

**TURKEY: SUPPORT FOR TRANSITION TO
LABOR MARKET PROJECT**

Stakeholder Engagement Plan

FINAL
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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.

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 for Transition to Labor Market 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

ALMPs	Active Labor Market Programs
CCs	Turkish Red Crescent Community Centers
CRM	Turkish Red Crescent Complaints and Response Mechanism
DG	Directorate General
DA	Development Agency
DGILF	Directorate General of International Labour Force
DGMM	Directorate General of Migration Management
ESS	Environmental and Social Standard
ESSN	Emergency Social Safety Net
EU	European Union
EUD	European Union Delegation to Turkey
FRIT	Facility for Refugees in Turkey
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IOM	International Organization for Migration
İŞKUR	Turkish Employment Agency
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MoFLSS	Ministry of Family, Labour and Social Services
PD	Provincial Directorate
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PPM	Public Participatory Meeting
SEP	Stakeholder Engagement Plan
SPF	State and Peacebuilding Trust Fund
SuTP	Syrians under Temporary Protection
TACs	Temporary Accommodation Centers
TRC	Turkish Red Crescent (Türk Kızılay)
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

GLOSSARY	1
ABBREVIATIONS AND ACRONYMS.....	2
1. INTRODUCTION	4
1.1. Context	4
1.2. About the Project.....	4
1.3. Purpose of the Stakeholder Engagement Plan.....	4
2. OVERVIEW OF NATIONAL LEGISLATION.....	6
2.1. National Legislation and Regulations	6
2.2. World Bank Environmental and Social Standard on Stakeholder Engagement.....	7
3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	8
4. STAKEHOLDER IDENTIFICATION AND ANALYSIS	10
5. STAKEHOLDER ENGAGEMENT PLAN	15
5.1. Stakeholder Engagement Methods to be used.....	15
5.2. Overview of Stakeholder Engagement Plan.....	17
6. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT	19
6.1. Implementation Arrangements	19
6.2. Roles and Responsibilities.....	20
6.3. Information Disclosure.....	20
6.4. Monitoring and Reporting of the SEP	21
7. GRIEVANCE REDRESS MECHANISM (GRM).....	22
7.1. Overview of Complaints and Response Mechanism.....	22
7.2. MoFLSS and İŞKUR GRM Overview & Structure	22
7.3. MoFLSS and İŞKUR GRM Communication & Process.....	24
7.4. MoFLSS and İŞKUR Grievance Logs	24
7.5. MoFLSS and İŞKUR Monitoring and Reporting on Grievances.....	25
7.6. Turkish Red Crescent’s GRM Overview and Structure	25
7.6.1. Who Can Submit Feedback or Complaint?	26
7.6.2. Channels and Methods	26
7.7. Handling Sensitive Grievances.....	27
7.8. World Bank Grievance Redress System.....	28
8. BUDGET	29
ANNEXES	30
Annex 1: Sample Grievance Form and Grievance Closeout Form	30
Annex 2: List of Participants	32
Annex 3: Summary of Consultations	33

1. INTRODUCTION

1.1. Context

Turkey, although being categorized as a country of origin in terms of migration for many years, has transformed into a target and transit country in the last 10-20 years. In this period, the economic conditions and protective environment offered have attracted a growing number of migrants, including from the Middle East, the EU and CIS countries. These large-scale population movements have affected Turkey's demographic, economic and social development. This also affected migration policy development processes.

According to Directorate General for Migration Management data, 3.6 million Syrians are under temporary protection of Turkey as of January 2021. Turkey's policy response has been progressive and provides a model to other countries. However, the magnitude of the migrant influx continues to pose challenges for displaced persons, host communities, and the country at large. This situation requires the development and support of comprehensive projects for the socioeconomic sector.

1.2. About the Project

Project Provinces	İstanbul, Adana, Gaziantep, Şanlıurfa, Kocaeli, Bursa, Konya, İzmir
Donor	European Union
Funding Source	Phase II of Facility for Refugees in Turkey (FRIT-2)
Recipient	Ministry of Family, Labour and Social Services (MoFLSS)
Duration	36 Months, Planned Starting Date: February 2021
Budget	80.000.000 Euro
Project Implementing Partners	<ul style="list-style-type: none">• World Bank (Intermediary Financial Institution)• Ministry of Family, Labour and Social Services• İŞKUR• Turkish Red Crescent
Project Beneficiary	Turkish citizens, Syrians under temporary protection, international protection applicants and status holders including ESSN beneficiaries

This project is executed under the FRIT where the EU is the “donor”, MoFLSS is the “recipient” of the grant and “main coordinator (project coordinator)”, and the WB acts as the “intermediary” or “grant administrator” having fiduciary and technical oversight responsibilities in the implementation of the grant.

1.3. Purpose of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) defines the stakeholder engagement strategy of MoFLSS, İŞKUR and TRC throughout the course of the project. The plan includes the method and tools that will be used as part of the engagement approach, summarizes previous

engagement activities carried out, and defines the roles and responsibilities of MoFLSS, İŞKUR and 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 considered 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 İŞKUR and 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.

This is a 'living' document and will be updated further as and when more information becomes available.

2. OVERVIEW OF NATIONAL LEGISLATION

2.1. National Legislation and Regulations

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.”¹

“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 no. 4982 on the Right to Information (Article 11)

“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 (Article9)

- 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 chairperson. 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

This stakeholder engagement plan is a requisite of the WB as mentioned in Environmental and Social Standard 10 in its regular operations¹. This standard requires that a SEP that is proportionate to the nature and scale of the project and its potential risks and impacts is developed, that it is disclosed as early as possible before project appraisal, and that the Recipient 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 subsequent to any significant changes to the original version (World Bank, 2017: 99). In addition, a grievance mechanism will need to be established 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.² Although not being a typical WB operation, under this specific project, MoFLSS consents to prepare a SEP upon the request of WB.

In this context, MoFLSS will monitor and coordinate the agencies in charge of various components of the project as well as their operations and maintain communication with the donor and the intermediary. These functions will be executed through Directorate General for International Labor Force (DGILF) and DGILF Project Implementation Unit (PIU) will act as the contact point.

¹ The World Bank's Environmental and Social Framework requires that the Stakeholder Engagement Plan be prepared by the party defined as the "borrower" for submission to the World Bank as the donor. The World Bank acknowledges and declares that under the project for which this Stakeholder Engagement Plan has been prepared and which is being executed within the framework of FRIT, "European Union" is the donor, that there is no borrowing relationship, and that MoFLSS is the "Recipient" of the grant and main (project) coordinator, and the World Bank" holds the status of "intermediary".

