SUPPORT TO REFUGEES TRANSITIONING TO COMMUNITIES PROJECT

Stakeholder Engagement Plan

02 December 2019
## REVISION HISTORY

<table>
<thead>
<tr>
<th>Version Date</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>12 October 2019</td>
<td>Shared with the World Bank for review and comments</td>
</tr>
<tr>
<td>21 October 2019</td>
<td>This version of the SEP is approved by the World Bank for disclosure as draft SEP</td>
</tr>
<tr>
<td>02 December 2019</td>
<td>The following revisions are made: (i) Project Affected Parties to clarify the description of some project stakeholder subgroups (Section 4, Table 5); (ii) Section 5.2 revised to ensure the activities are presented in the form of an action plan with actions that can be monitored and for clarity the overview plan is revised as overview program; (iii) Section on budget added to confirm TRC’s financial and human resource allocation to the implementation of the SEP (Section 6.5 Estimated Budget); (iv) ESF requirement on information disclosure added to confirm availability of information in relevant languages (Section 6.3 Information Disclosure); and project name and project development objective statement revised to reflect the changes to the project design before project approval.</td>
</tr>
</tbody>
</table>
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 Refugees Transitioning to Communities 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.
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>BSS</td>
<td>Beneficiary Satisfaction Survey</td>
</tr>
<tr>
<td>CRM</td>
<td>Turkish Red Crescent Complaints and Response Mechanism</td>
</tr>
<tr>
<td>DGMM</td>
<td>Directorate General for Migration Management</td>
</tr>
<tr>
<td>ESF</td>
<td>Environmental and Social Framework</td>
</tr>
<tr>
<td>ESS</td>
<td>Environmental and Social Standard</td>
</tr>
<tr>
<td>FGD</td>
<td>Focus Group Discussion</td>
</tr>
<tr>
<td>FRIT</td>
<td>Facility for Refugees in Turkey</td>
</tr>
<tr>
<td>GRM</td>
<td>Grievance Redress</td>
</tr>
<tr>
<td>GRS</td>
<td>Grievance Redress Service</td>
</tr>
<tr>
<td>IOM</td>
<td>International Organization for Migration</td>
</tr>
<tr>
<td>LMP</td>
<td>Labor Management Procedures</td>
</tr>
<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
</tr>
<tr>
<td>PDM</td>
<td>Provincial Directorate of Migration</td>
</tr>
<tr>
<td>PIM</td>
<td>Project Implementation Manual</td>
</tr>
<tr>
<td>PIU</td>
<td>Project Implementation Unit</td>
</tr>
<tr>
<td>PPM</td>
<td>Public Participatory Meeting</td>
</tr>
<tr>
<td>SEP</td>
<td>Stakeholder Engagement Plan</td>
</tr>
<tr>
<td>TAC</td>
<td>Temporary Accommodation Centers</td>
</tr>
<tr>
<td>TRC</td>
<td>Turkish Red Crescent</td>
</tr>
<tr>
<td>UNDP</td>
<td>United Nations Development Programme</td>
</tr>
<tr>
<td>UNFPA</td>
<td>United Nations Population Fund</td>
</tr>
<tr>
<td>UNHCR</td>
<td>United Nations High Commissioner for Refugees</td>
</tr>
<tr>
<td>UNWOMEN</td>
<td>The United Nations Entity for Gender Equality and the Empowerment of Women</td>
</tr>
<tr>
<td>WB</td>
<td>World Bank</td>
</tr>
</tbody>
</table>
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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 November 2019, more than 3.6 million Syrian refugees (98.3 percent) live among host communities whereas about 62,000 refugees still remain in seven temporary accommodation centers (TACs) located in southeastern provinces.\(^1\) 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.\(^2\)

1.2. About the Project

2. The project development objective is to support the transition of refugees to community living in target provinces in Turkey. In broad terms, the project aims to contribute to the readiness of refugees for urban and community living and 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 to enhance their inclusion and readiness to live amongst communities in Turkey.

