

The Republic of Türkiye
Ministry of National Education

**Türkiye: Education for Job Market Readiness
Project (P510381)**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

DRAFT FOR NEGOTIATIONS
SEPTEMBER 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (the Borrower) will implement Türkiye: Education for Job Market Readiness Project (P510381) (the Project), with the involvement of the Ministry of National Education (MoNE) through its Directorate General for Innovation and Educational Technologies (DGIET), Directorate General for Vocational and Technical Education (DGVET), and Directorate General for Special Education and Guidance Services (DGSEGS) as set out in the Loan Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank), has agreed to provide financing for the Project, as set out in the Agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower's Representative specified in the Agreement or the Minister of National Education of the Ministry of National Education. The Borrower shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹			
A	ORGANIZATIONAL STRUCTURE a. Establish and maintain a Project Implementation Unit (PIU) within the Directorate General for Innovation and Educational Technologies (DGIET) with qualified staff and resources to support the management of environmental, social, health, and safety (ESHS) risks and impacts of the Project, including one Environmental Specialist and one Social Specialist, and secure the Occupational Health and Safety function through an external consultancy firm. b. Implement the Project under the leadership of the Directorate General for Innovation and Educational Technologies (DGIET), in close coordination with the Directorate General for Vocational and Technical Education (DGVET) and the Directorate General for Special Education and Guidance Services (DGSEGS). c. Procure and maintain a contract with an external OHS consultancy firm to deliver OHS services to the PIU, including risk assessment, incident reporting, training, and site inspections. d. Ensure that procurement documents and contracts include ESHS staffing requirements and require contractors to propose and contract respective ESHS staff prior to contract signing. e. Inspection and acceptance commissions, established within the three MoNE Directorates (DGIET, DGVET, and DGSEGS), carry out on-site inspections of rehabilitations and service works, verify ESHS compliance, report non-conformances, and recommend corrective actions.	The DGIET PIU, including at least one environmental, one social specialist, shall be established no later than 30 days after the Loan Effective Date and maintained throughout Project implementation. The contract with the OHS consultancy shall be signed, and the consultancy mobilized, no later than 30 days after the Loan Effective Date and maintained throughout Project implementation. Ensure that contractors appoint and mobilize their ESHS staff before site handover or commencement of works and maintain them throughout the contract duration. Inspection and acceptance commissions shall be designated/engaged prior to the commencement of any work and maintained for the duration of the relevant contracts.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS

