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SOCIAL ENTREPRENEURSHIP, EMPOWERMENT AND COHESION IN REFUGEE AND HOST COMMUNITIES IN TURKEY PROJECT

STAKEHOLDER ENGAGEMENT PLAN

24 July 2023



DIRECTORATE GENERAL OF
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REVISION HISTORY

Version Date	Remarks
24 October 2019	This version of the SEP is approved by the World Bank for disclosure as a draft SEP
28 November 2019	The following revisions are made: (i) Project Affected Parties to clarify the description of vulnerable groups; (ii) GRM to receive SEA/SHE in Section 7; (iii) Summary of Consultations in Section 3.1 ; (iv) ESF requirement on information disclosure added to confirm availability of information in relevant languages (Section 6.2 Information Disclosure).
13 August 2020	The following revisions were made: (i) COVID-19 related risks and measures for stakeholder consultations throughout the project implementation were embedded in relevant sections. (ii) additional vulnerability assessments and measures are added after the beneficiary dialogues/assessment was completed during appraisal.
25 January 2021	The following revisions were made (i)Feedbacks from the consultation meeting held at 25.01.2021 are included.
18 November 2022	The SEP was updated to cover the preparation of the GM Manual and GBV Action Plan within the scope of the project.

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.

Local 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.)

Community Implementing Partners: Refers to local community-based, and non-governmental organizations, foundations or a consortium of such entities with private service providers that have sound knowledge of and access into communities through trusting relationships and will deliver a holistic set of services to both refugees and host communities.

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.



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Project: Refers to Social Entrepreneurship, Empowerment and Cohesion Project, which is funded under the European Union Commission's Facility for Refugees in Turkey (FRIT).

Project Area: A geographical area within which direct and indirect impacts attributable to a project can be expected. Typically, a Project Area is (i) unique to a project (ii) larger than the actual footprint of a project; and encompasses socio-economic issues and impacts, as well as issues and impacts associated with other disciplines (e.g. environment, health and safety). Defining the Project Area is used to determine a project's area of influence and responsibilities. It also provides guidance on the area within which impacts need to be monitored, and managed, and it also assists with defining project stakeholders that should be engaged during an environmental and social assessment process.

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*).

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. It includes both state and non-state actors.



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ABBREVIATIONS

CIP	Community Implementing Partner
CSO	Civil Society Organization
DA	Development Agency
DGMM	Directorate General for Migration Management
ESMF	Environmental and Social Management Framework
ESSN	Emergency Social Safety Net
FRIT	EU Facility for Refugees in Turkey
GM	Grievance Mechanism
GT	Government of Turkey
EU	European Union
EUD	European Union Delegation to Turkey
M&E	Monitoring and Evaluation
MoIT	Ministry of Industry and Technology
NGO	Non-Governmental Organization
PIU	Project Implementing Unit
SEECO	Social Entrepreneurship, Empowerment and Cohesion Project
SEP	Stakeholder Engagement Plan
SGM	Sub-Grant Manual
TRC	Turkish Red Crescent
UN	United Nations
UNHCR	United Nations Higher Commission for Refugees
WB	World Bank



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1. INTRODUCTION

Turkey is both a transit and reception country for migrants and refugees and hosts the highest number of refugees in the world. Turkey is hosting more than 3.6 million Syrians, who are under temporary protection, in addition to an estimated 400,000 asylum seekers and refugees from other nationalities. Turkish society has demonstrated resilience and innovation in the way it has absorbed displaced Syrians. Turkey has adopted a developmental approach to forced displacement, pursuing policies that have granted displaced Syrians access to services and to the labor market.

In 2016, Turkey established the Emergency Social Safety Net (ESSN) program to address the basic needs of its refugee population, with financial support from the European Union's Facility for Refugees in Turkey (FRIT) through its humanitarian arm, the Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG-ECHO). As of March 2019, at a cost of 998 million EUR, more than 1.5 million displaced Syrians had benefited from this multi-purpose cash transfer program providing monthly assistance through debit cards to the most vulnerable refugees in Turkey. While the ESSN program has supported Syrians through a critical transitional stage, a major constraint of this program is its limited sustainability in ensuring that ESSN beneficiaries continue to use the skills and benefits that they have acquired to maintain and improve their economic self-reliance. The Government of Turkey has planned to phase out the ESSN in order to move toward more developmental approaches that help refugees pursue an independent socio-economic life in Turkey.

