



## **SUPPORT TO HARMONIZATION IN TURKEY PROJECT Stakeholder Engagement Plan**

**4 March 2021**

This project is financed jointly by the State and Peacebuilding Fund (SPF) and the Turkish Red Crescent (Kızılay). The SPF is a global multi-donor trust fund administered by the World Bank to finance critical development operations in situations of fragility, conflict, and violence. Over 260 grants and transfers have been approved in 61 countries for over US\$340 million. The SPF also supports global analysis, expert learning, and multi-stakeholder partnerships. The SPF is kindly supported by Australia, Denmark, France, Germany, The Netherlands, Norway, Sweden, Switzerland, The United Kingdom, as well as IBRD.

## REVISION HISTORY

Version Date	Remarks
4 March 2021	This version is approved by the World Bank for disclosure as updated SEP.
27 February 2021	Updated to include new stakeholders and COVID-19 specific measures to be taken in consultations.
29 October 2019	This version is approved by the World Bank for disclosure as draft SEP
12 October 2019	Shared with the World Bank for review and comments

## GLOSSARY

**Consultation:** The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

**Dialogue:** An exchange of views and opinions to explore different perspectives, needs and alternatives, with a view to fostering mutual understanding, trust and cooperation on a strategy or initiative.

**Host communities:** Refers to groups of people living in close proximity to a project that could potentially be impacted by a project. (“Stakeholders,” in contrast, refers to the broader group of people and organizations with an interest in the project.)

**Non-Government Organizations (NGOs)/Facilitating Partners:** Private organizations, often not-for-profit, that facilitate community development, local capacity building, advocacy, and environmental protection.

**Partnerships:** In the context of engagement, partnerships are defined as collaboration between people and organizations to achieve a common goal and often share resources and competencies, risks and benefits.

**Project:** Refers to Support to Harmonization in Turkey Project.

**Stakeholder:** Refers to individuals or groups who: (a) are affected or likely to be affected by the project (*project-affected parties*); and (b) may have an interest in the project (*other interested parties*). Stakeholders are defined *as people or entities that are affected or may have an interest in the Project*.

**Stakeholder engagement:** It is a continuous process used by the project to engage relevant stakeholders for a clear purpose to achieve accepted outcomes. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, stakeholder involvement in project monitoring, reporting to stakeholders and management functions.

## ABBREVIATIONS AND ACRONYMS

BSS	Beneficiary Satisfaction Survey
CRM	Turkish Red Crescent Complaints and Response Mechanism
DGMM	Directorate General for Migration Management
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FGD	Focus Group Discussion
FRIT	Facility for Refugees in Turkey
GRM	Grievance Redress
GRS	Grievance Redress Service
IOM	International Organization for Migration
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
PDM	Provincial Directorate of Migration
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PPM	Public Participatory Meeting
SEP	Stakeholder Engagement Plan
TAC	Temporary Accommodation Centers
TRC	Turkish Red Crescent
UNDP	United Nations Development Programme
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNWOMEN	The United Nations Entity for Gender Equality and the Empowerment of Women
WB	World Bank

## TABLE OF CONTENTS

1. INTRODUCTION.....	5
1.1. Context.....	5
1.2. About the Project.....	5
1.3. Purpose of the Stakeholder Engagement Plan .....	7
2. OVERVIEW OF NATIONAL LEGISLATION .....	8
2.1. National Legislation and Regulations.....	8
2.2. World Bank Environmental and Social Standard on Stakeholder Engagement ....	9
3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES.....	10
4. STAKEHOLDER IDENTIFICATION AND ANALYSIS .....	12
5. STAKEHOLDER ENGAGEMENT PLAN.....	16
5.1. Stakeholder Engagement Methods to be used .....	16
5.2. Overview of Stakeholder Engagement Plan .....	18
6. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT .....	21
6.1. Implementation Arrangements .....	21
6.2. Roles and Responsibilities.....	22
6.3. Information Disclosure .....	22
6.4. Monitoring and Reporting of the SEP .....	23
7. GRIEVANCE REDRESS MECHANISM .....	23
7.1. Overview of TRC Complaints and Response Mechanism .....	23
7.1. Who Can Submit Feedback or Complaint? .....	24
7.2. Channels and Methods.....	24
7.3. World Bank Grievance Redress System .....	26
ANNEX. TRC COMPLAINTS AND RESPONSE MECHANISM FORMS .....	27

## 1. INTRODUCTION

### 1.1. Context

1. Turkey is both a transit and reception country for migrants and refugees and hosts the highest number of refugees compared to other countries. Due to the crisis in its southern border with Syria, Turkey has been hosting an increasing number of refugees and foreigners seeking international protection. In addition to hosting more than 3.6 million Syrians under temporary protection, there are an estimated 400,000 asylum seekers and refugees from other nationalities. The international community has provided various funds (majority coming from EU) to assist Turkey's refugee response, in implementing a diverse range of programs and projects. These efforts have been geared primarily towards facilitating refugee access to basic services and economic opportunities, while strengthening the capacity and responsiveness of public institutions at the national and local levels. As of February 2021, more than 3.6 million Syrian refugees (98.4 percent) live among host communities whereas 58,242 refugees still remain in seven temporary accommodation centers (TACs) located in south-eastern provinces.<sup>1</sup> Between August 2018 and 2019, the government, in partnership with United Nations High Commissioner for Refugees (UNHCR), implemented the alternatives to camps program, which aimed at reducing the number of refugees in TACs. The government's policy is to provide accommodation for refugees who have special assistance needs.<sup>2</sup>

### 1.2. About the Project

2. The project development objective is to support the transition of refugees in target provinces in Turkey from TACs to community living. In broad terms, the project aims to support the transition of refugees in Turkey from TACs to community living; help them pursue their socio-economic inclusion in host communities through provision of information, counselling and referrals to basic services and economic opportunities. The project will also provide psycho-social support and contribute to social cohesion between refugees and host communities. Project beneficiaries will include some of the poorest refugees in provinces that are highly impacted by refugee presence in the country. The project will provide information, counselling and referral services and socio-economic empowerment support to refugees transitioning from camps to enhance their inclusion and readiness to live amongst communities in Turkey. The project will target camp-based refugees who are accommodated in TACs located in Adana (Sarıçam TAC), Hatay (Altınözü and Yayladağı TACs), Kahramanmaraş (Merkez TAC) and Kilis (Elbeyli TAC) and refugees who have recently relocated from TACs to communities. Based on project performance and implementation progress and availability of funds, the project will also be implemented in Osmaniye province. In addition, through social cohesion activities, the project will target other refugees and host community members.

**Table 1. Temporary Accommodation Centers and Refugee Population (At the time of approval)**

Province	TAC	Number of Refugees
Adana	Sarıçam	19,246
Hatay	Altınözü	2,677
Hatay	Yayladağı	4,334
Hatay	Apaydın	3085
Kahramanmaraş	Merkez	10,857
Kilis	Elbeyli	8,530