² 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 and <http://projects-beta.vsemirnyjbank.org/ru/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder consultations were carried out by the WB as part of project preparation. In addition to getting feedback on the proposed project, the consultations also offered an opportunity to obtain input from stakeholders regarding challenges in the ongoing SPF Project implemented by TRC, which had implications for the design of the current project³.

The institutions / people consulted during this process are as follows:

- a) İŞKUR Provincial Directorates (PDs) (Hatay, Adana, Istanbul, Sanliurfa and Gaziantep)
- b) Employers in the above provinces
- c) Jobseekers at workplaces participating in on-the-job training programs in the above provinces
- d) Consultations with CC staff (16 centers) in Ankara and visits in Istanbul and to Hatay Service Center
- e) UN Agencies, especially UNDP.
- f) EUD and DG ECHO
- g) Some NGOs in the provinces above that have ongoing activities for SuTP

The consultations mainly centered on the challenges to and good examples of labor market integration of migrants. In extension of this, the risk of tensions between Turkish and refugee workers working at the same workplace was also discussed. Overall, the consultations revealed the following: (i) Many SuTP are working, but there is high informality; (ii) They mostly use their own network and channels (social media, relatives, friends) to find a job; (iii) They might hesitate to engage in formalized employment, especially if they receive cash transfer/ assistance; (iv) Existing programs/projects of different agencies for migrants show a lot of overlaps, and inadequate coordination; (v) Some provinces visited showed good examples of response efforts (e.g. between İŞKUR and TRC in Istanbul); (vi) Many job opportunities exist for migrants due to low interest in these vacancies from Turkish labor force (vii) Some employers find ways to strengthen harmonious relations between local workers and SuTP.

Table 1. Summary of Consultations, October 2018-September 2019

Location	Participants	Key Points of Discussion
Hatay, Adana, Istanbul, Sanliurfa, Gaziantep	<ul style="list-style-type: none"> • İŞKUR PDs 	<ul style="list-style-type: none"> • İŞKUR already collaborates with UNHCR, UNDP and IOM in the ongoing project • Feedback on challenges in ongoing program and implications on planned program
Hatay, Adana, Istanbul, Sanliurfa and Gaziantep	<ul style="list-style-type: none"> • Employers in the province • Jobseekers in the provinces who were met at workplaces of employers participating in on the job training programs 	<ul style="list-style-type: none"> • Employment situation for SuTP (formal vs informal) • Job opportunities in provinces • Relations between SuTP employees and local employees

³ The list of meetings/discussions provided in this section has been provided by the World Bank and MoFLSS/DGILF does not provide any guarantee about the contents of these activities and their connection with this Stakeholder Engagement Plan.

Ankara	Staff of 16 CCs	<ul style="list-style-type: none"> • Feedback on challenges in ongoing program and implications on planned program
Istanbul, Adana	Staff of CCs	<ul style="list-style-type: none"> • Feedback on challenges in ongoing program and implications on planned program
Hatay	TRC Service Center	<ul style="list-style-type: none"> • Feedback on challenges in ongoing program and implications on planned program
Ankara	UNDP, WFP, Other UN Agencies	<ul style="list-style-type: none"> • Complementarity between WFP program for the cash transfer scheme of SuTP and current project. • Difficulties in integrating cash transfer beneficiaries into the labor
Ankara	EU/ECHO	<ul style="list-style-type: none"> • Cash transfer (beneficiary SuTP)
Hatay, Adana, Istanbul, Sanliurfa, Gaziantep	NGOs with ongoing activities in the particular province	<ul style="list-style-type: none"> • Learning experiences and knowledge sharing on projects of partners providing socio-economic support to SuTP in project target provinces

Due to the COVID 19 pandemic, physical meetings are not possible due to social distancing measures. MoFLSS shared notes and documents explaining the project and relevant procedures with project stakeholders in order to get feedback. E-mails to 60 stakeholders including 5 public bodies, 10 Chambers of Industry and Commerce, Development Agencies, Provincial Directorates of Industry and Trade in project provinces, 10 international organizations and 6 social partners (full list of stakeholders provided as Annex 2) were sent on 17 July 2020 and the documents were updated in line with the comments received. A summary table of those opinions/feedbacks and the responses can be found in Annex 3. Throughout implementation of this SEP, MoFLSS, İŞKUR and TRC will continue its feedback processes and update the documents, as needed.

Also, WB has presented the project details with 3RP Regional Refugee and Resilience Plan Livelihoods Working Group members in the monthly virtual meeting on 22 July 2020 and got feedback from the members. Livelihood Working Group includes members from public institutions, international organizations, non-governmental organizations and other civil society organizations.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

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.”⁴ They are the individuals or households most likely to observe changes from social impacts of the project.
- (b) *Other interested parties (OIPs)* refer 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.”⁵ 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.

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

Table 2. Project-affected Parties

Stakeholder	Description	Issues/Interaction	Significance Level	
			Interest	Influence
Migrant and SuTP jobseekers in selected provinces	Directly benefitting from project activities (targeted population): Migrants and ESSN beneficiaries in selected provinces willing to be formally registered with İŞKUR are eligible.	Project Beneficiaries will be selected from workable ESSN beneficiary lists to be received from TRC and jobseekers registered with İŞKUR. Beneficiaries will be screened for their needs and employability status. Selected beneficiaries will be offered employment support, job and vocational counseling services and appropriate referrals based on their needs. Also, İŞKUR will be sharing their data on the people that were subject to Applied Training Programs with MoFLSS. MoFLSS will validate the ones who were benefited with ESSN at least once. ⁶	High	Medium
Female ESSN Beneficiaries and SuTP	Among eligible migrants and ESSN beneficiaries	Women are highly hesitant about working outside their homes and have lower levels	High	Medium

⁴ World Bank. 2016. “World Bank Environmental and Social Framework.” World Bank, Washington, DC.

⁵ Ibid.