¹ For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: • Training for PIU staff, consultants, and other involved parties on World Bank Environmental and Social Framework (ESF) and procurement procedures, relevant national environmental and social legislation, project specific instruments namely, ESMP and SEP; environmental and social assessments, and preparation and implementation of project and site-specific E&S instruments; monitoring and reporting of E&S aspects of the Project; stakeholder mapping and engagement; specific aspects of environmental and social assessment; community health and safety (including SEA/SH prevention measures); codes of conduct; other relevant topics, as needed • Training shall be delivered to Project workers on occupational health and safety (OHS) including on emergency prevention and preparedness and response arrangements to emergency situations, and diverse and respectful workplaces, free of sexual exploitation, abuse, or harassment (SEA/SH).	Capacity building plan to be prepared no later than 60 days after the Loan Effective Date Initial training, targeting PIU staff shall be provided no later than 90 days after formation of the PIU. Refresher training shall be provided at least once a year or as needed, during Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Bank regular quarterly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP, • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan, • Functioning of the Grievance Mechanism (GM) (i.e. complaints submitted to the GM, grievance log, and progress made in resolving them, etc.),	Submit reports to the Bank on a quarterly basis, within 30 days after the end of each reporting period, starting from the first calendar quarter following the Agreement's Effective Date and continuing throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	- E&S performance of contractors and subcontractors as reported through monthly contractors' reports, - Number and status of resolution of incidents accidents and non-compliances reported under Action E below, and. - Updates on the implementation of actions and mission recommendations within agreed timelines for actions specified in the mission Aide Memoires.		
D	CONTRACTORS' MONTHLY REPORTS Require contractors to provide monthly monitoring reports on E&S performance to the PIU in accordance with the metrics specified in the respective bidding documents and contracts. Submit such monthly reports to the Bank through the PIU.	Cause Contractor to submit first report to the PIU 30 days after the effective date of the contractors' contract and thereafter monthly throughout contract implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS
E	INCIDENTS AND ACCIDENTS Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS Implement the Project-Level ESMP for the project, consistent with the relevant ESSs. a. Customize the project level Environmental and Social Management Plan, obtain prior clearance from the Bank for at least five site-specific ESMPs, carry out consultations on these ESMPs, and ensure the finalized, consulted, and cleared versions are incorporated/annexed into the bidding documents. The proposed activities described in the exclusion list set out in the project-level ESMP shall be ineligible to receive financing under the Project. Require and cause the Contractors to prepare and implement site-specific Contractor Environmental and Social Management Plans (C-ESMPs), as set out in the project level ESMP. b. Require and cause the Contractors to prepare and implement site specific Contractor ESMPs (C-ESMPs), as set out in the Project level ESMP.	a. Implement Project-Level ESMP throughout the Project implementation. b. Prepare and submit to the Bank for prior clearance at least five site-specific ESMPs. Incorporate/annex the cleared and finalized ESMP(s) in the bidding documents for the respective investment(s) prior to the carrying out of the activity that requires the preparation of such ESMP(s). c. Contractors prepare and submit C ESMPs for PIU review and approval prior to site handover or start of works, then implement and update them throughout the contract.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS PIU shall be responsible and shall cause the Contractors to comply
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the Environmental and Social Management Plan (ESMP), and code of conduct into the E&S specifications of the procurement documents and contracts with contractors. Thereafter ensure that the contractors comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors and subcontractors to the Bank upon request. Cause and require Contractors to assign environmental, social and OHS focal points for managing E&S risks of investments by including this obligation into the bidding documents, as needed. Include, as part of the bidding documents (for selecting contractors), appropriate provisions for implementation of OHS related measures, including specific indicators and enforcement remedies. Upon request, provide copies of relevant contracts to the Bank.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Throughout Project implementation. As part of the preparation of procurement documents and respective contracts. Supervise throughout Project implementation. Upon request and throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS PIU shall be responsible and shall cause the Contractors to comply

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS PIU shall be responsible and shall cause the Contractors to comply
1.4	ASSOCIATED FACILITIES Ensure that the activities in any identified associated facilities are carried out in accordance with the applicable requirements of this ESCP and the ESSs, in consultation with and in a manner acceptable to the Bank. This includes, inter alia, the Project-Level ESMP, C-ESMP, SEP, POM, contractor management provisions, and other relevant instruments.	Throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS PIU shall be responsible and shall cause the Contractors to comply
1.	USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK The Project will not rely on the Borrower's Environmental and Social Framework (BESF) to manage the environmental and social risks and impacts. Instead, the Project will apply the World Bank's Environmental and Social Standards (ESSs) in full. The Borrower commits to notify the Bank of any changes in national legislation or procedures that may affect the E&S risk management of the Project.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES A standalone Labor Management Procedure will not be prepared. The provisions that must be adopted and implemented regarding workforce management are as follows: Ensure that Project Workers, as defined under ESS2, i.e. directly engaged by the Borrower or through third-parties to work specifically in relation to the project a (direct and contracted workers) will be hired, promoted and their employment, where	Adopt and disclose these procedures no later than 30 days after project effectiveness and thereafter implement throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS PIU shall be responsible and shall cause the Contractors to comply