3. The Project will primarily target (a) refugees living in Adana (Sarışan TAC), Hatay (Altnözü and Yayladağı TACs), Kahramanmaraş (Merkez TAC), and Kilis (Elbeyli TAC) who want to relocate to communities in target provinces and (b) refugees who have recently relocated from TACs to target project provinces. 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 community of relocation. Given that relocation to communities from TACs is voluntarily and DGMM approves relocation applications on a first-come-first-serve basis, it is not possible to estimate the number of beneficiaries who would be relocating or the provinces of relocation. Therefore, the Project will apply a flexible beneficiary targeting approach to ensure that services are available to the following sub-categories of refugee beneficiaries: (i) Refugees living in TACs who apply for relocation (or who have recently relocated) to a target project provinces; (ii) Refugees living in TACs who want to relocate to another province where TRC has a Community Center; (iii) Refugees living in TACs who want to relocate to a province without a TRC Community Center; (iv) Refugees who want to relocate

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\(^1\) Directorate General of Migration Management. 2019. Available at: https://www.goc.gov.tr/gecici-koruma5638
\(^2\) The 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
to another TAC; and (v) Refugees residing in target project provinces who never lived in a TAC who are interested in harmonization activities. In addition, through social cohesion activities, the project will also reach other refugees and host community members.

Table 1. Temporary Accommodation Centers and Refugee Population (November 2019)

<table>
<thead>
<tr>
<th>Province</th>
<th>TAC</th>
<th>Number of Refugees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adana</td>
<td>Sarıçam</td>
<td>19,251</td>
</tr>
<tr>
<td>Hatay</td>
<td>Altınözü</td>
<td>2,675</td>
</tr>
<tr>
<td></td>
<td>Yayladaği</td>
<td>4,111</td>
</tr>
<tr>
<td>Kahramanmaraş</td>
<td>Merkez</td>
<td>11,000</td>
</tr>
<tr>
<td>Kilis</td>
<td>Elbeyli</td>
<td>8,515</td>
</tr>
<tr>
<td>Osmaniye&lt;sup&gt;3&lt;/sup&gt;</td>
<td>Cevdetiye</td>
<td>12,976</td>
</tr>
</tbody>
</table>

4. 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. 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 activities.

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

Table 2. Project Component Structure

<table>
<thead>
<tr>
<th>Project Development Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed development objective is to support the transition of refugees to community living in target provinces in Turkey.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Component One: Support to Harmonization of Refugees and Host Communities</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Subcomponent</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a. Information, Counselling and Referral Services for Harmonization</td>
<td>Profiling and screening for support services</td>
</tr>
</tbody>
</table>

<sup>3</sup> Cevdetiye TAC is not included in the initial phase of the project.
6. 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 ensure the planned support services are delivered primarily to refugees who live or have lived in TACs.

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

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Primary Target Beneficiary Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Refugee departures from TACs are in line with projections</td>
<td>The project will target refugees who have applied and processed for relocation to communities during project implementation.</td>
</tr>
<tr>
<td>Refugee departures are significantly higher than projections</td>
<td>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.).</td>
</tr>
<tr>
<td>Refugee departures from TACs are irregular</td>
<td>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.</td>
</tr>
<tr>
<td>No or insignificant number refugee departures from TACs</td>
<td>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.</td>
</tr>
</tbody>
</table>

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 administration1.”

**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.”

“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.”
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.4

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 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 were carried out 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 subgroups. 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.

15. 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.

Table 4. Summary of Consultations

<table>
<thead>
<tr>
<th>Location</th>
<th>Date</th>
<th>Participants</th>
<th>Key Points of Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ankara</td>
<td>December 2018-August 2019</td>
<td>DGMM</td>
<td>• Understanding Turkey’s national harmonization strategy and government’s plans with regards to TACs</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Discussion on social cohesion aspects of the national harmonization strategy</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Informing on the project preparation and implementation timeline and milestones</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Discussion on the implementation arrangements</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Informing on the World Bank’s support in technical assistance to DGMM</td>
</tr>
<tr>
<td>Osmaniye</td>
<td>July 2019</td>
<td>Cevdetiye TAC</td>
<td>• Understanding information and socio-economic inclusion support needs and economic opportunities of the TAC-based refugee population who would be transitioning from TACs to communities</td>
</tr>
<tr>
<td>Hatay</td>
<td>July 2019</td>
<td>Local Governor of Altınözü District, Altınözü TAC, Eastern Mediterranean Development Agency</td>
<td>• Collecting feedback from local stakeholders on the project approach</td>
</tr>
<tr>
<td>Adana</td>
<td>August 2019</td>
<td>Sarıçam TAC</td>
<td></td>
</tr>
<tr>
<td>Kahramanmaraş</td>
<td></td>
<td>Deputy Governor of Kahramanmaraş Province,</td>
<td></td>
</tr>
</tbody>
</table>
### PDM, Merkez TAC