⁶ This section will again be updated according to latest Project Appraisal Document

	from selected provinces, there will be a quota for female beneficiaries.	of skills and language abilities than men and SuTP. Women have low level of interaction and relationship with people in their surroundings.		
Turkish jobseekers	Turkish jobseekers residing in selected provinces.	Turkish jobseekers residing in selected provinces, registered with İŞKUR and willing to participate in employment support programs will be eligible	Medium	Medium
Host community members	Host community members in SuTP hosting neighborhoods with high SuTP population density.	Host Community members feel discriminated when SuTP are targeted with special assistance by the NGOs and/or government based on the perception that they face similar socio-economic difficulties but have no access to such support. The inclusion of Turkish jobseekers in target group should reduce such feelings of favoritism.	High	High
Vulnerable groups	ESSN beneficiaries and Turkish citizens are more vulnerable, and so are women and youth, especially from female headed households or households with disabled members.	Project Beneficiaries will be selected from workable ESSN beneficiary lists and jobseekers registered with İŞKUR. Beneficiaries will be screened for their needs and employability status Vulnerable groups may be from both the migrant and host communities who will be among the project beneficiaries participating into the project. They may be illiterate or have different vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure.	High	Low
Employers in selected provinces	Turkish and SuTP employers residing in selected	Turkish and SuTP employers residing in selected provinces and registered with İŞKUR	High	High

	provinces will be eligible to benefit from the project	and willing to participate in employment support programs will be eligible.		
MoFLSS	Related General Directorates of MoFLSS	DGILF will receive coordination support and DG Social Assistance and other related general directorates will receive capacity building support	High	High
İŞKUR PDs and Service Centers	Program implementation: Provision of intermediation/ counseling services and employment support for SuTP and Turkish Citizens	İŞKUR will be supported to implement the program, strengthening its information systems for data exchange and outreach, and providing applied training programs targeting Turkish citizens and workable SuTP and employers.	High	High
TRC Community and Service Centers	Program implementation: TRC will pre-screen beneficiaries, and based on their needs, offer a menu of support services to the target group of beneficiaries and/or refer them to İŞKUR for further job-search assistance and placement onto ALMPs.	TRC will be supported to implement the program and to strengthen its information systems to facilitate data exchange, strengthen its outreach and programs to workable SuTP and Turkish citizens.	High	High

The Other Interested Parties (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 3. Other Interested Parties

Stakeholder	Description	Key Role	Significance Level	
			Interest	Influence
Steering Committee of the Project	Vice Presidency FRIT Office, MoFLSS (DGILF and DGSA), İŞKUR, TRC, WB and the EUD	Overall guidance and supervision on implementation	High	High
Municipalities	Some municipalities operate service/advisory centers to support SuTP inclusion	The project will coordinate with available municipality-run migrant support centers to link beneficiaries who need additional support.	Medium	Medium
DGMM	DGMM	Informing about the project's alignment with Turkey's harmonization strategy	Medium	Medium
Development Partners	UNHCR, ILO, IOM, UNDP, UNFPA, UNICEF, KFW provide various services and implement projects targeting migrants under protection. EU provides financing support to projects implemented by various government agencies for inclusion of asylum seekers.	The project will coordinate with development partners through existing coordination mechanisms.	Medium	Low
Service provider NGOs	Local and international NGOs legally permitted to operate in our country and acting in cooperation with public institutions are providing services such as vocational and technical skills training, entrepreneurship support, employment support, psycho-social support, etc.	The project will refer project beneficiaries requiring specific special needs, which are not covered or fully covered by CCs, to other service provider where applicable.	Low	Low

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.

Table showing potential future stakeholders is provided below.

Table 4. Future Other Interested Parties

Stakeholder	Description	Key Role	Significance Level	
			Interest	Influence
DAs	The DAs will implement the Social Entrepreneurship, Empowerment and Cohesion in Migrant and Host Communities Project which includes provision of capacity building and sub-grants to select migrants under protection and host communities.	Beneficiaries of the project might be referred to various projects. Implementing entities of various projects may include project beneficiaries in their activities.	Low	Low

5. STAKEHOLDER ENGAGEMENT PLAN

5.1. Stakeholder Engagement Methods to be used

TRC and İŞKUR will be the main implementing agencies for Component 1 and MoFLSS DGILF for Component 2. Each institution will undertake outreach and stakeholder engagement with the target groups based on their specific roles in the project.

The following methods will be used for the implementation of the SEP, in regards to MoFLSS and Ministry of Health's social distancing measures under the COVID 19 pandemic:

- (a) *Consultation Meetings.* Consultation meetings will be convened with stakeholders including, municipal authorities, provincial directorates of other line ministries, universities and chambers of commerce etc. In addition, consultation meetings will be held with stakeholders who are directly affected by the project on a regular basis. 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 e-mail, teleconference and videoconference, when needed.
- (b) *Information Desks.* CCs and İŞKUR PDs provide information to the local eligible beneficiaries (Turkish citizens and migrants) on stakeholder engagement and project activities. TRC Service Centers will provide livelihood advisory and referral services to ESSN beneficiaries through desk setup. Communication materials will be readily available at İŞKUR's offices and TRC Community and Service Centers in Turkish and Arabic.
- (c) *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. The websites of MoFLSS DGILF, İŞKUR and CCs 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.
- (d) *Social Media.* Social media accounts⁷ of CCs are available in various social media platforms. CC 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 in cooperation with İŞKUR and DGILF.
- (e) *Grievance Mechanism.* In compliance with the WB Stakeholder Engagement and Information Disclosure standard, MoFLSS, and İŞKUR will utilize the existing, common grievance and complaints mechanisms of the ongoing SPF project, which is the call center ALO 170 and CIMER. CCs will utilize their existing GRM. The GRMs are described in Section 7 of the SEP.

Special attention will be paid to vulnerable groups (notably women and youth) and their possible difficulties in accessing stakeholder engagement activities and utilization of above-mentioned methods. TRC staff are trained and sensitized in working with vulnerable people (see identification above). All arrangements will be made to make vulnerable people comfortable and feel free to express themselves. Vulnerable groups may be from both the

⁷ Community Center social media accounts can be reached at the username @KizilayTM.

migrant and host communities who will be among the project beneficiaries (in other words participating as “community/beneficiary” workers to the project. Those who are willing to engage in a work, may be illiterate or have different vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure. For disabled persons who want to engage in the project as a project beneficiary, the project will include measures for their accessibility and will have measures to match their skills with the labor demand. Depending on the disability circumstances, house visits or online channels may also be utilized as needed for information sharing purposes, especially under the pandemic circumstances as allowed by the project budget limitations.

Project stakeholders will be kept informed on project’s social performance, implementation of the SEP and the grievance mechanism using engagement mechanisms described in this SEP.

SEP will also allow monitoring of the performance of the WB in its role as intermediary (in terms of process management, communication, engagement and cooperation).