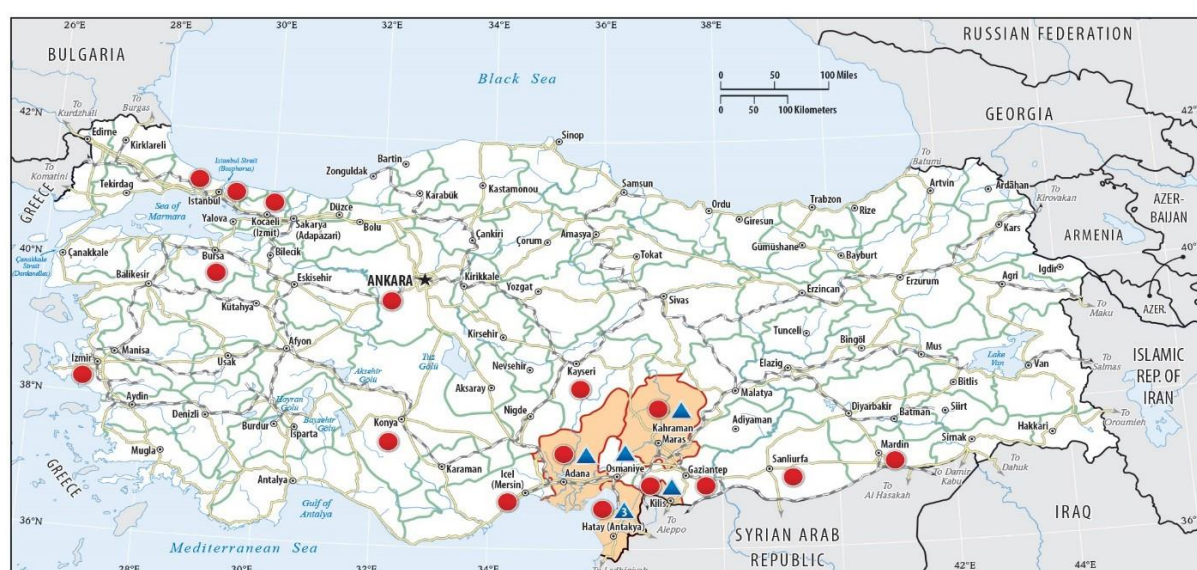
<sup>1</sup> Directorate General of Migration Management. 2019. Available at: <https://www.goc.gov.tr/gecici-koruma5638>

<sup>2</sup> Turkish Law defines people with needs as "unaccompanied minors, persons with disabilities, elderly, pregnant women, single parents with children, victims of torture, sexual assault or other forms of psychological, physical and sexual violence." Law no 6458, 2013: Law on Foreigners and International Protection.

Osmaniye <sup>3</sup>	Cevdetiye	13,255
-----------------------	-----------	--------

3. TACs were established as a short-term measure to help Syrians during their first admission phase to Turkey. Although the TACs have been successful in the short term (particularly given high quality of services and accommodation provided), it is recognized that camp settings can isolate refugees and prevent their inclusion in the society. To catalyze a development approach to forced displacement, the project will contribute to the socio-economic inclusion of refugees as they embark on life outside of camps in Turkey. The project will (i) improve refugees' readiness by enhancing their knowledge and awareness of life in Turkey through information and counseling services and (ii) referral to socio-economic empowerment support services, including Turkish courses, vocational and technical skills trainings, livelihoods support programs, and PSS. The project will also contribute to social cohesion through joint socio-cultural and sports activities.

**Figure 1. Project Map**



4. The project will be implemented through two components as presented in the table below:

**Table 2. Project Component Structure**

Project Development Objective	
The proposed development objective is to support the transition of refugees in target provinces in Turkey from temporary accommodation centers to community living.	
Component One: Support to Harmonization of Refugees and Host Communities	
Subcomponent	Activities
1a. Information, Counselling and Referral Services for Harmonization	<ul style="list-style-type: none"> <li>• Profiling and screening for support services</li> <li>• Case management and protection services for beneficiaries who require follow-up and continued support</li> <li>• Harmonization Program (comprehensive training / orientation program about cultural, social and economic life in Turkey)</li> <li>• Production of print and visual material for harmonization</li> <li>• Referrals to socio-economic empowerment support services (livelihoods, psycho-social, life/soft skills, etc.)</li> </ul>

<sup>3</sup> Cevdetiye TAC is not included in the initial phase of the project.

1b. Supporting Social Cohesion	<ul style="list-style-type: none"> <li>• Technology, intelligence and coding workshop</li> <li>• Role model activities</li> <li>• Mobile theatre</li> <li>• Social, sports and cultural activities</li> </ul>
Component Two: Project Management	
<ul style="list-style-type: none"> <li>• Project Management</li> <li>• Monitoring and Evaluation (M&amp;E)</li> <li>• Communications</li> </ul>	

5. Given that relocation to communities is voluntarily and DGMM approves departures on a first-come-first-serve basis, it is not possible to estimate the number of departures from TACs. The preliminary assessments and consultations with refugees and key stakeholders indicate that the decision for relocation is based on several factors such as availability of cash assistance, prospects for jobs, economic opportunities, and family and social connections in the desired province of relocation. The project will have a flexible implementation and beneficiary targeting design in order to adjust to irregular departures from TACs and to ensure the planned support services are delivered.

6. The table below shows project contingency plan to respond to various scenarios:

**Table 3. Project Contingency Implementation and Beneficiary Targeting Plan**

	Scenario	Primary Target Beneficiary Group
1	Refugee departures from TACs are in line with projections	The project will target refugees who have applied and processed for relocation to communities during project implementation.
2	Refugee departures are significantly higher than projections	DGMM will process applications on a first-come, first served basis. Implementation of project activities will be undertaken as per the capacity of TRC Community Centers and project staff. Some project activities may be implemented in a condensed / adjusted manner (i.e. duration of trainings, session hours, class size, etc.).
3	Refugee departures from TACs are irregular	The project will target (i) refugees who have applied and processed for relocation after project effectiveness and (ii) other refugees who have relocated to communities during calendar year 2019.
4	No or insignificant number refugee departures from TACs	The project will target refugees who have relocated to communities in since August 2018 and other refugees who are interested in participating in harmonization program.

7. As a result of the Covid-19 disease preventive measures, leaving from TACs was prohibited except for necessary conditions. Therefore, the project has been implemented according to the fourth scenario.

### **1.3. Purpose of the Stakeholder Engagement Plan**

8. The purpose of this Stakeholder Engagement Plan (SEP) is to define the stakeholder engagement strategy of Turkish Red Crescent (TRC) throughout the course of the project.

9. The plan seeks to identify methods and tools that will be used as part of the engagement approach; as well as to summarize previous engagement activities carried out and to define the roles and responsibilities of TRC in engaging with its stakeholders for the implementation of the actions outlined in this plan. The SEP will allow to assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and



environmental and social performance. The objectives of the SEP are to:

- Identify stakeholders who are indirectly or directly affected by and/or interested in the project;
- Outline modalities for information dissemination and stakeholder engagement activities, including their purpose, frequency and location during project preparation and implementation.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life on issues that could potentially create an impact;
- Define the roles and responsibilities of different actors to implement and monitor these activities;
- Elaborate on the blueprint for a functional grievance redress/beneficiary feedback mechanism and provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow TRC to respond to and manage such grievances;
- Ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format; and
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life on issues that could potentially create an impact.

## 2. OVERVIEW OF NATIONAL LEGISLATION

### 2.1. National Legislation and Regulations

10. This section summarizes national legal and regulatory requirements that are relevant for the purposes and scope of this SEP.

***Box 1. Right of petition, Right to Information and Appeal to the Ombudsperson (Constitution, Article 74)***

“Citizens and foreign resident in Turkey, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Turkey with regard to the requests and complaints concerning themselves or the public. The result of the application concerning himself/herself shall be made known to the petitioner in writing without delay. Everyone has the right to obtain information and appeal to the Ombudsperson. The Institution of the Ombudsperson established under the Grand National Assembly of Turkey examines complaints on the functioning of the administration<sup>1</sup>.”

**Box 2. Right to Constitutional Complaint (Constitution, Article 148)**

“Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities. In order to make an application, ordinary legal remedies must be exhausted.”<sup>1</sup>

“Article 24, Appeal process - The applicant whose request for information was rejected may appeal to the Board within fifteen days starting from the official notification before appealing for judicial review. Appeals should be written. The Board shall render a decision within 30 days.”

**Box 3. Law on the Right to Information (Articles 11 and 24)**

“Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days.”

**Box 4. The Environmental Impact Assessment Regulation No. 29186 (Article 1)**

- 1) In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting (PPM) will be accomplished on the date given by Ministry and Ministry qualification given institution/organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.
  - (a) The competency issued institutions/organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.
  - (b) Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.
- 2) Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.
- 3) Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.
- 4) The competency issued institutions/organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the PPM.