- Adana
- October 2019

- Sarışam TAC
- Merkez TAC
- Understanding information and socio-economic inclusion support needs and economic opportunities of the TAC-based refugee population who would be transitioning from TACs to communities

### Development Partners

- Ankara
- February 2019
- FRIT Coordination Office, Delegation of the European Union to Turkey
- Understanding EU IPA priorities in the area of harmonization

- Ankara
- February-August 2019
- UNHCR
- Learning experiences on transition of TAC refugees to communities
- Understanding the implementation and experience of the ‘alternative to camps program’, through which UNHCR provided cash assistance to transitioning refugees
- Discussions on establishment of coordination mechanism with UNHCR during project implementation

- Ankara
- July 2019
- UNDP, UNFPA, IOM, UNWOMEN
- Learning experiences and knowledge sharing on projects of partners providing socio-economic support to refugees in project target provinces

### NGOs

- Ankara
- February 2019
- ASAM
- Learning on ASAM’s socio-economic support services provided at the multi-service centers

- Ankara
- July-September 2019
- TRC Community-based Migration Programs
- Learning on TRC’s socio-economic support services provided at the community centers

- Adana
- August 2019
- TRC Community Center
- Understanding the implementation and functions of TRC’s grievance and complaints mechanism

- Kahramanmaraş
- October 2019

### 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.” 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.” For example, these parties may include regulators,

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6 Ibid.
government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups

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

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Description</th>
<th>Issues/Interaction</th>
<th>Significance Level - Interest</th>
<th>Significance Level - Influence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Refugees in TACs and refugees who recently relocated to communities</td>
<td>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.</td>
<td>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. 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.</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Women Refugees who live in TACs or who have recently relocated from TACs</td>
<td>Women leaving TACs</td>
<td>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.</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Children refugees who live in TACs or who have recently relocated from TACs</td>
<td>Children whose parents transitioning from TACs, needing support on registration to orientation for new schools</td>
<td>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.</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td>Vulnerable groups who need as unaccompanied</td>
<td>Turkish Law defines people with needs as unaccompanied</td>
<td>Government’s policy is to offer accommodation to refugees who have</td>
<td>Medium</td>
<td>Low</td>
</tr>
</tbody>
</table>
live in TACs or who have recently relocated from TACs) 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. 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.

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 have no access to such support High Low

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. Medium 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

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

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Description</th>
<th>Key Role</th>
<th>Significance Level - Interest</th>
<th>Significance Level - Influence</th>
</tr>
</thead>
<tbody>
<tr>
<td>DGMM</td>
<td>DGMM is responsible for ensuring refugee inclusion program is in alignment with the national harmonization strategy and action plan. DGMM is also</td>
<td>DGMM will lead project steering meetings which will take place monthly. DGMM will also approve project work plan.</td>
<td>High</td>
<td>High</td>
</tr>
</tbody>
</table>