5.2. Overview of Stakeholder Engagement Plan

Table 5. Stakeholder Engagement Plan

Subgroup	Project Phase	Engagement Mechanism	Communication Channels & Materials	Purpose	Venue	Frequency	Responsible Party
PAP							
SuTP jobseekers in selected provinces	Preparation, Implementation, Completion	Consultation meetings, focus group discussions, implementation support, 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	TACs, CCs, İŞKUR provincial offices	Individual interaction and other engagements on needs basis	TRC and İŞKUR PIUs in partnership
Women Migrants and SuTP in selected provinces	Preparation, implementation, completion	Consultation meetings, focus group discussions, implementation support, 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	TACs, CCs, İŞKUR provincial offices	Individual interaction and other engagements on needs basis	TRC and İŞKUR PIUs in partnership
Turkish Jobseekers	Preparation, implementation, completion	Consultation meetings, focus group discussions, implementation support, M&E visits, BSS, GRM.	Kiosks, complaints box, social media, leaflets, posters, brochures, hand-outs (Relevant materials will be available in Turkish).	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	İŞKUR Service Centers, CCs	Individual interaction and other engagements on needs basis	İŞKUR PIU
Host community members	Preparation, implementation, completion	Consultation meetings, focus group discussions, implementation support, M&E visits, BSS, GRM.	Kiosks, complaints box, social media, leaflets, posters, brochures, handouts (Relevant materials will be available in Turkish).	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	İŞKUR Service Centers	As needed	İŞKUR
Vulnerable Groups	Preparation, implementation, completion	Online consultation meetings, phone calls, text messages, focus group discussions, implementation	Kiosks, complaints box, social media, text messages, leaflets, posters, brochures, hand-outs (Relevant materials will be available in Arabic also accessible to people with disabilities).	Increase effectiveness as well as meet the inclusion targets of the Project. The national legislation has quota and special measures to support youth, women employment as well as people with disabilities.	TACs, CCs, İŞKUR provincial offices	Individual interaction and other engagements on needs basis	TRC and İŞKUR PIUs in partnership

		support, M&E visits, BSS, GRM.		These measures will also be sought for the vulnerable groups.			
Employers (Turkish and SuTP) in selected provinces	Preparation, implementation	GRM, consultation meetings	Kiosks, complaint box, social media, leaflets, posters, brochures, handouts (Relevant materials will be available in Turkish and Arabic).	Increasing the effectiveness of the project; Appraising target beneficiaries of potential social risks; Ensuring timely intervention to respond to unintended outcomes	İŞKUR Service Centers	As needed	İŞKUR PIU
OIP							
DGMM	Preparation, implementation, completion	Coordination meetings, implementation support visits	Telephone, E-mail, 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	As needed	MoFLSS PIU
Development Partners	Preparation, implementation, completion	Coordination meetings	Telephone, E-mail, 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	MoFLSS PIU

6. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT

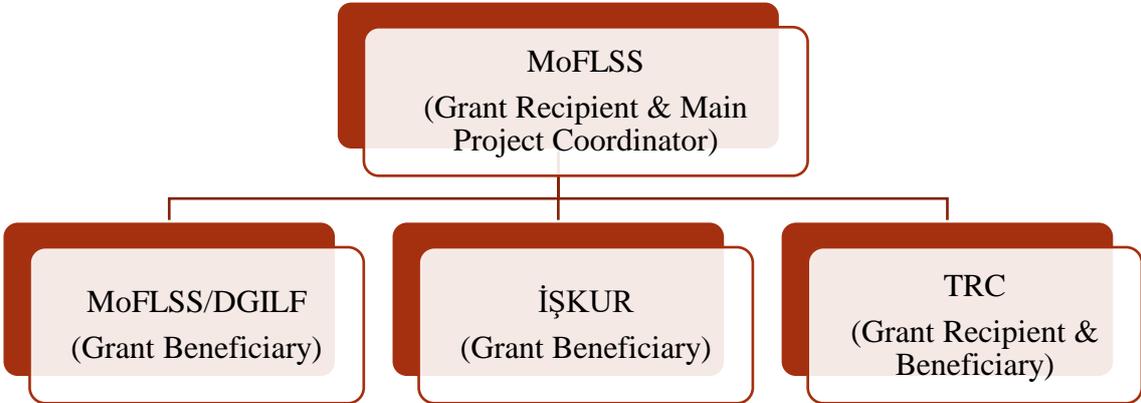
6.1. Implementation Arrangements

MoFLSS holds the status of “Recipient” of Grant and Main Coordinator (Project Coordinator)” of the Project which is funded by the European Union within the framework of FRIT. In this context, MoFLSS will monitor and coordinate the agencies in charge of various components of the project as well as their operations, and maintain communication with the EU, as the donor, and the WB as the intermediary. These functions will be executed through DGILF and DGILF Project Implementation Unit (PIU) will act as the contact point. The MoFLSS-DGILF PIU will ensure coordination with İŞKUR and TRC PIUs, i.e., in terms of social and environmental requirements, and joint communication and outreach activities, including SEP. The aim is to ensure adequate communication of the available services and products offered under the program particularly for ESSN beneficiaries to ensure wide dissemination and to dispel any misinformation, as well as for the SEP.

İŞKUR have relevant prior experiences from an ongoing WB-funded project providing employment services, and TRC’s existing work with SuTP communities comprises consultation meetings with refugee and host community members, Provincial Directorate of Migration and other local government authorities, conducting beneficiary satisfaction surveys, information desks at the TRC Community and Service Centers, Communication Materials, Complaints and Response Mechanism, and advisory committee consisting both SuTP and host community members. A program communication strategy that will target the broader public will also be developed. İŞKUR PDs and CCs in project provinces will be responsible for day-to-day implementation and coordination and will collaborate in joint stakeholder engagement activities.

Stakeholders could also be categorized as provincial level and national stakeholders. Regarding the national stakeholders, MoFLSS-DGILF PIU will directly be involved in the engagement activities and make necessary arrangements to conduct each activity. 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 1. Project Structure (MoFLSS-DGILF PIU, İŞKUR PIU and TRC PIU)



6.2. Roles and Responsibilities

The MoFLSS-DGILF PIU, İŞKUR PIU and TRC PIU will have joint responsibility for the stakeholder engagement activities detailed in this SEP as detailed in Table 8 above.

