responses given by the relevant Departments of the Ministry to the opinions received via DGIET website

Via the public consultation forms published on the website on 19.10.2020, a total of approximately 200 opinions and suggestions on ESMF were collected from students (7), teachers (182), parents (4) and others (9) until 09.11.2020.

Received opinions and suggestions were categorized and submitted on 21.12.2020 to the following departments of DGIET for them to provide a detailed information about their tasks.

(i) Department of Educational Informatics Systems;

(ii) Department of System Management;

(iii) Department of Educational Publications and Content Management;

(iv) Department of Educational Technologies and Technical Support Services.

Responses received from the Departments are given on the tables below:

OPINION	RESPONSE Department of Educational Informatics Systems
Providing teachers and students with devices such as computers, tablets, etc.	• There are ongoing works on providing tablets to 500.000 students during the distance education due to the current pandemic. • More than 14.000 EBA Support Centers were established for the use of teachers and students. • Students living in rural areas and having no access to EBA Support Centers are served by 164 mobile EBA Support Centers. • There are ongoing works on establishing IT labs in schools and transforming them into EBA Support Centers for distance education period.
Troubleshooting internet access problems by strengthening the internet infrastructure in rural areas	In order to provide broadband internet access to schools without cable internet in rural areas, 4.5G GSM and satellite internet services are provided.
Strengthening the internet infrastructure at schools so that services such as virtual classrooms can be provided	• 475.000 classrooms are equipped with interactive boards. • 15.000 schools are provided with network infrastructure. • 13.500 schools are provided with 50-100 Mb/s VPN Internet. • The procurement of 80.000 webcams are in process. The webcams will enable the operation of virtual classrooms by making use of interactive boards. Within the scope of the contract, 50.000 webcams are delivered to schools. • Network infrastructure cabling of 1.250 schools were completed in 2020. • In 2021, 5.000 more schools will undergo network infrastructure cabling and active component installation processes.
Providing unlimited, free or low-cost internet services	• Free internet service to be used on EBA is provided to all subscribers of operators with 4.5G GSM license. While Turkcell and Vodafone provide free internet up to 6 GB, Turk Telekom has increased the package to 8 GB. In addition, Pttcell, Teknosacell, Bimcell and Vestelcell subscribers are provided with free internet use up to 8 GB. • Internet service with 25 GB quota is provided on tablets that have been distributed to 500.000 students during the distance education period due to the current pandemic.

OPINION	RESPONSE Department of System Management
Establishing an IT system that is integrated into E-Mesem, on which distance education can be provided	The integration period started on 16.12.2020. Department of Information Technologies were informed about the web service needs for integration. Curriculum improvements were started by the Directorate General of Vocational and Technical Education. Following the receival of the web services, integration period will be completed.
Increasing the number of concurrent users served on EBA	In parallel with the infrastructure investments under Component 1.1 within the World Bank Project, the number of concurrent users were increased from 40.000 to 865.000 as a result of the platform improvements starting in March 2020. Besides, the number of concurrent virtual classrooms were increased from 50.000 to 250.000.
Enabling foreign students participate in distance education	E-School, Ministry's information management system is integrated into EBA. Therefore, all students registered on e-School can use EBA without any problems. It is also observed that foreign students can use EBA without any problems.

OPINION	RESPONSE Department of Educational Publications and Content Management
Enriching and improving the course content on EBA	One of the main components of the Project is about adding the content that are not present on EBA.
Preparing the educational content that can be used by parents for students in need of special education at home	• For students with special needs, content are provided under "Sana Özel" section on EBA for an inclusive education. • Adapted activity documents are prepared by the relevant departments and uploaded to the system. Interactive versions of these documents will also be uploaded to the system. The number of this kind of content will be increased within the scope of the Project.
Preparing educational content for students in need of special education	• Sign language interpretation is provided as an accessibility activity within the project. • Digital content production with audio description is planned for visually impaired students.
Developing course content for students with mild mental disabilities in vocational high schools	Prioritization based on the need analysis will be taken into consideration for content production/procurement.
Developing content (such as Turkish courses) for foreign students and/or students with another native language	Turkish course curriculum for foreign students was prepared by the Board of Education and published in December 2020. The relevant course will be identified on EBA platform. As a result, all content broadcasted on TRT EBA channels and language portal will be published on EBA course section.
Providing psychological and pedagogical support for disadvantaged students during both emergencies and normal times	Providing content for psychosocial support is included in the work plan.

OPINION	RESPONSE Department of Educational Technologies and Technical Support Services
Providing in-service training for school staff about the platform where virtual classrooms will be served, and informing them about the possible software and system related problems	It is planned to organize both face-to-face and online in-service trainings for administrators and teachers about the Virtual Classroom Platform. A Professional development training on "Distance Education with EBA" was prepared and offered to all teachers on 23.03.2020. The training included a section on virtual classrooms. Moreover, tutorials were created for the use of virtual classrooms and published on "How to?" section on EBA and YouTube channel.
Developing content for teacher training, parent guidance and community engagement activities	Training content will be developed for administrators and teachers within the distance in-service trainings. Besides, educational content to be developed is expected to include parent guidance and community engagement activities. Tutorials about distance education were created for parents and published on "How to?" section on EBA and YouTube channel.