

**Belarusian National Platform**  
**Eastern Partnership Civil Society Forum**



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**Appeal**

Implementation of World Bank's *Belarus Higher Education Modernization Project - P167992*

Dear Mr. President,

The World Bank and the Ministry of Education of the Republic of Belarus are making preparations for implementation of the higher education modernization project in Belarus ("Belarus Higher Education Modernization Project - P167992", hereinafter the "Project") with the total financing of 109.01 million US dollars. The goal of the project is "to improve the teaching and learning environment and information on the labor market relevance of higher education". The Project components include: Modernization of the teaching and learning environment, Innovations in teaching and learning, Quality Assurance, Project management.

As the civil society representatives, we are writing this appeal during the pandemic when the Ministry of Education is acting irresponsibly refusing to introduce the national requirements for safe organization of the educational process and thus jeopardizing the health of students, teachers, and their families. Moreover, we witness repressions against those representatives of the academic community who urge to introduce quarantine measures during the pandemic.

We believe the above considerations provide a legitimate reason for revising the terms of extending the WB loan for the Project implementation in the Republic of Belarus.

The goal of the Project is to support the efforts of the Belarusian Government to improve the higher education in the Republic of Belarus, however, no goals related to the quality, accessibility or efficiency of the governmental funding of the higher education are mentioned in the Project. As the civil society representatives, we could interpret such a goal as supporting the Government without any obligations on its part.

In this regard, we would like to draw your attention to the persistent violations of the academic freedoms by the Ministry of Education: Belarus belongs to the penultimate group of countries with an index of academic freedom of 0.225 on a scale of 0 to 1. The project not only encourages the absence of clear indicators for ensuring the academic freedoms and institutional autonomy but also omits any governmental commitments in this area. Specifically, lack of this autonomy is now paralyzing numerous educational institutions and blocking quarantine decisions.

In addition, several risks associated with lack of transparency requirements and public control tools for the Project indicators implementation exist.

Thus, **Component 1: Modernization of the teaching and learning environment** involves modernization of HEIs infrastructure, facilities and resources as part of establishing a stable and accessible educational environment, however, it is not required to provide the funding on a competitive basis, transparently, and with public involvement. If distribution of the funds will be the responsibility of the officials, this will only increase the arbitrariness and corruption risks in the higher education system. Without public scrutiny, this



component of the project could be counterproductive for modernizing the higher education management system.

Despite the fact that, as part of Component 1, it is intended to establish a barrier-free learning environment - and this is virtually the only item of the project which addresses access to higher education issues, - we are concerned about such a narrow understanding of accessibility. In addition, it is not obvious whether it is planned to correlate this work with an increase in the share of persons with disabilities among students and teachers

We draw your attention to the fact that, so far, all measures to increase physical accessibility have not led to an improvement in the situation with actual availability of higher education for this group. The share of persons with disabilities among students tends to decline. Without a transition to quantitative goals of higher education accessibility policies, the learning environment can never be improved.

As the civil society representatives, we are extremely concerned that the social dimension of higher education and the fundamental values of the EHEA are not included in the project by any means. In Belarus, one of the most pressing issues is higher education accessibility decrease for vulnerable groups of the population. The issue of inclusion in our country is not limited to the needs of persons with disabilities and extends to access to higher education for persons with a low socio-economic status, the young rural population, orphans, and other minorities. Given that the fight against poverty is a priority of the World Bank, we would like to draw your attention to the fact that the poorly functioning social mobility in the country should not remain beyond the scope of this project. The PISA 2018 results and official statistics clearly indicate an increase in the social and cultural discrimination in higher education. However, none of the documents setting forth the educational policy in Belarus address the issue of access to education for the most vulnerable groups any longer. Unfortunately, the Project does not contribute to overcoming these deformations in the higher education development strategy.

The objective of **Component 2: Innovation in teaching and learning** is to increase the quality, relevance, and attractiveness of tertiary education through modernized programs with a focus on learning outcomes and curriculum reforms. But why do methodologies and HEIs faculty's training organization development with the aim of implementing some of the EHEA instruments not involve a prior reform of the laws and regulations without which these instruments cannot be implemented?

Lack of attention to the requirements for specific legislation changes has repeatedly led to the fact that the Ministry of Education has actually failed to comply with its commitments to implement the Bologna reforms. At the same time, lack of progress has been justified by the legislative reform unrealized (of the Education Code or related laws).

The objectives of **Component 3: Quality assurance** are i) to establish an independent and efficient mechanism for external quality assurance and ii) to strengthen intra-university quality assurance. The work under Subcomponent 3.1: External quality assurance will support the establishment of the National Quality Assurance Agency (BQAA) compatible with the European Standards and Guidelines on Quality Assurance (ESG-2015). Does the term *National Quality Assurance Agency* in the Republic of Belarus mean that it will be an independent agency as stated in the EHEA Roadmap?

The objective of **Component 4: Project management** is to support project management, monitoring and evaluation (M&E), and technical assistance (TA) to ensure efficient and effective management of the project implementation. Our concern is that involvement of civil society organizations in the project management, monitoring, and evaluation is not provided for. As evidenced by Belarus' compliance with the Roadmap for joining the EHEA requirements, participation of CSOs is a necessary element of the quality control of implementing recommendations and the minimum guarantee against an imitation of results. Since 2015, the Belarusian Independent Bologna Committee has prepared alternative reports on the Bologna reforms implementation which stress lack of transparency of the Ministry of Education's actions and numerous inconsistencies in the data.

In consideration of the above, we appeal to the World Bank to:

- *commence consultations on amendment and further implementation of the Project with civil society organizations and independent experts involved at an early date,*
- *implement clear requirements on the Project actions transparency and publicity,*
- *discontinue the project financing until it is amended to ensure improved access to high-quality higher education for vulnerable groups and implementation of the academic values*

Sincerely yours,

*EaP CSF Belarusian National Platform's Coordination Committee*