Roles and responsibilities are summarized below:

Table 6. Stakeholder Responsibilities

Key Stakeholder	Responsibilities
MoFLSS-DGILF PIU	<ul style="list-style-type: none"> • Planning and implementation of the SEP in coordination with other PIUs • Ensure overall project coordination among key institutions particularly including İŞKUR PIU, TRC PIU and DGSA • Overall coordination of the project implementation and reporting to the Steering Committee. • Management and resolution of grievances • Ensure the quality of the services offered to beneficiaries by İŞKUR and TRC • Follow up and coordinate the responsibilities arising from the Grant Agreement and the Subsidiary Agreements to be signed with other project stakeholders under the Grant Agreement.
İŞKUR PIU	<ul style="list-style-type: none"> • Planning and implementation of the SEP in coordination with other PIUs • Coordination between key stakeholder, primarily including DGSA • Monitoring and reporting of the project to MoFLSS-DGILF • Management and resolution of grievances • Ensures the quality of the services offered to beneficiaries • Timely delivery of the services and project • Fulfill other duties and responsibilities arising from the Grant Agreement and the Subsidiary Agreements to be signed with other project stakeholders under the Grant Agreement
TRC PIU (Community Based Migration Programs)	<ul style="list-style-type: none"> • Planning and implementation of the SEP in coordination with other PIUs • Management and resolution of grievances jointly with MoFLSS and İŞKUR • Coordination between key stakeholders, primarily including DGSA • Monitoring and reporting of the project to MoFLSS-DGILF • Ensures the quality of the services offered to beneficiaries • Timely delivery of the services and project
PAP	<ul style="list-style-type: none"> • Pass eligibility screening for enrollment in project • Enter their grievances using GRM defined in the SEP

6.3. Information Disclosure

MoFLSS-DGILF, İŞKUR and TRC PIUs will utilize their existing online communication channels. These include TRC's official Community Centers website⁸ and social media channels⁹, and media for disclosure of written/print/visual materials. Project updates will be posted on MoFLSS, İŞKUR and TRC websites and be available in relevant facilities (i.e., İŞKUR's PDs, CCs, etc.). An easy-to-understand guide to the terminology used in reports,

⁸ The website is available in Turkish, Arabic and English: <http://www.kizilaytoplummerkezleri.org/tr>

⁹ 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>

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.

6.4. Monitoring and Reporting of the SEP

Monitoring and evaluation of the stakeholder process is considered vital to ensure that the implementing entities are 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/activities will assist in achieving successful engagement:

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

The project will monitor the SEP during the implementation, including reviewing the functioning of the GRM and types of grievances recorded. This will work as a feedback loop on the project and facilitate adjustments/improvements to be made during engagement. At completion of SEP activities, a review of outputs will be conducted in order 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.

The PIUs will ensure that records of stakeholder engagement activities are kept in the database. In addition, GRM activities will be reflected in the project progress reports prepared semi-annually.

Stakeholder engagement activities will be periodically evaluated by the MoFLSS-DGILF. MoFLSS-DGILF will ensure that all consultation and disclosure activities are recorded adequately. SEP implementation will be reported in semi-annually 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 semi-annual and longer-term plans.

7. GRIEVANCE REDRESS MECHANISM (GRM)

7.1. Overview of Complaints and Response Mechanism

The implementing entities (MoFLSS-DGILF, İŞKUR and TRC) have pre-existing GRMs. The MoFLSS and İŞKUR will utilize İŞKUR's existing GRM to resolve and administer grievances that could be encountered during the implementation of the project as well as to address other social issues pertaining to social cohesion and inclusion once the programs are operational. The rationale is to (a) have a GRM which is accessible by all project beneficiaries; and (b) ensure that the project beneficiaries know where to submit their feedback or complaints. TRC will be using its own GRM for this project. Complaints regarding the WB in relation to process management, communication, engagement, cooperation and similar areas, which will be conveyed through these mechanisms and/or different channels will be processed by the Project Coordinator. In this framework, the WB will be responsible for defining, adjusting, operating and reporting its own GRM. The WB will be responsible for reporting the complaints and feedback received through its own GRM to MoFLSS-DGILF and the related PIU regularly and within 5 working days after date of receipt.

The project-based GRMs are intended to serve the following purposes:

- Allow for the identification and impartial, timely and effective resolution of issues affecting the project;
- 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 GRM in place will also serve the objectives of: reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

7.2. MoFLSS and İŞKUR GRM Overview & Structure

The rationale for the MoFLSS and İŞKUR GRM is to (a) have a GRM which is accessible by all project beneficiaries; and (b) ensure that the project beneficiaries know where to submit their feedback or complaints. The MoFLSS and İŞKUR will provide the project beneficiaries with information on communication liaison officers as well as the GRM. İŞKUR will address all project-related applications, feedback, and complaints through the MoFLSS's existing call center known as 'ALO 170'. ALO 170 Family, Labour and Social Services Communication Center, for which the workflow is shared below, has been established in 2010. It also has a website available (www.alo170.gov.tr).

- *Who can communicate grievances and provide feedback?* The GRM will be accessible to all project beneficiaries and other project stakeholders who are likely to be affected directly or indirectly by the project. Turkish citizens residing in selected localities may have concerns that the current İŞKUR programs are becoming less available and accessible to them. The GRM will allow SuTP to express their concerns and requests as well. To be able to facilitate the needs of both communities, the GRM should be open and accessible to both communities.
- *What types of grievance/feedback will this GRM address?* The call center will address all sorts of notifications, applications, complaints, feedback, and so on related to work

life and social security. The GRM can thus be used to submit complaints, feedback, queries, suggestions or compliments related to the overall management and implementation of the project, including: Grievances that may arise from persons who are dissatisfied with the eligibility criteria, project activities, or actual implementation of the project by MoFLSS and İŞKUR.

- Violation of Project policies, guidelines, or procedures, including those related to health and safety of community and contracted employees, child and young labor and gender-based violence.
- General feedback, questions, suggestions, compliments.
- Labor complaints will be handled by the various labor GRMs, as set out in the LMP.