The ESSN exit strategy calls for a focus on adopting comprehensive support programs that assist both host communities and refugees, and which proposes inclusive business and employment models that link refugees to economic opportunities to build self-reliance and strengthen their resilience. However, there are several barriers to sustainable employment for refugees and host communities. By March 2019, only 31,185 Syrians had received work permits.¹ The low number of work permits issued is considered indicative of the information, language, and skills barriers facing the refugees. The result is that more than two thirds of Syrian households are unable to rely on predictable job opportunities and those who work in the informal sector may face exploitation and poor working conditions.² Women refugees are particularly disadvantaged, often placing their children at greater risk.³

Despite the highly responsive efforts of the Turkish government, there are also emerging concerns regarding social cohesion in a number of affected communities. In 2017 and 2018, measures of social cohesion in Turkey within communities hosting Syrians revealed declines in trust, acceptance, and

¹ Ministry of Family, Labor and Social Services (MoFLSS).

² Inter-Agency Coordination Turkey. Regional Refugee Resilience Plan 2019-2020 Turkey Chapter. 2018. Outcome Monitoring Report.

³ World Bank. 2017. 'Syrians' Employment Opportunities and Challenges in Turkey'. *Qualitative Assessment (unpublished)*.



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belonging, with some variance for location. Factors contributing to these tensions include the protracted nature of the displacement crisis, the decreasing likelihood of near-term return, declining economic performance within Turkey, enduring cultural and social distance between each community, and the broader regional political volatility. Perceptions that Syrians outcompete hosts for low-wage jobs and are pushing rents up, perceived violations of social norms by displaced communities, and perceived preferential access to public services and assistance for Syrians have also contributed to deteriorating social cohesion in host areas.

1.1 About the Project

The project development objective is to improve women's livelihoods and social cohesion for refugees and host communities in target areas in Turkey. Its beneficiaries will include refugees and host community members in provinces with high numbers of ESSN beneficiaries, with a special emphasis on female beneficiaries. Institutional beneficiaries will include MoIT, participating Development Agencies and local public bodies, primarily those with high refugee populations. Non-governmental organizations familiar with target communities will also benefit from their role in implementation.

The project provinces (and relevant development agencies) are Adana (Cukurova), Mersin (Cukurova), Gaziantep (Silkroad), Adıyaman (Silkroad), Kilis (Silkroad), Mardin (Tigris), Hatay (East Mediterranean), Osmaniye (East Mediterranean), Kahramanmaraş (East Mediterranean), Diyarbakır (Karacadag) and Şanlıurfa (Karacadag) as depicted below.

Figure 1: Proposed Target Provinces and Development Agencies



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Table 1: Refugees by Province and by Share to total Population

Province	Number of Syrian Refugees August 2019	Share of Refugees to Total Population (%)
Adana	240,870	10.85
Mersin	201,291	11.09
Gaziantep	443,290	21.85
Adıyaman	24,951	4.00
Kilis	116,037	81.41
Mardin	87,217	10,52
Hatay	429,923	26.67
Osmaniye	49,254	9.22
Kahramanmaraş	89,553	7.82
Diyarbakır	33,389	1.93
Şanlıurfa	430,537	21.15

Source: Ministry of Interior, Directorate General of Migration Management

The project will be implemented through three components, as described in Figure 2.

Figure 2. Project Diagram



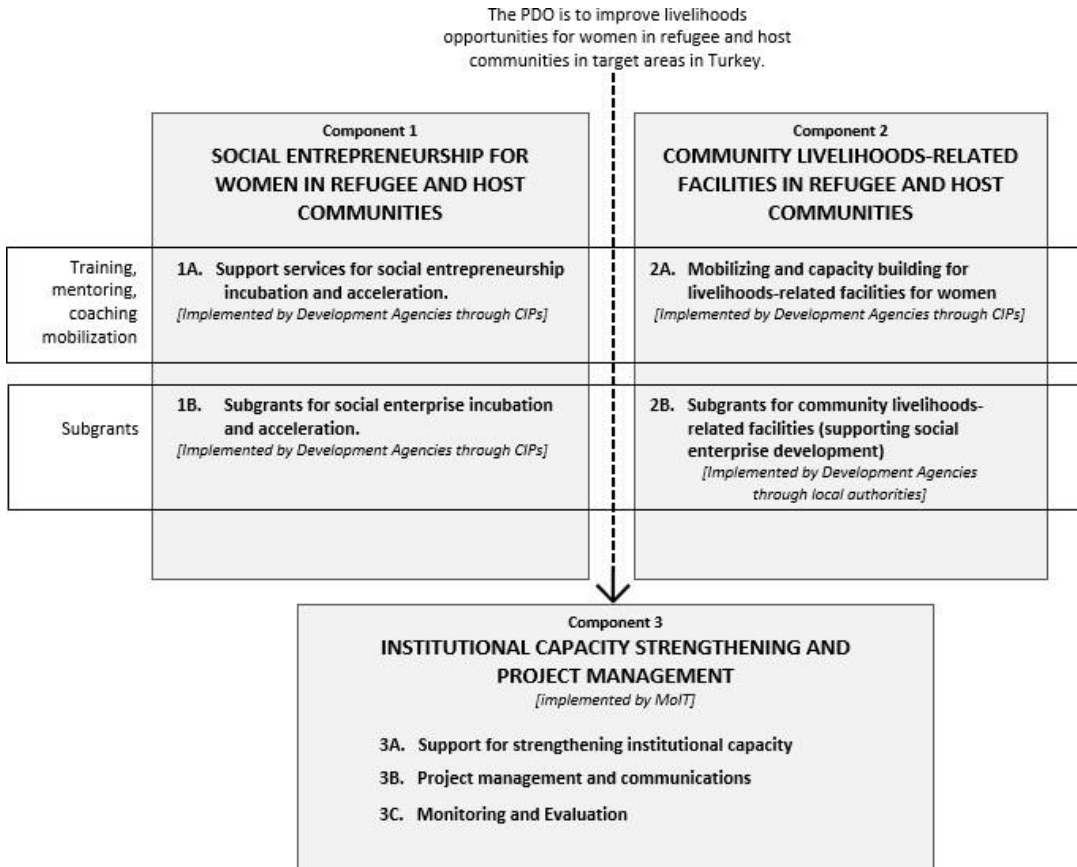
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Component 1: Social Entrepreneurship for Women in Refugee and Host Communities

