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Brussels

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 student representatives of the European students, we are joining our voice to the student community in Belarus and Belarusian National Platform of EaP CSF and support this appeal during the pandemic when the Ministry of Education in Belarus 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, transparency, accessibility or efficiency of the governmental funding of the higher education are mentioned in the Project. This could be interpreted 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

ESU - The European Students' Union – is the umbrella organisation of 49 national unions of students from 39 countries, and through these members represents over 20 million students. The aim of ESU is to articulate and promote educational, social, economic and cultural interests of students at a European level towards all relevant bodies and in particular the European Union, Bologna Follow-Up Group, Council of Europe and UNESCO.



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.

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 the 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 2018¹ 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 project does not involve an objective of reforming the laws and regulations without which the EHEA instruments cannot be implemented, therefore we suggest to consider the importance of this aspect.

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 fact that new Education Code and related laws are designed in a better way but not yet enforces and therefore legislative reform unrealized; the same rhetoric since 2015.

We urge you also to consider the need of ensuring the independence of the *National Quality Assurance Agency* in the Republic of Belarus which is to be established as an outcome of this project.

Furthermore, we call on securing involvement of the civil society organizations in the project management, monitoring, and evaluation schemes. 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 data².

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 stage,***
- ***implement clear requirements on the Project actions transparency and publicity,***
- ***suspend 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,


Robert Napier
President

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¹ https://www.oecd.org/pisa/publications/PISA2018_CN_BLR.pdf, page 3 Equity related to socio-economic status

² <http://bolognaby.org/index.php/en/slider-home-ru-2/769-white-book-2018-belarusian-higher-education-european-perspectives-2>