14
<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Description</th>
<th>Responsibility</th>
<th>Coordination Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>PDMs</td>
<td>Directorate General of Migration Management (DGMM) through PDMs is responsible for TACs, including review/approval of relocation applications and benefits</td>
<td>PDM will be informed on a regular basis for operational issues.</td>
<td>High</td>
</tr>
<tr>
<td>TAC Management</td>
<td>District Governors and Deputy TAC Coordinators are responsible for day-to-day management of TACs</td>
<td>TAC management will inform TRC on refugees who requested relocation from TACs. TAC Management will provide necessary physical space for TRC use to deliver project activities implemented in TACs.</td>
<td>High</td>
</tr>
<tr>
<td>Municipalities</td>
<td>Some municipalities operate service/advisory centers to support refugee inclusion</td>
<td>The project will coordinate with available municipality-run refugee support centers to link beneficiaries who need additional support.</td>
<td>Medium</td>
</tr>
<tr>
<td>UNHCR</td>
<td>UNHCR provided cash assistance to refugees who resettled from TACs to communities between August 2018 and 2019.</td>
<td>The project will coordinate with UNCHR regularly.</td>
<td>Medium</td>
</tr>
<tr>
<td>TRC Child Programme</td>
<td>TRC Child Programme: TRC has Child and Youth Friendly spaces in TACs</td>
<td>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.</td>
<td>Low</td>
</tr>
<tr>
<td>Service provider NGOs</td>
<td>Local and international NGOs providing services such as vocational and technical skills training, entrepreneurship support, employment support, psycho-social support, etc.</td>
<td>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.</td>
<td>Low</td>
</tr>
<tr>
<td>Development Partners</td>
<td>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.</td>
<td>The project will coordinate with development partners through existing coordination mechanisms.</td>
<td>Medium</td>
</tr>
</tbody>
</table>

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 that are under preparation.

20. Table showing potential future stakeholders is provided below.
<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Description</th>
<th>Key Role</th>
<th>Significance Level - Interest</th>
<th>Significance Level - Influence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turkish Employment Agency (İŞKUR)</td>
<td>İŞKUR will implement a new project that has a component on profiling and matching eligible refugees and Turkish citizens with the potential employers</td>
<td>Beneficiaries of the project might be referred to various projects. Implementing entities of various projects may include project beneficiaries in their activities.</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>Agricultural Credit Cooperatives (ACC-TKK)</td>
<td>The ACC will implement a project for agricultural development. Project includes matching host community and refugee and Turkish citizens with agriculture labor and employers.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development Agencies</td>
<td>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.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 addition to face-to-face meetings, the project will consult with stakeholders via 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 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.

(e) **Social Media.** Social media accounts\(^7\) 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. Therefore, TRC will implement its existing grievance and complaints mechanism for the project. Grievance 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 at TRC Community Centers. Reporting will be undertaken quarterly as part of quarterly reports and other available means utilized by TRC Community Centers.

\(^7\) Community Center social media accounts can be reached at the user name @KizilayTM.
5.2. Overview of Stakeholder Engagement Program

Table 8. Planned Stakeholder Engagement Activities by Project Phase (Stakeholder Engagement Program)

<table>
<thead>
<tr>
<th>Project Stage</th>
<th>Target Stakeholders</th>
<th>Topic(s) of Engagement</th>
<th>Method(s) Used</th>
<th>Location/Frequency</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design of Project Activities and implementation</td>
<td><strong>Project Affected Parties</strong> - Refugees in TACs and refugees who recently relocated from TACs to communities; Women Refugees and Vulnerable People who live in TACs or who have recently relocated from TACs; TAC Muhtars; Other refugees</td>
<td>Project scope and objectives; Harmonization training and processes; Socio-economic empowerment activities; CRM process</td>
<td>Public consultation meetings&lt;sup&gt;10&lt;/sup&gt;; Seminars, trainings, and workshops; Social Media Communication via official TRC channels (Facebook, YouTube, Twitter, Instagram, WhatsApp); Disclosure of written&lt;sup&gt;11&lt;/sup&gt; information (brochures, posters, flyers, leaflets) available at information desks in TACs and TRC Community Centers; Kiosks available in TRC Community Centers and HQ, CRM, BSS</td>
<td>Monthly public consultation meetings in participating TRC Community Centers; Communication via social media (as needed, as part of TRC’s ongoing communication activities); TRC Community Center and TAC Information desks and TRC Community Center kiosks with written information (ongoing); BSS (every 6 months).</td>
<td>TRC PIU</td>
</tr>
<tr>
<td>Design of Project Activities and implementation</td>
<td><strong>Project Affected Parties</strong> - Host community members who are project beneficiaries</td>
<td>Project scope and objectives; CRM process</td>
<td>Public consultation meetings; Social Media Communication via official TRC channels (Facebook, YouTube, Twitter, Instagram, WhatsApp); Disclosure of written information (brochures, posters, flyers, leaflets) available at information desks in TACs and TRC Community Centers; Kiosks available in TRC Community Centers and HQ, CRM</td>
<td>Same as above.</td>
<td>TRC PIU</td>
</tr>
<tr>
<td>Design of Project Activities and implementation</td>
<td><strong>Project Affected Parties</strong> -</td>
<td>Project scope and objectives</td>
<td>Public consultation meetings; Social Media Communication via official TRC</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