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	needed, terminated based on following principles: (i) non-discrimination,(ii) equal opportunity, (iii) no-harassment, (iv) freedom of association; • Ensure that all Project Workers are provided with information and documentation that is clear and understandable regarding their terms and conditions of employment, their rights under national labor and employment laws (including payment of wages and deductions, periods of rest and leaving, working hours); • Ensure the adoption of appropriate occupational health and safety measures, in line with ESS2, at the work place (no matter their locations and including without limitation on field assignments), which shall consider inter alia an assessment of the potential OHS risks associated with the tasks to be carried out and include mitigation measures, such as protocols for protection against communicable diseases as issued by the Ministry of Health, Secretariat of Labor and Employment Inspection (under the Ministry of Economy), the State Secretariat of Health, WHO, and the World Bank; • Ensure the adoption of a Code of Conduct that sets out measures against practices related with sexual exploitation and abuse/sexual harassment (SEA/SH) in the workplace, including the dissemination of the referral services available in the country to respond to such behaviors; and • Prohibit and ban child labor as well as forced labor, per ESS2 requirements and applicable national laws.	As part of the quarterly reports mentioned in Section C , report on compliance with the labor management procedures throughout project implementation.	
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Prepare, adopt, and implement occupational, health and safety (OHS) measures as a part of the ESMP.	Prepared prior to the signing of the contracts and maintained throughout Project implementation.	DGIET PIU in collaboration with DGVET and DGSEGS
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a responsive Grievance Mechanism, as described in the SEP, to allow Project Workers under ESS2 to quickly inform management of labor issues and raise workplace concerns and labor-related matters without retaliation. This mechanism may use the same uptake channels of the project's overall GM but follow separate avenues	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MoNE through the DGIET PIU in collaboration with DGVET and DGSEGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	for the resolution of labor-related complaints and shall be further detailed in the Project Operations Manual. Report on the operation of the project workers GM.	As part of the quarterly reports mentioned in Section C, report on the operation of the project workers GM throughout project implementation.	
2.4.	PROJECT WORKERS TRAINING Implement training of Project Workers designed to heighten awareness of OHS risks and the requirement included in the labor management procedures in the ESCP (including workers' Code of Conduct). Require Contractor(s) to deliver training of contracted workers to raise awareness about their rights and obligations consistent with the labor management procedures in the ESCP.	At least once over the duration of the contract. Refresher trainings at least once a year or as needed, during Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS PIU shall be responsible and shall cause the Contractors to comply
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous waste, consistent with ESS3.	Prepare the WMP prior to the start of bidding for any works under the Project and implement it throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures (including dust, noise, waste management etc.) into the E&S instruments.	Prepared prior to the signing of the respective contracts and maintained throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks into the E&S instruments, including the ESMP, to ensure community health and safety during Project activities	Prepared prior to the signing of the respective contracts and maintained throughout Project implementation.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS
4.2	COMMUNITY HEALTH AND SAFETY	Same timeframe as for the preparation and implementation of the ESMPs.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	As part of the Project-Level ESMP, prepare, adopt, and implement measures to assess and manage specific risks and impacts to the community arising from Project activities that may generate from behavior of Project workers; risk of labor influx, Gender Based Violence (GBV)/ Sexual Exploitation and Abuse-Sexual Harassment (SEA-SH) risks, emergency situations, limitations on land, potential for community exposure to communicable diseases, dust and noise; and include these measures in site-specific ESMPs to be prepared in accordance with the Project-Level ESMP, in a manner acceptable to the Bank.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not currently relevant to the Project.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Not currently relevant to the Project.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This standard is not relevant as there are no Indigenous Peoples who meet the criteria under ESS7 in Türkiye.			
ESS 8: CULTURAL HERITAGE			
Not currently relevant to the Project.			
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
Not currently relevant to the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN a. The SEP has been prepared and disclosed. Implement the Stakeholder Engagement Plan (SEP) developed for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. b. Implement the Project SEP for each subproject throughout the life of the Project.	a. Implement the SEP throughout the implementation of the Project. b. Ensure that consultations and all relevant stakeholder engagement activities are conducted for each sub-project before the commencement of the bidding process.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS
10.2	PROJECT GRIEVANCE MECHANISM	Establish and operationalize not later than thirty (30) days after the Agreement Effective Date. Update as necessary and implement throughout the implementation of the Project. Existing PIU mechanisms will apply in the interim.	MoNE through DGIET PIU in collaboration with DGVET and DGSEGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Report quarterly through Project Progress Reports described in Action C .	
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: - Organizational structure established with qualified staff, including Environmental Specialist, Social Specialist, and Occupational Health and Safety function through an external consultancy firm. as described in Action A - Delivery of the trainings specified in Action B. - E&S assessments and plans to be prepared by the Borrower at the onset of Implementation as specified in Action 1.1. - Adaptation and disclosure of the labor management procedures no later than 30 days after project effectiveness as described in Section 2.1. - Establishment and operationalization of the project and workers' GM as specified Action 2.3 and Action 10.2.			