**2.2. World Bank Environmental and Social Standard on Stakeholder Engagement**

11. The World Bank’s Environmental and Social Framework (ESF)’s Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice” (World Bank, 2017: 97). Specifically, the

requirements of ESS10 are:

- “Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

12. This standard requires that an SEP that is proportionate to the nature and scale of the project and its potential risks and impacts is developed by the Borrower, that it is disclosed as early as possible before project appraisal, and that the Borrower seeks the views of stakeholders on the SEP, including on the identification of stakeholders and proposals for future engagement. An updated SEP needs to be disclosed by the Borrower subsequent to any significant changes to the original version (World Bank, 2017: 99). In addition, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.<sup>4-5</sup>

### **3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES**

13. Stakeholder consultations were carried out as part of project preparation. The initial stakeholder engagement meetings took place in Ankara between December 2018 and June 2019. These were mainly about understanding the information and counselling needs of refugees and the programs implemented by various national agencies and international organizations.

- (a) Between December 2018 and February 2019, consultations were undertaken with DGMM, Union of Municipalities of Turkey, TRC, Chambers and Commodity Exchanges of Turkey, Association for Solidarity with Asylum Seekers and Migrants (ASAM), and Delegation of the European Union (EUD). These consultations covered: (i) informing on the project timeline and critical milestones, (ii) understanding the government’s strategies and priorities for the project, (iii) informing on the World Bank’s support in technical assistance, (iv) discussion of social cohesion aspects of the national harmonization strategy, and (v) learning on TRC’s socio- economic development programs for refugee and host communities implemented via

---

<sup>4</sup> Details for the WB Environmental and Social Standards are available at: [www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards](http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards) and <http://projects-beta.vsemirnyjbank.org/ru/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

TRC Community Centers.

- (b) Between July and August 2019, consultations were undertaken with various UN agencies, including International Organization for Migration (IOM), UNHCR, the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women), United Nations Population Fund (UNFPA), and United Nations Development Programme (UNDP). These consultations covered learning about experiences and knowledge sharing on harmonization activities implemented or supported by various agencies on the ground. The main take from these consultations were (i) there is a general risk of misinformation about support and services provided to refugees, despite government and UN efforts to provide accurate and reliable information and (ii) communicating the project to refugees should be done sensitively and a project-specific communications protocol should be developed.
- (c) In July and September 2019, provincial level consultations were undertaken with Provincial Directorates of Migration (PDM), Development Agencies in Hatay and Adana, TRC Community Centers in Adana and Kahramanmaraş, and management and technical staff from TACs in Adana, Hatay Kahramanmaraş, and Osmaniye. Focus group discussions (FGD) were held in TACs in Adana and Kahramanmaraş with refugees and attended by a total of 22 refugees. Beneficiary consultations with refugee women were held in Gaziantep and Osmaniye during the preparation meetings of another FRIT -2 project, namely Social Entrepreneurship, Empowerment and Cohesion Project, which is under preparation. Additional FGDs are planned during October 2019 with women refugees in Kahramanmaraş (10 October) and Adana (24 October) both in the community centers and TACs.

14. Consultations with stakeholders in Ankara and target province revealed common challenges/risks that are faced by refugees, including those who have resettled from camps recently. These include risks faced by refugee women, including gender-based violence and economic abuse. Women generally consider access to housing, inability to speak in Turkish, and finding employment to be their biggest challenges. Further, women and youth from both refugees and host communities are disadvantaged with regard to access to livelihood and job opportunities. Regarding information, counseling and referral mechanisms, stakeholders indicate that there is a general lack of coordination in terms of provision of these services. Stakeholders noted that there is a need to provide accurate information and counselling to reduce refugee susceptibility to fraud and economic abuse and improve access to work, schools, housing, and services. As such, it was noted by various stakeholders that provision of information, counseling and referral services should cater to the specific needs of sub- groups. Further, consultations highlighted that links should be established with mainstream services in the provinces and districts for refugee households to access once they depart from TACs. Access to education is a key concern for refugee children transitioning from TACs to community living.

13. Beneficiary consultations (FGDs) reveal that main challenges faced by refugees who resettle to communities include: (i) lack of sufficient information on available support services outside of TACs, (ii) finding affordable housing, (iii) registering children to school, (iv) pursuing economic opportunities, (v) falling victim to fraud and financial abuse while searching for housing and jobs, (vi) lack of basic life and social skills in the context of Turkish society, and (vii) increasing discrimination and negative perceptions about refugees. It was also noted during FGDs that most refugees who have recently resettled in communities face challenges in navigating themselves in the communities.

Consultations also revealed that cash assistance provided by UNHCR under the alternatives to camps program was an important incentive that encouraged refugee relocation.

#### Box5: Knowledge, Attitudes and Practices (KAP) Assessment on COVID-19

To understand communities' knowledge, attitudes, and practices (KAP), along with their information needs on COVID-19, this KAP assessment was conducted by the Turkish Red Crescent Society (TRCS) under the Community Based Migration Programme (CBMP) from 10 to 26 November 2020. This assessment was conducted using the same methodology as before - via phone interviews and online consultations/focus group discussions (FGDs) with refugees and local people in 16 TRCS Community Centre locations. Comprising both qualitative and quantitative data, a total of 3,840 individuals had been interviewed over the phone in 16 Community Centre locations, with a total of 321 refugees and local people participating in 32 FGDs.

Survey findings show that community members are well aware (96.1%) of the COVID-19 outbreak, including the symptoms of the infection, how it spreads, and how to reduce the risks of becoming infected. The most popular sources of information about COVID-19 were TV (59.9%), followed by Ministry of Health (30.2%), Facebook (30.2%), websites (22.0%), family and friends (38.9%) and health workers (15%). Communities' most trusted sources of information were Ministry of Health (43.2%), TV (38.6%), doctors (19.0%) and health workers (18.7%). A majority of respondents identified older people (84.7%) and people with chronic diseases (67.4%) as being at the highest risk of COVID-19 infection. When asked if a person who is infected or has recovered from COVID-19 would face discrimination, 14.9% of the host population answered "Yes" compared to 5.3% of the refugee respondents. This suggests that stigmatisation of COVID-19 is higher amongst the host population than in refugee communities.

Vast majority - 95.8% - of survey respondents were taking some measures in their daily life to prevent the risk of COVID-19 infection, including frequently washing hands with soap, practicing personal hygiene, avoiding going out unless necessary, wearing masks, and maintaining physical distance whenever outside. Although around 54.7% of the respondents reported not needing any more information about COVID-19, the remaining 45.3% requested information on various topics on COVID-19. Refugees were significantly more likely to follow TRCS social media channels or visit the TRCS website and recognise these as a source of COVID-19 information, than respondents drawn from the local host community, many of whom said they were unaware of these TRCS platforms.

Ten months into the pandemic, there are still many people who have lost employment and respondents suggested if TRCS could provide assistance to those who have become unemployed. At the same time, the need for masks, hygiene kits and psychosocial support (PSS) in the community remains high. Relevant services including distribution of masks and hygiene kits, mental health support as well as dissemination of COVID-19 information to people in ways that tackle and overcome the increasing fatigue, and online activities for children, were increasingly requested from TRCS to help communities respond to the COVID-19 outbreak.