8 TACs and Community Centers have accessibility features to ensure participation of vulnerable groups, including persons with disabilities. Trained specialists in TACs and TRC Community Centers will ensure, when needed, implementation of engagement activities tailored to the needs of vulnerable groups, women and children refugees. TACs and TRC Community Centers have child and youth friendly spaces and relevant staff working at TACs and TRC Community Centers are trained/certified for working with vulnerable groups, women and children.

9 TRC Child Programme will support the engagement with children refugees.

10 TRC conducts monthly advisory committee meetings in each TRC Community Centers. Public consultations will be carried out as part of these meetings.

11 Relevant materials will be available in Arabic.
| Completion | Other host community members; Beneficiaries of TRC Community Centers | channels (Facebook, YouTube, Twitter, Instagram, WhatsApp), Disclosure of written information (brochures, posters, flyers, leaflets), kiosks available in TRC Community Centers and HQ, CRM |  |
|------------|--------------------------------------------------|--------------------------------------------------------------------------------------------------|  |
| **Project Affected Parties – Muhtars** | Project scope and objectives; Relocation to communities | Coordination meetings (face-to-face or phone) | As needed |
| **Other Interested Parties – DGMM, PDM, TAC Management, UNHCR** | Project scope and objectives; Harmonization training and socio-economic empowerment options; Coordination activities; Relocation to communities; CRM process | Coordination meetings (face-to-face or phone); joint public consultation meetings with PAPs | As needed |
| **Other Interested Parties – Municipalities, Service provider NGOs, Development Partners** | Relocation to communities; Referrals of project beneficiaries to available support services provided by other organizations | Coordination meetings (face-to-face or phone) | As needed |
| **Other Interested Parties – TRC Child Programme** | Specific activities and processes with regards refugee children | Coordination meetings (face-to-face or phone) | As needed |
| **Project Affected Parties - Refugees in TACs and refugees who recently relocated from TACs to communities; Women, Children and Vulnerable People who live in TACs or who have recently relocated from TACs; TAC Muhtars; Other refugees; Host community members who are project beneficiaries** | Satisfaction with engagement activities; CRM process | Public consultation meetings; Social Media Communication via official TRC channels (Facebook, YouTube, Twitter, Instagram, WhatsApp); Disclosure of written information (brochures, posters, flyers, leaflets) available at information desks in TACs and TRC Community Centers; Kiosks available in TRC Community Centers and HQ, CRM, BSS | Monthly public consultation meetings in participating TRC Community Centers; Communication via social media (as needed, as part of TRC’s ongoing communication activities); TRC Community Center and TAC Information desks and TRC Community Center kiosks with written information (ongoing); BSS (every 6 months). |
| **Project Affected Parties – Muhtars** | Relocation to communities; Harmonization process | Coordination meetings (face-to-face or phone) | As needed | TRC PIU |
| **Other Interested Parties – DGMM, PDM, TAC Management, UNHCR.** | Relocation to communities; Harmonization process | Coordination meetings (face-to-face or phone) | As needed | TRC PIU |
| **Other Interested Parties – Municipalities, Service provider NGOs, Development Partners** | Relocation to communities; Referrals to services provided by other organizations | Coordination meetings (face-to-face or phone) | 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 case worker, harmonization trainer and an interpreter. 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.