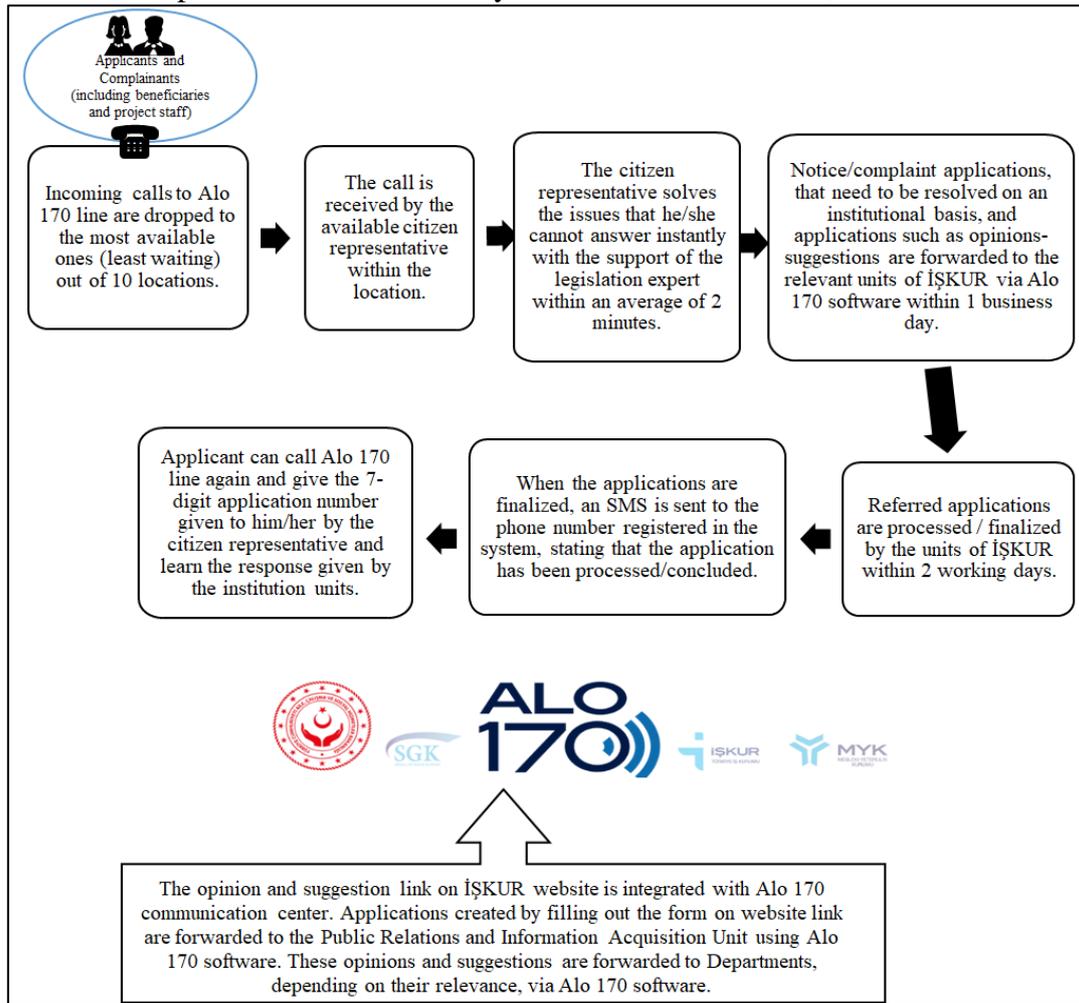


Figure 2. Flowchart of ALO 170¹⁰

Standards. The ALO 170 is providing services 24x7 in English, Arabic and German as well as Turkish and all applications to the call center are logged.

Structure. The structure and other details of the GRM will be described in the Project Operational Manual (POM).

Appeals Mechanism. If the complaint is still not resolved, the complainant may resort to national authorities for judicial procedure in line with national legislation (Please see Section 2.1).

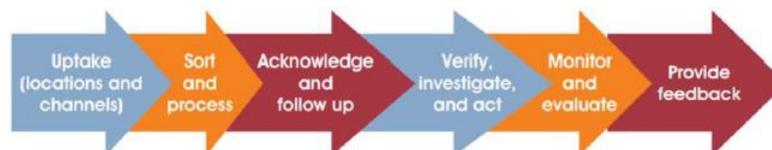
¹⁰ This unique flow applies to project workers, Turkish citizens and SuTP.

7.3. MoFLSS and İŞKUR GRM Communication & Process

Communication. Information about the project’s GRM will be included in progress report of the project prepared semi-annually. Also, relevant stakeholders will be informed about GRM activities if necessary. Informative brochure about the GRM will be prepared.

Process. The overall process for the GRM will be described in detail in the Project Operations Manual comprised of 6 steps: (1) uptake (2) sorting and processing (3) acknowledgment and follow up (4) verification, investigation and action (5) monitoring and evaluation and (6) feedback (see figure 2).

Figure 2. Feedback and GRM Process



Source: Agarwal, Sanjay and Post, David. 2009. *Feedback Matters:*

Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects – Part I. SDV. World Bank.

Step 1: Uptake. Project stakeholders will have the opportunity to provide feedback and report complaints through dedicated hotline and project website.

Step 2: Sorting and Processing. To consolidate, monitor and report on information related to grievances, complaints and feedback related to the project will be documented upon receipt/communication, and recorded in the central GRM database at MoFLSS, where the grievance and its resolution will be recorded to facilitate feedback regarding project design and analysis of grievances and functionality of the GRM.

Step 3: Acknowledgement and Follow-Up. The ALO 170 is providing services 24x7 and all applications to the call center are logged.

Step 4: Verification, Investigation & Action. Verification and investigation involve gathering information about the grievance to determine its validity and to generate a clear picture of the circumstances surrounding the issue under consideration. ALO 170 is committed to evaluate and process the grievance within legal timeframe.

Step 5: Monitoring & Evaluation. Monitoring refers to the process of tracking grievances and assessing the extent to which progress is being made to resolve them. Ultimately, the PIUs will be responsible for consolidating, monitoring and reporting on the total number of complaints, enquiries and other feedback for the project that has been received, resolved and that is pending, as well as feedback pertaining to the PIU. All this data will be compiled by the MoFLSS-DGILF for reporting at the end of every month.

Step 6: Providing Feedback. This step entails informing GRM users and the public at large about the results of investigations and the actions taken. The PIU will prepare semi-annually reports on the implementation of the Project GRM. In addition, data on grievances will be made available to World Bank missions if requested.

7.4. MoFLSS and İŞKUR Grievance Logs

The Grievance Focal Points of MoFLSS will maintain a central grievance database, ensuring that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed.

7.5. MoFLSS and İŞKUR Monitoring and Reporting on Grievances

The MoFLSS PIU's GRM focal point who will be the Communications and Stakeholder Specialist will be responsible for:

- Analyzing the qualitative data on the number, substance and status of complaints;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting semi-annually reports on GRM mechanisms to the Project Coordinator at the PIU.

Semi-annual progress reports will include a section related to GRM which provides updated information on the following:

- Status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on number of received grievances \ (applications, suggestions, complaints, requests, positive feedback), highlighting those grievances related to the WB ESS on Involuntary Resettlement and number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
- Level of satisfaction by the measures (response) taken;
- Any correction measures taken.

7.6. Turkish Red Crescent's GRM Overview and Structure

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.

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.¹¹

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.

In addition to delivering timely and accurate information, maintaining a two-way communication with communities is important to ensure that the needs, complaints and

¹¹ TRC. 2019. Community Based Migration Program Complaints and Response Mechanism Protocols.

suggestions of project 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.

7.6.1. Who Can Submit Feedback or Complaint?

Any individual could share feedback or a complaint, including (i) Directly involved in the activities carried out by CCs, and (ii) indirectly affected by the activities of the CCs. 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.

7.6.2. Channels and Methods

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 Community Center's 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

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 Kizil 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 Pashto). 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 (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.

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

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. The World Bank will only be informed about the grievances communicated in provinces / centers / activities covered by this project. TRC will use its own grievance form which is 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.