Table 4. Summary of Consultations

Location	Date	Participants	Key Points of Discussion
<b>Government</b>			
Ankara	December 2018-August 2019	DGMM	<ul style="list-style-type: none"> <li>• Understanding Turkey's national harmonization strategy and government's plans with regards to TACs</li> <li>• Discussion on social cohesion aspects of the national harmonization strategy</li> <li>• Informing on the project preparation and implementation timeline and milestones</li> <li>• Discussion on the implementation arrangements</li> <li>• Informing on the World Bank's support in technical assistance to DGMM</li> </ul>
Osmaniye	July 2019	Cevdetiye TAC	<ul style="list-style-type: none"> <li>• Understanding information and socio-economic inclusion support needs and economic opportunities of the TAC-based refugee population who would be from TACs to communities</li> <li>• Collecting feedback from local stakeholders on the project approach</li> </ul>
Hatay	July 2019	Local Governor of Altınözü District, Altınözü TAC, Eastern Mediterranean Development Agency	
Adana	August 2019	Sarıçam TAC	
Kahramanmaraş		Deputy Governor of Kahramanmaraş Province, PDM, Merkez TAC	
<b>Development Partners</b>			
Ankara	February 2019	FRIT Coordination Office, Delegation of the European Union to Turkey	<ul style="list-style-type: none"> <li>• Understanding EU IPA priorities in the area of harmonization</li> </ul>
Ankara	February-August 2019	UNHCR	<ul style="list-style-type: none"> <li>• Learning experiences on transition of TAC refugees to communities</li> </ul>

			<ul style="list-style-type: none"> <li>• Understanding the implementation and experience of the ‘alternative to camps program’, through which UNHCR provided cash assistance to refugees</li> <li>• Discussions on establishment of coordination mechanism with UNHCR during project implementation</li> </ul>
Ankara	July 2019	UNDP, UNFPA, IOM, UNWOMEN	<ul style="list-style-type: none"> <li>• Learning experiences and knowledge sharing on projects of partners providing socio-economic support to refugees in project target provinces</li> </ul>
Ankara	February 2019	ASAM	<ul style="list-style-type: none"> <li>• Learning on ASAM’s socio-economic support services provided at the multi-service centers</li> </ul>
Ankara	July-September 2019	TRC Community-based Migration Programs	<ul style="list-style-type: none"> <li>• Learning on TRC’s socio-economic support services provided at the community centers</li> </ul>
Adana	August 2019	TRC Community Center	<ul style="list-style-type: none"> <li>• Understanding the implementation and functions of TRC’s grievance and complaints mechanism</li> </ul>
Kahramanmaraş		TRC Community Center	

#### 4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

16. A key element of any SEP is effective identification of key stakeholders. Stakeholders are defined as individuals or groups who can affect, are affected by, or have a legitimate interest in the Project. For the purpose of the SEP:

- (a) *Project-affected parties (PAPs)* includes “those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.”<sup>6</sup> They are the individuals or households most likely to observe changes from social impacts of the project.
- (b) *Other interested parties (OIPs)* refers to “individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest.”<sup>7</sup> For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups

<sup>6</sup> World Bank. 2016. “World Bank Environmental and Social Framework.” World Bank, Washington, DC.

<sup>7</sup> Ibid

17. Project affected parties and level of impact are described in the table below.

Table 5. Project-affected Parties

Stakeholder	Description	Issues/Interaction	Significance Level – Interest	Significance Level – Influence
Refugees in TACs and refugees who recently relocated to communities	<p>Directly benefitting from project activities (targeted population). The beneficiaries are: (i) refugees willingly applying for relocation from TACs to communities; (ii) refugees who have recently relocated to communities; and (iii) refugees who are not planning to leave TACs but participating in project activities in TACs.</p>	<p>Refugees who will be moving from TACs to communities are not aware of administrative requirements, their rights and duties, and social, cultural and economic life in Turkey. Refugees obtain information only from their relatives and friends who live in communities or who have recently resettled in communities.</p> <p>Refugees want to learn daily practices in Turkey’s social, cultural and economic life to improve their inclusion in Turkish communities and make their lives easier.</p>	High	High
Women Refugees	<p>Women who left TACs</p> <p>Women having no/limited social interaction with other refugees and host community members</p> <p>Women have limited knowledge on social, cultural, and economic practices in Turkey</p> <p>Women who are mostly under protection support, ESSN beneficiary.</p> <p>Women having necessary skills; but not having opportunity to establish</p>	<p>Women are highly hesitant about working outside their homes. This group of women are more in need of protection support. They feel more secure when they work at home. Women have low level of interaction and relationship with others. They generally interact only with their relatives.</p>	High	High



	home-based businesses and/or other livelihoods activities.			
Children Refugees	Children whose parents left TACs, needing support on registration to orientation for new schools  Children receiving Conditional Cash Transfer for Education Programme in Turkey	Children will face challenges in adjusting to a new urban environment  Children may have difficulties in adapting to the new urban environment, which may lead to increases in drop-outs or non-attendance.  Child labor (to support family income or inability to afford schooling) may result in children not registering to school.	Medium	Medium
Vulnerable groups	Turkish Law defines people with needs as unaccompanied minors, persons with disabilities, elderly, pregnant women, single parents (male or female) with children, victims of torture, sexual assault or other forms of psychological, physical and sexual violence. Vulnerable groups in the scope of this project cover those who meet the above-mentioned definition.	Government's policy is to offer accommodation to refugees who have special assistance needs and refugees who meet this category are encouraged to stay in TAC as specialized services are provided in TACs. Consultations reveal that refugees with special needs prefer TAC to community living. As a result of the Covid 19 pandemic preventive measures leaving TACs is prohibited except necessary conditions. Therefore, the project will target SuTP who already left TACs.	Medium	Low
Host community members who are project beneficiaries	Host community members who receive benefits from the project	The project will reach an equal number of host community members in activities that are relevant to the needs of host community members	Medium	Low
Other refugees	Refugees who were never accommodated in camps	Other refugees may also benefit from the activities offered by the project.	Medium	Low
Host community members	Host community members in refugee hosting neighborhoods with high refugee population density, Host community members in refugee hosting neighbors where refugees from TACs resettle	Host Community members feel discriminated when refugees receive cash assistance, humanitarian support and various support services by the NGOs and/or government based on the perception that they face similar socio- economic difficulties but	High	Low

		have no access to such support		
TAC Muhtars	Refugee muhtars in TACs are well aware of challenges and risks	TAC Muhtars have access to vulnerable groups in the TACs. The project will receive latest trends on camp life through engagement with muhtars. Since project activities will not cover TACs, TAC Muhtars will be consulted as a source of information on the experiences of SuTPs who left TACs.	Low	Medium
Muhtars	Muhtars in refugee hosting neighborhoods are well aware of challenges and risks	TAC Muhtars have access to refugees in the TACs. The project will interact with TAC muhtars.	Medium	Medium
Beneficiaries of TRC Community Centers	Existing beneficiaries of the TRC Community Centers	Beneficiaries participating in various services provided by TRC Community Centers will be linked with project beneficiaries through social cohesion activities and other Community Centers activities.	Low	Low
DGMM	DGMM is responsible for ensuring refugee inclusion program is in alignment with the national harmonization strategy and action plan. DGMM is also responsible for TAC management.	DGMM will lead project steering meetings which will take place monthly. DGMM will also approve project work plan.	High	High
PDMs	Directorate General of Migration Management (DGMM) through PDMs is responsible for TACs, including review/approval of relocation applications and benefits	PDM will be informed on a regular basis for operational issues.	High	High
Directorate General of State Theaters	DCST is responsible of ensuring that Turkish Performing Arts is developed, spread and promoted at home and abroad as well as increasing the general	DCTS will act as a consultant for mobile theater, script, decoration and actors/actresses.  DCTS provides support for script preparation, determination of actors, preparation of mobile	High	High

	education, language and culture of the people with local and foreign works.	vehicle and performing theatre in related provinces.		
--	-----------------------------------------------------------------------------	------------------------------------------------------	--	--

18. The OIPs who are likely to be individuals, groups, or organizations with an interest in the project, due to the project location, its characteristics, its impacts, or matters related to public interest may include government officials, the private sector, universities, labor unions, women’s organizations, other civil society organizations, and cultural groups. OIPs of the project are described in the Table below according to their level of impact.