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
(Safeguards Officer) to ensure compliance of safeguards provinces 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>
<thead>
<tr>
<th>Key Stakeholder</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>TRC Project Implementation Unit</td>
<td>• Planning and implementation of the SEP</td>
</tr>
<tr>
<td></td>
<td>• Coordinating with relevant units/teams (such as Child Programmes) for delivery of activities</td>
</tr>
<tr>
<td></td>
<td>• Leading stakeholder engagement activities</td>
</tr>
<tr>
<td></td>
<td>• Management and resolution of grievances</td>
</tr>
<tr>
<td></td>
<td>• Coordination between key stakeholder</td>
</tr>
<tr>
<td></td>
<td>• Monitoring and reporting of the project to DGMM, WB and other stakeholders</td>
</tr>
<tr>
<td></td>
<td>• Ensures the quality of the services offered to beneficiaries</td>
</tr>
<tr>
<td></td>
<td>• Timely delivery of the services and project</td>
</tr>
<tr>
<td></td>
<td>• Consolidated reporting on SEP activities for the project overall</td>
</tr>
<tr>
<td>DGMM</td>
<td>• Ensuring necessary access to PIU to the project locations</td>
</tr>
<tr>
<td></td>
<td>• Inform PIU in case of sudden developments about the TAC</td>
</tr>
<tr>
<td></td>
<td>• Sharing reports received from PIU to the WB</td>
</tr>
<tr>
<td>TRC Community Center</td>
<td>• Delivery of services determined in the PIM outside the TAC.</td>
</tr>
<tr>
<td></td>
<td>• Ensuring the sustainability of the TRC feedback mechanism</td>
</tr>
<tr>
<td>TAC Management</td>
<td>• Sharing information on households leaving the TAC</td>
</tr>
<tr>
<td></td>
<td>• Providing and maintaining necessary place to conduct project activities inside TAC</td>
</tr>
<tr>
<td>PAP</td>
<td>• Help the project to define mitigation measures for anticipated project risks and impacts</td>
</tr>
<tr>
<td></td>
<td>• Enter their grievances using GRM defined in the SEP</td>
</tr>
</tbody>
</table>

6.3. Information Disclosure

30. TRC PIU will utilize its existing online communication channels, including its official Community Centers website\(^{12}\) and social media channels\(^{13}\), 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.

31. As per the ESF requirements, the information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups

\(^{12}\) The website is available in Turkish, Arabic and English: [http://www.kizilaytoplummerkezleri.org/tr](http://www.kizilaytoplummerkezleri.org/tr)

\(^{13}\) These include Twitter: [https://twitter.com/KizilayTM](https://twitter.com/KizilayTM); Facebook: [https://www.facebook.com/kizilaytm/](https://www.facebook.com/kizilaytm/); Instagram: [https://www.instagram.com/kizilaytm/?hl=en](https://www.instagram.com/kizilaytm/?hl=en); LinkedIn: [https://www.linkedin.com/company/kizilaytm](https://www.linkedin.com/company/kizilaytm)
that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility).

6.4. Monitoring and Reporting of the SEP

32. 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.

33. 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.

34. 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 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.

35. 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.

6.5. Estimated Budget

36. TRC is already implementing the above-mentioned stakeholder engagement activities at the Community Centers. The cost of these activities is already included in annual work plans and budget of the Community Centers. Therefore, no project-specific SEP budget is required at this stage. If additional resources are required, TRC will allocate more financial and staff resources to the implementation of project SEP.
7. GRIEVANCE REDRESS MECHANISM

7.1. Overview of TRC Complaints and Response Mechanism

37. 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.

38. 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.\(^{14}\)

39. 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.

40. 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.

7.2. Who Can Submit Feedback or Complaint?

41. 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.

\(^{14}\) TRC. 2019. Community Based Migration Program Complaints and Response Mechanism Protocols.
7.3. **Channels and Methods**

42. 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.

(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, and online forms that are available in TRC’s official website.
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.

43. 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.

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

45. 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.

46. 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.

7.4. World Bank Grievance Redress System

47. 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:
For information on how to submit complaints to the World Bank Inspection Panel, please visit 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 mechanism 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 mechanism solved?
    □ Yes
    □ Partially
    □ In progress
    □ No

Thank you for your time!