Roles and responsibilities of various TRC staff and protocols of TRC CRM are explained in detail in TRC CRM Protocols document. TRC GRM will share its monthly overview of different types of grievances received, resolved and pending with MoFLSS PIU.

In addition to TRC's own grievance mechanism, beneficiaries and stakeholders can register complaints and grievance to the MoFLSS/İŞKUR's GRM via the ALO 170 hotline, regular mail, email or website (see above).

7.7. Handling Sensitive Grievances

Handling grievances that are sensitive (such as related to harassment, sexual exploitation and abuse/sexual harassment (SEA/SH) at workplace) will be treated in full confidentiality and national referral system will be followed. Turkey has already a national referral system for GBV, not only domestic violence but also workplace related harassment, bullying, violence as well as SEA/SH at workplace, which all institutions and companies are following. These are under the auspices of Ministry of Family, Labour and Social Services and already detailed in both the Turkish Labor code and Turkish Penal code, where unacceptable behaviors are explained, and relevant penalties are detailed. Psychosocial support is already provided and available for women and girls who may be affected by the outbreak and are also GBV survivors. The GRM that will be utilized for the project will also be used for addressing SEA/SH issues at workplace and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues.

When such sensitive grievances are recorded, the Bank will be notified as well as the Project Manager, Field Coordinator, Safeguard Specialist and Communication Specialist, HR Manager as appropriate, shall be responsible for taking appropriate action in cases in which there is reason to believe that any right has been violated.

The MoFLSS PIU's GRM focal point will be responsible also for:

- Analyzing the qualitative data on the number, substance and status of complaints;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting semi-annually reports on GRM mechanisms to the Project Coordinator.
- For those sensitive grievances that need to follow the national referral system, will not be resolved by the GRM focal point only confidentially recorded and forwarded to the relevant authorities as defined in the Turkish Labor and Penal Code.

In Turkish Red Crescent, for sensitive complaints, BRO (Beneficiary Relations Officer) will record the complaint in the questionnaire in the tablet. Sensitive complaints about TRCS staff/volunteer (e.g. sexual exploitation abuse, fraud, corruption, misconduct) will be referred to the CEA focal point in TRCS office in Ankara HQ for investigation, follow up and response. The CEA focal point in Ankara will receive automatic notifications and will respond to the cases by liaising with Deputy Operational Coordinator/HR. CEA focal point will document the response in the questionnaire and contact the complainant to inform decision. Sensitive complaints about a community member or staff of another organization (e.g. sexual exploitation and abuse) will be referred to Protection Officer in the CC. It will not be a responsibility of the BRO to investigate or provide a response, due to the sensitive nature of the issue and the specialist training and knowledge required

7.8 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a 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 WB's attention, and Bank Management has been given an opportunity to respond.¹²

The WB will be responsible for reporting the complaints and positive or negative feedback submitted in relation to itself, the individuals employed by the WB at the project level and other staff working on this project, by the individuals or institutions who are not among the project implementing parties but are counterparts in project related activities in which the WB is directly or indirectly involved through its own GRS to the Project Coordinator. Such feedbacks will be reported to the Project Coordinator directly or through the grievance redress mechanisms defined in this document.

¹² For information on how to submit complaints to the World Bank's corporate 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.

8. BUDGET

The budget for the SEP is estimated around 800.000 EUR (1% of total project budget).

ANNEXES

Annex 1: Sample Grievance Form and Grievance Closeout Form

GRIEVANCE FORM			
Name of person receiving grievance:		Date:	
Title:			
INFORMATION ABOUT COMPLAINANT		Ways of Receiving Grievance	
<i>(This section may not be filled if the complainant wishes to remain anonymous)</i>			
Name – Surname		Phone	<input type="checkbox"/>
Phone number		Information Meetings	<input type="checkbox"/>
Address		Application to Office	<input type="checkbox"/>
District/Neighborhood		Mail/e-mail	<input type="checkbox"/>
Signature (if possible)		Field visit	<input type="checkbox"/>
		Other:	<input type="checkbox"/>
DETAILS OF GRIEVANCE			

GRIEVANCE CLOSEOUT FORM			
ASSESSMENT OF THE GRIEVANCE			
Corrective Required:	Action	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	Please describe the action if it is required to close-out the case		
RESULT			
CLOSEOUT			
<i>This part will be filled in and signed by the complainant and the complaint evaluation committee when the corrective action or file is closed-out. (Instead of taking the signature of the complainant, receipt or other supplementary documents can be attached to the form in order to verify that the file has been closed-out.)</i>			
Responsible Person		Complainant	
Name-Surname		Name-Surname	
Date and Signature		Date and Signature (If possible)	

Annex 2: List of Participants

Public Institutions

- Ministry of Interior-Directorate General for Migration Management
- Ministry of Interior-Disaster and Emergency Management Presidency
- Ministry of Education
- Ministry of Industry and Technology
- Union of Municipalities of Turkey
- Chambers of Trade and Industry of 8 project provinces
- Development Agencies of 8 project provinces

International Organizations

- European Union Delegation to Turkey (EUD)
- The Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ)
- International Centre for Migration Policy Development (ICMPD)
- International Federation of Red Cross and Red Crescent Societies (IFRC)
- International Labour Organization (ILO)
- International Organization for Migration (IOM)
- United Nations Population Fund (UNFPA)
- United Nations Development Programme (UNDP)
- United Nations High Commissioner for Refugees (UNHCR)
- United Nations International Children's Emergency Fund (UNICEF)

Other Institutions

- The Union of Chambers and Commodity Exchanges of Turkey (TOBB)
- Confederation of Tradesmen and Artisans of Turkey (TESK)
- Turkish Confederation of Employer Associations (TİSK)
- Confederation of Turkish Trade Unions (TÜRK-İŞ)
- HAK-IS Trade Union Confederation (HAK-İŞ)
- Confederation of Progressive Trade Unions of Turkey (DİSK)