Table 6. Other Interested Parties

Municipalities	Some municipalities operate service/advisory centers to support refugee inclusion	The project will coordinate with available municipality-run refugee support centers to link beneficiaries who need additional support.	Medium	Medium
UNHCR	UNHCR provided cash assistance to refugees who resettled from TACS to communities between August 2018 and 2019.	The project will coordinate with UNCHR regularly.	Medium	Medium
Development Partners	ILO, IOM, UNDP, UNFPA, UNICEF provide various services and implement projects targeting refugees. EU provides financing support to refugee inclusion projects implemented by various government agencies.	The project will coordinate with development partners through existing coordination mechanisms.	Medium	Low

TRC Child Programme	TRC Child Programme: TRC has Child and Youth Friendly spaces in TACs	TRC Child Programme will support project activities as discussed in the Project Implementation Manual (PIM). TRC Child Programme will be sensitized about the project including the provisions of the PIM.  The project will have benefit from beneficiary network of the TRC Child Programme inside TAC.	Low	Low
Service provider NGOs	Local and international NGOs providing services such as vocational and technical skills training, entrepreneurship support, employment support, psycho-social support, etc.	The project (through TRC Community Centers) will refer beneficiaries requiring specific special needs, which are not covered or fully covered by TRC Community Centers, to other service provider where applicable.	Low	Low

19. There are other interested parties who will be future stakeholders that are considered under the category *Future Other-Interested Parties* (Future OIP). These stakeholders are related to other WB/Facility for Refugees in Turkey (FRIT)-financed projects.

20. Table showing potential future stakeholders is provided below

Table 7. Future Other Interested Parties

Stakeholder	Description	Key Role	Significance Level - Interest	Significance Level - Influence
Turkish Employment Agency (İŞKUR)	İŞKUR will implement a new project that has a component on profiling and matching eligible refugees and Turkish citizens with the potential employers	Beneficiaries of the project might be referred to various projects. Implementing entities of various projects may include project beneficiaries in their activities.	Low	Low
Agricultural Credit Cooperatives (ACC-TKK)	The ACC will implement a project for agricultural development. Project includes matching host community and refugee and Turkish citizens with agriculture labor and employers.			

Development Agencies	The DAs will implement the Social Entrepreneurship, Empowerment and Cohesion in Refugee and Host Communities Project includes provision of capacity building and subgrants to select refugee and host communities.			
----------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	--

According to data of D.G.M.M. (as of 24.02.2021) there are 58.242 Syrians living in seven Temporary Accommodation Centres (TACs), which are located in Adana, Kilis, Kahramanmaraş, Hatay and Osmaniye. With the beginning of Covid-19, governments all around the world has started to imply preventive measures that limits human mobility. As part of Covid-19 measures in Turkey, entries and exists to TACs were suspended except for necessary circumstances. In line with this preventative measure, government’s policy of closing TACs is also postponed. Since, the goal of the project is re-adapting SuTP to urban life who left TACs, many activities are interrupted by the Covid-19 pandemic conditions. Under these circumstances, in order to facilitate the World Bank trust fund, it is decided to transform this project into a Social Cohesion project in which activities will be focused more on the social cohesion processes of people who already left TACs as well as other refugee groups and host communities.

## 5. STAKEHOLDER ENGAGEMENT PLAN

### 5.1. Stakeholder Engagement Methods to be used

21. The following methods will be used for the implementation of the SEP:

- (a) *Consultation Meetings.* Consultation meetings will be convened with stakeholders including PDMs, municipal authorities, provincial directorates of line ministries, universities, chambers of commerce, etc. In addition, consultation meetings will be held with stakeholders who are directly affected by the project on a regular basis at each stage of the project. Consultations will be conducted in Turkish or Arabic depending on the stakeholders engaged. In order to facilitate Covid-19 preventative measures rather than face-to-face meetings, the project will consult with stakeholders via online meetings as well as email, teleconference and videoconference, when needed.
- (b) *Beneficiary Satisfaction Survey and FGDs* examining beneficiary experience and feedback about project activities. TRC will undertake the survey and FGDs twice during the project’s lifecycle: once around the mid-implementation phase, and once towards the end of the project’s

implementation.

- (c) *Information Desks.* TRC Community Centers provide information via local residents with information on stakeholder engagement and project activities. Communication materials will be readily available at TRC Community Centers in Turkish and Arabic.
- (d) *Communication Materials.* Written information in Turkish and Arabic will be disclosed to the public via a variety of communication materials including leaflets, posters, hand-outs, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. TRC Community Centers website will also provide information about the project. A project brochure will be prepared and presented to the stakeholders providing general information about the project, as well as information about grievance mechanism and liaison/feedback channels will be provided. In addition, informative leaflets on social cohesion trainings will be prepared and distributed to the beneficiaries at the beginning of trainings
- (e) *Social Media.* Social media accounts<sup>8</sup> of Community Centers are available in various social media platforms. Community Center social media accounts are managed by a team of social media experts and regularly updated. The posts cover services provided in community centers, stories of beneficiaries and contributions of partners. Social media channels will be utilized during the implementation of this project, including for stakeholder engagement.
- (f) *Grievance Mechanism.* TRC's existing grievance mechanism, called the Complaints and Response Mechanism (CRM) is found to be adequate and in compliance with the World Bank's ESS10 Stakeholder Engagement and Information Disclosure standard. In addition, at the end of social cohesion trainings a form, which gets feedback on the project activities, will be distributed to the project beneficiaries. These forms will be collected and consolidated. The consolidated feedback will be converted into a report format and submitted to the World Bank. Therefore, TRC will implement its existing grievance and complaints mechanism for the project mechanisms will utilize kiosks, complaint boxes and other methods. These are described in Section 7 of the SEP.

22. Special attention will be paid to vulnerable groups and their possible difficulties in accessing stakeholder engagement activities and utilization of above-mentioned methods. The Project will engage vulnerable groups (i.e. people with disabilities, elderly people, women, youth, etc.) in areas of their comfort (i.e. TRC will undertake engagement activities with this group at their homes or preferred locations, deliver engagement activities via specialists who have training on engaging with vulnerable groups, etc.). As a humanitarian organization, TRC facilities provide necessary resources for engagement of vulnerable groups. In addition, TRC staff are trained and

sensitized in working with vulnerable people. All arrangements will be made to make vulnerable people comfortable and feel free to express themselves. There might be a need to use sign language or other mechanisms depending on types of vulnerability stakeholders have.

23. Project stakeholders will be kept informed on project's social performance, implementation of the SEP and the grievance mechanism through quarterly progress reports and regular feedback

Consultation meetings conducted by TRC Community Centers. Within the framework of Covid-19 measures consultation meetings will be conducted through online platforms. Reporting will be undertaken quarterly as part of quarterly reports and other available means utilized by TRC Community Centers.

---

<sup>8</sup> Community Center social media accounts can be reached at the user name @Kizilay

## 5.2. Overview of Stakeholder Engagement Plan

Subgroup	Project Phase	Engagement Mechanism	Communication Channels & Materials	Purpose	Venue	Frequency	Responsible Party
PAP							
Refugees who recently relocated to communities Women refugees	Preparation, implementation, completion	Consultation meetings, focus group discussions, implementation support and M&E visits, BSS, GRM.	Kiosks, complaints box, social media, leaflets, posters, brochures, hand-outs. Relevant materials will be available in Arabic.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	TRC Community Centers	Daily, Weekly, Monthly	TRC PIU in partnership with PDMs
Children refugees	Preparation, implementation, completion	Consultation meetings, focus group discussions, implementation support and M&E visits, BSS, GRM.	Kiosks, complaints box, social media, leaflets, posters, brochures, hand-outs. Relevant materials will be available in Arabic.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	TRC Community Centers	Daily, Weekly, Monthly	TRC PIU, in partnership with PDM and TRC Child Programme



Vulnerable refugees	Preparation, implementation, completion	Consultation meetings, focus group discussions, implementation support and M&E visits, BSS, GRM.	Kiosks, complaints box, social media, leaflets, posters, brochures, hand-outs. Relevant materials will be available in Arabic. Community Centers have accessibility features to ensure participation of vulnerable groups. In addition, Community Centers have specialized staff that will ensure, when needed, implementation of separate Mechanisms for consultation and grievances.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	TRC Community Centers	Daily, Weekly, Monthly	TRC PIU in partnership with PDMs
---------------------	-----------------------------------------	--------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------	------------------------	----------------------------------

Table 8. Stakeholder Engagement Plan

Host community members who are project beneficiaries	Preparation, implementation, completion	Consultation meetings, focus group discussions, implementation support and M&E visits, BSS, GRM.	Kiosks, complaints box, social media, leaflets, posters, brochures, hand-outs. Relevant materials will be available in Arabic.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	TRC Community Centers	Daily, Weekly, Monthly	TRC PIU in partnership with PDMs
Other refugees	Preparation, implementation	GRM, consultation meetings	Kiosks, complaint box, social media, leaflets, posters, brochures, hand- outs. Relevant materials will be available in Arabic.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	TRC Community Centers	Monthly	TRC PIU in partnership with PDMs
Other host community members	Preparation, implementation	GRM, consultation meetings	Kiosks, complaint box, social media, leaflets, posters, brochures, hands- outs.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks	TRC Community Centers	Monthly	TRC PIU
Muhtars	Implementation	Coordination meetings	Leaflets, posters, brochures, hands- outs.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks	Community Centers, Online Communication Tools	Quarterly	TRC PIU
Beneficiaries of TRC Community Centers	Implementation	Advisory Committee Meetings (of community center beneficiaries)	Kiosks, complaint box, leaflets, posters, brochures, hands-outs.	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks	TRC Community Center	Monthly	TRC PIU

DGMM	Preparation, implementation, completion	Coordination meetings, implementation support visits	Telephone, E-mail, Quarterly reports, leaflets, posters, brochures, hands-outs.	Keeping them informed of the project's alignment with Turkey's harmonization strategy and the ESSN exit strategy	DGMM HQ in Ankara	Monthly	TRC PIU
PDM	Preparation, implementation, completion	Coordination meetings, implementation support and M&E visits	Telephone, E-mail, Quarterly reports, leaflets, posters, brochures, hands-outs.	Keeping PDMs informed of the project implementation progress; Receiving/sharing information on beneficiary relocation requests from TACs; Receiving/sharing	PDM office in target province	Monthly	TRC PIU
Kızılay Academy	Preparation, implementation	Development of 7 social cohesion training modules, implementation	Telephone, E-mail, face to face meetings (when necessary)	Conducting the necessary work for the preparation and filming of the content of online harmonization training modules	Online Communication Platforms	Weekly	TRC PIU
Directorate General of State Theatres	Preparation, implementation	purchasing processes of mobile theater vehicle, development of scripts, consultations on costumes, actresses, actors and the director.	Telephone, E-mail, face to face meetings (when necessary)	Taking part in mobile theater purchasing processes, preparing script contents, selecting actors and costumes, providing follow-up support (when necessary) during the implementation phase of the activity	Headquarters Office of DGST	Per Two Weeks	TRC PIU
Service Providers worked with for the preparation of the theater play	Preparation, implementation	Development and filming social cohesion modules	Telephone, E-mail, face to face meetings (when necessary)	Service procurement for director, actors and script  Service procurement for lighting, costume, organization and similar services	HQ Office	Weekly	TRC PIU

				information for follow-up on project beneficiaries; Increasing the effectiveness of the project;			
TAC Management	Preparation, implementation, completion	Coordination meetings, implementation support and M&E visits	Telephone, E-mail, Quarterly reports, leaflets, posters, brochures, hands-outs.	Keeping TAC Management informed of the project implementation progress; Receiving/sharing information on beneficiary relocation requests from TACs; Receiving/sharing information for follow-up on project beneficiaries; Increasing the effectiveness of the project	TAC, District Governor offices	Monthly	TRC PIU
Municipalities	Implementation	Coordination meetings	Telephone, E-mail, Quarterly reports, leaflets, posters, brochures, hands-outs.	Referring project beneficiaries to municipality-run services	Community Centers, Municipality offices	Quarterly	TRC PIU
UNHCR	Preparation, implementation, completion	Coordination meetings, implementation support visits	Telephone, videoconference, email	Providing regular updates on project implementation and progress; Coordinating possible cash assistance program implemented by UNCHR	UNHCR Office in Ankara	As needed	TRC PIU
Development Partners	Preparation, implementation, completion	Coordination meetings	Telephone, E-mail, Quarterly reports, leaflets, posters, brochures, hands-outs.	Seeking potential opportunities for referring project beneficiaries to programs implemented/financed by other development partners	To be determined	As needed	TRC PIU
TRC Child Programme	Implementation, completion	Coordination meetings	Meetings, telephone, e-mail	Increasing the effectiveness of the project focusing on refugee children	TAC, TRC HQ in Ankara	Monthly	TRC PIU

Service provider NGOs	Implementation	Coordination meetings	Telephone, reports, brochures, hands-outs.	E-mail, leaflets,	Quarterly posters,	Referring project beneficiaries to municipality-run services	Community Centers, NGO offices	As needed	TRC PIU
-----------------------	----------------	-----------------------	--------------------------------------------	-------------------	--------------------	--------------------------------------------------------------	--------------------------------	-----------	---------

## 6. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT

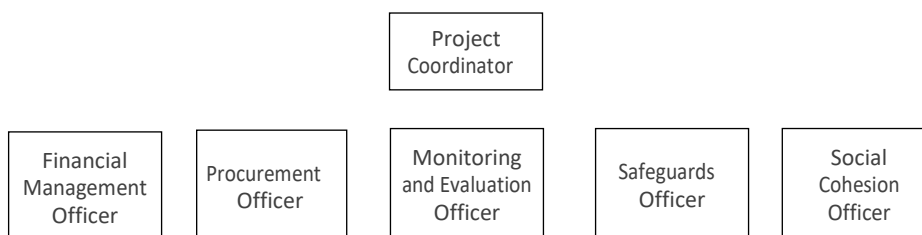
### 6.1. Implementation Arrangements

24. This section outlines the key implementation arrangements for the project's stakeholder engagement.

25. TRC PIU will assume the main responsibility for the coordination, implementation and monitoring and reporting of the SEP's implementation. TRC will establish a Project Implementation Unit (PIU), under the Community Based Migration Programs (mapped under the Migration Services Department operating under the Deputy General Directorate for International Relations and Migration Services of TRC), which will have overall responsibility for project implementation, coordinating activities on the ground, and monitoring and reporting.

26. Stakeholders could also be categorized as provincial level and national stakeholders. Regarding the national stakeholders, the Project Coordinator will directly be involved in the engagement activities and make necessary arrangements to conduct each activity. In each participating Community Center, a technical project team will be set up, consisting of a Harmonization Officer and an Interpreter. As part of the working structure of TRC Community Centres, four sub-programmes (protection, health & psycho-social support, social cohesion and socio-economic empowerment) operate through strong referral mechanism where cases are referred to necessary program in line with beneficiaries' needs. Therefore, other TRC Community Center staff and staff assigned from various agencies (i.e. psychologists, vocational trainers, language instructors, etc.) will engage in various activities to support project implementation and provision of all available TRC-provided services. For provincial level engagement, Technical Project Teams will be in charge and in contact regularly with the local stakeholders. The Technical Project Teams will also inform other units of the PIU on ad-hoc issues rising and which need to be addressed. Furthermore, based on the stakeholder engagement on the national level, Project Coordinator will also share the information with other units of the PIU and take necessary steps.