Annex 3: Summary of Consultations

OPINIONS/FEEDBACKS	RESPONSES
<p>On-the-job training is thought to be more effective in the process of adapting migrants to the labor market. In this sense, we recommend that the applied training content mentioned in the project include a wide range of practical trainings and should also be aimed at gaining work experience.</p>	<p>Within the scope of the project, job and vocational counseling services and Applied Training Programs offered by İŞKUR will support participants' transition to the labor market.</p>
<p>At the point of meeting the workforce needed in the local area with the employer, it was considered important to organize programs related to defined sectors and firms and the sector selection methods.</p>	<p>The existing mechanisms, especially the Provincial Employment and Vocational Training Boards and Labor Market Research, will continue within the scope of the project to ensure that the courses and programs organized by İŞKUR are compatible with the local labor market.</p>
<p>At the point of meeting the employees with the employers, it is recommended to improve the current processes of İŞKUR and to restructure the processes in a way to meet the employer's expectations.</p>	<p>The mechanisms currently in place to ensure that the courses and programs organized by İŞKUR are compatible with the needs of the local labor market and employers will be continued within the scope of the project. In addition, activities aimed at increasing the institutional capacities of İŞKUR Provincial Directorates will be carried out within the scope of the project.</p>
<p>It is thought that it would be beneficial to include private sector representatives and vocational training centers in the project provinces among the stakeholders of the project.</p>	<p>Courses and programs of İŞKUR are organized in cooperation with employers and vocational training institutions based on the needs of the local labor market and employers. However, it is envisaged that local information meetings will be held, as in the FRIT 1 process, in order to increase the participation of local stakeholders in the processes.</p>

<p>The studies on the professions that will emerge in each sector with the effect of digitalization and the subject of future jobs should be the focus of the project.</p>	<p>İŞKUR periodically conducts studies to determine the needs of the labor market, and within the scope of the project, the dynamics and sustainability of the labor market will be taken into consideration in the studies to be supported and active labor market programs will continue to be supported in needed areas.</p>
<p>It would be beneficial to identify occupations with high employment opportunities in the project provinces and to determine these occupations according to the National Qualifications approved by the Vocational Qualifications Authority (VQA) and to direct the beneficiaries to obtain VQA Vocational Qualification Certificate.</p>	<p>In order to take the Vocational Qualification Certificate from the institutions authorized by VQA, it is necessary to attend the trainings defined in different periods according to the professions. However, within the scope of the project, instead of theoretical vocational training, practical training programs will be focused. In this context, the occupations in which the programs will be opened will be determined at the local level in line with the needs of the labor market.</p>
<p>In order to encourage women's employment, it would be beneficial to allocate a certain quota for women among all beneficiaries and to provide nursery and similar child care areas and services in vocational training facilities.</p>	<p>As in the scope of FRIT 1, within the scope of the project, women and young people are encouraged to benefit from the programs primarily, within this scope, specific targets are defined for women and youth.</p>
<p>Orientation trainings are provided to each individual participating in the working life to ensure a long stay in the employment market, while the unemployed can access new job opportunities. Accordingly, it would be beneficial to include guidance services in the applied training programs to be provided within the scope of the project.</p>	<p>In the stage of supporting the transition to the labor market, basic life skills as well as job readiness training will be provided to the project beneficiaries. Job and vocational counseling services will also be provided by İŞKUR prior to applied training programs and job orientation services to the beneficiaries.</p>

<p>It is seen that there will be training for work readiness and life skills for asylum seekers. Carrying out similar trainings or awareness-raising activities in companies where asylum seekers are placed in jobs will contribute to support social cohesion and prevent conflicts that may arise from cultural differences or prejudices among employees.</p>	<p>Visibility, information and communication activities for employers are planned within the scope of the project.</p>
<p>It is considered that activities to raise awareness of the project beneficiaries in social security and union organizations will be appropriate.</p>	<p>In this context, the project beneficiaries will be provided with basic life skills as well as job readiness trainings in the stage of supporting the transition to the labor market.</p>
<p>It is predicted that facilitating work permits will enable more people to be employed. In this context, it is beneficial to put forward strategies on how to improve the work permit application, acceptance and renewal processes for SuTP and international protection applicants in the project.</p>	<p>Different steps have been taken in the past process towards facilitating the work permit application process, and it continues to be taken. Within the scope of the project, it is aimed to develop the work permit application system infrastructure, and activities have been planned within this scope. In addition, it is planned to cover the Work Permit Fees of the beneficiaries who will be employed after the Applied Training Programs offered by İŞKUR.</p>
<p>Communication with the public for the promotion and dissemination of the mechanisms established to associate the Turkish Red Crescent with İŞKUR is of great importance for the effectiveness of the project.</p>	<p>With the project, cooperation is planned in the mechanism to be established between Turkish Red Crescent and İŞKUR in determining and preparing the persons who will enter the labor market. In addition, communication strategies with the target audience are also prepared.</p>
<p>In order to prevent the social exclusion of the project beneficiaries and to accelerate their transition to the labor market, it is of vital importance to organize language courses that will teach them Turkish at a minimum level of A1 or A2. It is extremely important that the project activities will serve the transition of</p>	<p>Language trainings are given by Turkish instructors to prepare the project beneficiaries for working life. The course level varies between A1-C2. In addition, Turkish courses will specialize based on sectors within the scope of on vocational and professional Turkish. Special trainings will</p>

<p>the beneficiaries to the labor market and facilitate their registered employment and their transition to employment through new and innovative trainings (language training, social skills development training, etc.).</p>	<p>be provided for the sectors in which the beneficiaries can work. In addition, in order to facilitate the access of beneficiaries to the labor market and to support their continuity in employment; Social Skills Development Trainings such as Work and Culture in Turkey, the Labor Law in Turkey and Social Rights, CV Preparation and Readiness to Job Interview, Job Search Process in Turkey, Business Discipline, Time Management, Stress Management, Relationships - Conflict Management, The Importance of Communication and Teamwork, Working with Different Cultures, First Aid, etc. are planned in the modules.</p>
<p>It will be an important gain both for the economy and for the target group if the beneficiaries of social assistance, who are close to the labor market, are supported for their exit from the program.</p>	<p>Beneficiaries of social assistance programs are also among the targeted population within the scope of the project.</p>
<p>In the process of exit from the ESSN Program and access to livelihoods, it would be appropriate to support particularly vulnerable individuals and families and, if possible, implement a gradual exit strategy.</p>	<p>Project partners also agree on maintaining these sensitivities.</p>
<p>In the project provinces, different institutions (UN Organizations, Non-Governmental Organizations) provide vocational training, job placement services, etc. within the framework of similar partnerships. may be performing activities. In this context, with the coordination role of the Ministry at the local level, monitoring the activities of all stakeholders will prevent duplication. In addition, the same people are prevented from being supported in similar or even the same programs in more than one project.</p>	<p>Although this proposal was determined by the parties as an important need, it will be aimed to increase the communication and cooperation at the local and central level as in the FRIT 1 process, and to implement the different activities carried out in the field in a complementary manner.</p>

<p>Participating in 3RP Livelihoods Sector Coordination Meetings and informing about the project will facilitate the process of directing potential beneficiaries to project services and will help other institutions operating in the sector to plan.</p>	<p>Information about the project was given at the 3RP Livelihoods Sector Working Group 2020 July meeting.</p>
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