Figure 2. PIU Structure



27. The stakeholder engagement activities featured in this SEP are in alignment with TRC's existing stakeholder engagement mechanisms. Therefore, stakeholder engagement activities including the implementation of the CRM and various activities as outlined above have been budgeted by TRC. However, since TRC has not implemented World Bank-financed projects before, it has no experience of World Bank's safeguards policies or the ESF. Therefore, the TRC has appointed a social

specialist to ensure compliance of safeguards provisions during project implementation. If needed, additional resources will be made available by TRC to ensure the implementation of the SEP.

## 6.2. Roles and Responsibilities

28. Although the TRC PIU will have full responsibility on the stakeholder engagement activities detailed in this SEP, there will be other stakeholders having roles and responsibilities conducting engagement activities.

29. Roles and responsibilities are summarized below:

Table 9. Stakeholder Responsibilities

Key Stakeholder	Responsibilities
TRC Project Implementation Unit	<ul style="list-style-type: none"> <li>• Planning and implementation of the SEP</li> <li>• Coordinating with relevant units/teams (such as Child Programmes) for delivery of activities</li> <li>• Leading stakeholder engagement activities</li> <li>• Management and resolution of grievances</li> <li>• Coordination between key stakeholder</li> <li>• Monitoring and reporting of the project to DGMM, WB and other stakeholders</li> <li>• Ensures the quality of the services offered to beneficiaries</li> <li>• Timely delivery of the services and project</li> <li>• Consolidated reporting on SEP activities for the project overall</li> </ul>
DGMM	<ul style="list-style-type: none"> <li>• Ensuring necessary access to PIU to the project locations</li> <li>• Inform PIU in case of sudden developments about the TAC</li> <li>• Sharing reports received from PIU to the WB</li> </ul>
TRC Community Center	<ul style="list-style-type: none"> <li>• Delivery of services determined in the PIM outside the TAC.</li> <li>• Ensuring the sustainability of the TRC feedback mechanism</li> </ul>
PAP	<ul style="list-style-type: none"> <li>• Help the project to define mitigation measures for anticipated project risks and impacts</li> <li>• Enter their grievances using GRM defined in the SEP</li> </ul>

## 6.3. Information Disclosure

30. TRC PIU will utilize its existing online communication channels, including its official Community Centers website<sup>9</sup> and social media channels<sup>10</sup>, and facilities for disclosure of information. Project updates will be posted on TRC website and be available in relevant facilities (i.e. Community Centers, TRC headquarters information kiosks, etc.). An easy-to-understand guide to the terminology used in reports, briefs and relevant documents will be provided on the website and in-print form in the facilities, when relevant. Communication materials produced for project-related activities will be posted on the website and available in facilities in print-form. All written and visual information will be available at the TRC Community Centers and meetings held by TRC Community Centers.

#### 6.4. Monitoring and Reporting of the SEP

31. Monitoring and evaluation of the stakeholder engagement process is considered vital to ensure that TRC is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics, commitments, and activities will assist in achieving successful engagement:

- Sufficient resources allocated by TRC to undertake the engagement;
- Inclusivity (inclusion of all groups and subgroups) of interactions with stakeholders;
- Promotion of stakeholder involvement;
- Sense of trust in TRC shown by all stakeholders;
- Clearly defined approaches; and
- Transparency in all activities.

32. The project will implement two monitoring activities for the SEP: (i) during the engagement activities, short-term monitoring to allow for adjustments/improvements to be made during engagement; and (ii) following completion of engagement activities, review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented. The project SEP will be monitored based on the following indicators: (i) Number of Annual grievances received and how they have been addressed and (ii) Number of affected people involved in consultations and other project SEP related activities.

33. TRC PIU will maintain a simple database and activity file detailing all public consultation, disclosure information and grievances collected throughout the project, which will be available for public review on request. TRC PIU will ensure that records of stakeholder engagement activities are kept in the database and will include dates, venues, attendees, objectives, activity names and outcomes. In order to ensure that an accurate and detailed record of information and views are gathered at every stakeholder meeting, a consultation meeting note will be prepared. Prior to all consultations, responsibility shall be appointed to one member of the project team to take detailed notes and write up these notes immediately after the consultation using a standard Consultation Note format. Attendance lists will be completed and signed at all meetings, and whenever possible photographs will be taken and recorded.

34. Stakeholder engagement activities will be periodically evaluated by the Project Coordinator. The Project Coordinator will ensure that all consultation and disclosure activities are recorded adequately. SEP implementation will be reported in quarterly reports in the form of a separate section. The reports will include all stakeholder engagement and consultations made, grievances and resolutions, new stakeholders and progress on partnership and plans for the next quarter and longer-term plans.

---

<sup>9</sup> The website is available in Turkish, Arabic and English: <http://www.kizilaytoplummerkezleri.org/tr>

<sup>10</sup> These include Twitter: <https://twitter.com/KizilayTM/>; Facebook: <https://www.facebook.com/kizilaytm/>; Instagram: <https://www.instagram.com/kizilaytm/?hl=en>; LinkedIn: <https://www.linkedin.com/company/kizilaytm>



## **7. GRIEVANCE REDRESS MECHANISM**

### **7.1. Overview of TRC Complaints and Response Mechanism**

35. TRC has an existing grievance redress mechanism [called the Community-based Migration Programs Complaints and Response Mechanism (CRM)] that allows for safe and confidential reception of feedback, grievance and complaints from beneficiaries and the wider public. TRC has developed protocols and procedures that are implemented in all TRC Community Centers. The protocols document is regularly evaluated and updated (the last update was done in June 2019) and clearly articulates the objectives of the grievance mechanism, methods that can be used, roles and responsibilities, standard templates and forms for complaint/grievance registry, consultations, and resolution of complaints, etc. TRC will use its existing grievance mechanism, namely TRC CRM, for the GRM purposes of this project. TRC's CRM has been developed with technical and advisory assistance of the IFRC.

36. The overall goal of TRC's grievance mechanism is to support an environment of accountability and transparency through the implementation of a clear, user-friendly, accessible and transparent Complaints Response Mechanism.<sup>11</sup>

37. The CRM is intended to serve as a mechanism to: (i) allow for the identification and impartial, timely and effective resolution of issues affecting the project and (ii) strengthen accountability to beneficiaries, including project affected people, and provide channels for project stakeholders and citizens at all levels to provide feedback and raise concerns. Having an effective CRM also serves the objectives of (i) reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; (ii) improving the quality of project activities and results; and (iii) serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

38. In addition to delivering timely and accurate information, maintaining a two-way communication with communities is important to ensure that the needs, complaints and suggestions of beneficiaries and wider public are timely and regularly received and addressed. Handling feedback and complaints is an essential part of TRC's commitment to being liable to its beneficiaries and stakeholders. It can offer to validate whether specified goals are being met and signal well-timed changes or decisions to remedy or mitigate potential problems. TRC strives to improve humanitarian and development interventions through placing communities it serves at the center of its work. This is achieved through TRC's CRM which is a user-friendly, safe and accessible system for receiving, registering, managing, responding to and monitoring grievances, complaints and feedback in projects implemented by TRC.

#### **7.1. Who Can Submit Feedback or Complaint?**

39. Any individual could share feedback or a complaint, including (i) Directly involved in the activities carried out by TRC Community Centers, and (ii) indirectly affected by the activities of the TRC Community Centers, over the age of 14. Beneficiaries who are under 14 years old, either self or accompanied by a parent or guardian, can register their feedback. Children are also able to give feedback during youth club meetings. In addition, OIP may also submit feedback and complaints to

this mechanism. The OIP may also reach out to the TRC PIU directly in order to raise their concerns and can access the channels listed above.

## 7.2. Channels and Methods

40. The following is a summary of methods that will be used by TRC GRM, which is detailed in TRC's own "Complaints and Response Mechanism: Protocol":

- (a) *Speaking directly with Beneficiary Relationship Officer (BRO) at the Community Centers.* Each Community Center has a Beneficiary Relationship Officer who is responsible for receiving and recording grievances, complaints, feedback and questions. At least one male and one female BRO is present in each center to ensure accessibility of men and women to approach to CRM with their concerns. Through this officer, beneficiaries and other stakeholders can share feedback or file a complaint. TRC has clear protocols for BROs in responding to various types of cases.
- (b) *Digital kiosks (tablets).* Community Centers has tablet computers located on the desk near the feedback and complaints box at the reception area. Beneficiaries and other stakeholders can use the kiosks to register complaints and feedback. Data gathered through the kiosks are sent directly to TRC HQ. Community Center staff has no access to, or authority to manipulate, the Kiosk software or database.
- (c) *Feedback/complaints boxes.* Each Community Center has a feedback and complaints box, located in the reception area. This is a standard application for complaints and feedback collection. Signs for the boxes and feedback forms are provided in Arabic and Turkish. Beneficiaries drop their completed forms inside the box, which are locked and only accessible by TRC HQ complaints/feedback department staff. Every month, complaint boxes are sent to TRC HQ and complaints and feedback are addressed at the HQ. Community Center staff has no access or authority to open to complaint boxes.
- (d) *Informing TRC outreach staff.* TRC conducts regular field visits to engage with refugees and host community members. During such visits, direct or indirect beneficiaries of TRC activities may share their feedback and complaint. Outreach teams deliver necessary information to Beneficiary Relationship Officer.

---

<sup>11</sup> TRC. 2019. Community Based Migration Program Complaints and Response Mechanism Protocols

(e) *Advisory committee meetings.* Advisory committee comprises of representatives from host communities and refugees, and functions as a platform where stakeholders can share their feedback, complaints and concerns about TRC Community Centers services and other issues affecting them. The advisory committee supports CRM through providing information to the community members about the grievance and feedback mechanism. Specific roles of this committee in relation to CRM include: (i) disseminating information to communities on how to provide complaints/feedback to TRCS about its services, (ii) informing larger community on the actions/results of frequently made complaints, and (iii) informing TRC about communities' opinion regarding the relevance and appropriateness of TRC activities and CRM. Members of the committee cannot handle complaints, such as receiving complaints, investigating, recording and responding to complaints. Advisory Committee meetings take place once a month at the Community Centre.

(f) *TRC Hotline (#168).* Any beneficiary or stakeholder can call TRC's free hotline for grievances and complaints and providing feedback by reaching TRC Call Center. The call center provides services in five languages (Turkish, Arabic, English, Farsi, and Pashtun). The call center operates every day of the week between 08:00 - 24:00. The calls received after 24:00 are recorded in voice-announcement system, and the back-calls are made after 08:00. The call center utilizes regular phone calls, WhatsApp messaging, Facebook, Webchat, emailing via [info@kizilay.org.tr](mailto:info@kizilay.org.tr), and online forms that are available in TRC's official website ([www.kizilay.org.tr](http://www.kizilay.org.tr)). The grievances received from 168 Call Center are recorded by responsible person in Call Center and are conveyed to Social Cohesion department located in TRC HQ in Ankara.

41. Depending on the channel and the sensitivity of the issue, all complaints are resolved within 15 day up to 30 days. Only for those received via complaint boxes, it takes around 45 days to resolve.

42. Roles and responsibilities of various TRC staff and protocols of TRC CRM are explained in detail in TRC CRM Protocols document.

43. Grievances received which have been evaluated and addressed (closed), will be documented and saved. The GRM will be operated in compliance with the WB's policy requirements. TRC will use its own grievance forms, which are annexed in this SEP. A copy of the completed Grievance Form will be submitted to the complainant, if requested. A complainant will always hold the right to submit a complaint anonymously. After the corrective action is taken and the grievance is addressed, a Grievance Closeout Form will be completed by the officer in charge of grievances and signed off by the complainant.

44. In addition to TRC's own grievance mechanism, beneficiaries and stakeholders can register complaints and grievance to the Presidency Communication Center (*Cumhurbaşkanlığı İletişim Merkezi, CİMER*) via regular mail, email, telephone (#150), website or mobile app.

### 7.3 World Bank Grievance Redress System

45. Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit:

<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service> For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org)

## ANNEX. TRC COMPLAINTS AND RESPONSE MECHANISM FORMS

Complaints and Response Mechanism – Complaints/Suggestion Box

Thank you for reaching out us. If you provide your contact information, Turkish Red Crescent Society (TRCS) staff will contact you maximum within 1.5 months.

1. Is Feedback related to the person who raised the issue or someone else?

- Related to the person who raised the issue.
- Related to another person
- Related to Turkish Red Crescent staff/volunteer

(Name and Surname, Phone number \_\_\_\_\_)

1. Name and Surname

\_\_\_\_\_

2. Where do you live? (district)?

\_\_\_\_\_

3. ID/registration number

\_\_\_\_\_

4. Phone number

\_\_\_\_\_

5. Age

\_\_\_\_\_

6. Gender:  Female  Male  Prefer not to answer

7. Nationality:  Syria  Turkey  Other  Prefer not to answer

8. Status:

- Resident in Turkey
- Registered migrant
- Unregistered migrant
- TRCS Staff
- TRCS volunteer
- Prefer not to answer

9. Purpose of the visit:

Question  Complaining  Feedback  Other

10. Please describe your issue/question/complaint/feedback/rumor.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

-----

*The Complaints and Response Mechanism (CRM), based on confidentiality, deals with feedbacks regarding services of Turkish Red Crescent, in order to provide transparency to communities and other stakeholders we work with. We would like to ask you to share with us your experience about using the CRM that has been operational since 28 June 2019.*

11. Are you familiar with Complaints and Response Mechanism (CRM)?

- Yes  No

12. Have you ever shared with us any questions/information using the CRM before?

- Yes  No

13. Were the issues that last time you mentioned to us through the feedback mechanisms solved?

- Yes  
 Partially  
 In progress  
 No



Thank you for your time!

### Complaints and Response Mechanism - Field Staff

This form will be filled by field staff or Community Centre (CC). When form is filled, the survey will be shared with Beneficiary Relationship Officer (BRO) in Community Centre. In case beneficiaries have some complaints about Beneficiary Relationship Officer, the form should be put in the complaint/suggestion box. If the beneficiary gives the contact details, Turkish Red Crescent staff will contact the beneficiary within maximum 14 days for sensitive feedbacks (request, complaint etc.), and 1,5 months for non-sensitive feedbacks (request, complaint etc.).

Your name and phone number:

1. Is Feedback related to the person who raised the issue or someone else?

- Related to the person who raised the issue.  
 Related to another person

2. Name and Surname \_\_\_\_\_

3. Where do you live? (district)  
\_\_\_\_\_

4. ID/registration number  
\_\_\_\_\_

5. Phone number  
\_\_\_\_\_

6. Age \_\_\_\_\_

7. Gender:  Woman  Man  Prefer not to answer

8. Nationality:  Syria  Turkey  Other  Prefer not to answer

9. Status:

- Resident in Turkey  
 Registered migrant  
 Unregistered migrant  
 TRCS Staff  
 TRCS volunteer  
 Prefer not to answer

10. What would you like to share with us?

Question  Complaint  Feedback  Rumor

11. Please describe your issue/question/complaint/feedback/rumor

---

---

---

---

---

---

---

---

*The Complaints and Response Mechanism (CRM), based on confidentiality, deals with feedbacks regarding services of Turkish Red Crescent, in order to provide transparency to communities and other stakeholders we work with. We would like to ask you to share with us your experience about using the CRM that has been operational since 28 June 2019.*

12. Are you familiar with Complaints and Response Mechanism (CRM)?

Yes  No

13. Have you ever shared with us any questions/information using the CRM before?

Yes  No

14. Were the issues that last time you mentioned to us through the feedback mechanisms solved?

Yes  
 Partially  
 In progress  
 No



Thank you for your time!





TURK  
KIZILAY