Component 1 will finance activities to support social entrepreneurship in refugee and host communities in the selected target provinces abovementioned. This component will directly benefit those receiving start-up support services, subgrants and employment in social enterprises; indirect beneficiaries are the buyers of goods and users of services provided by the social enterprises.

Subcomponent 1A will finance support services for social entrepreneurs and subcomponent 1B will fund the subgrants for incubation or acceleration of social enterprises. The elements of this approach aim to maximize the potential for success of the project-supported social enterprises and enables the participation of less privileged women and youth in social entrepreneurship.

Sub-grants financed under Subcomponent 1B will be both incubation and acceleration sub-grants. The proposed size of subgrants for incubation is up to EUR 10,000, and for acceleration, is up to EUR 25,000.



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Out of the approximately 4,420 trained beneficiaries under Subcomponent 1A, an estimated 3,720 subgrants will be provided across the 11 target provinces. At least 70 percent of beneficiaries of social entrepreneurship support services and subgrants will be women, 30 percent will be youth (both women and men, aged 18-29).

Component 2: Community livelihoods-related facilities in refugee and host communities

To address gaps in facilities, support the efforts of refugee and host community women to earn-income, and promote dialogue and engagement of refugees, host communities and municipal authorities around social enterprises, component 2 will finance: (i) the capacity building and facilitation activities for refugees and host communities to engage in participatory decision-making processes over local needs and priorities for livelihoods-related facilities; and (ii) the cost of establishing/renovating selected livelihoods-related facilities.

A minimum allocation for facilities will be EUR 100,000 and the maximum will be set at EUR 300,000. Depending on final subproject selected and costs, a target of approximately 70 facilities has been set benefiting around 7,000 refugees and host community members.

This component will have additional measures and support to facilitate community engagement especially with civic technology solutions under the COVID 19 pandemic circumstances, where preventive public measures are taken such as limiting physical distancing and introducing localized quarantine measures, enforced by Ministry of Health and Provincial Governors as required.

Component 3: Institutional Capacity Strengthening and Project Management

This component will finance project management, M&E and communications (and visibility) as well as targeted capacity building of national (MoIT, DAs) and local actors (municipalities, local authorities, NGOs, other stakeholders) to strengthen their capabilities to support women's livelihoods development in this project and in the future.

The Ministry of Industry and Technology will be the recipient and implementing agency for the project, delegating responsibilities for the implementation of Components 1 and 2 to five regional Development Agencies (DAs).

1.2 Environmental and Social Risks of the Project

The environmental and social risks for this project have been assessed as being **Substantial** (Risk categories are Low/Moderate/Substantial/High). The World Bank's environmental and social standards that are relevant for this project include: ESS1 Assessment and Management of Environmental and Social Risks and Impacts; ESS2 Labor and Working Conditions; ESS3 Resource Efficiency and Pollution Prevention and Management; ESS4 Community Health and Safety; and ESS10 Stakeholder Engagement and



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Information Disclosure. The project will exclude any subgrant that involves land acquisition, has impact on biodiversity and cultural heritage and takes place in any natural and critical habitats. Real estate purchase and major construction works will also be excluded.

While intrinsic social risks of the project are moderate, contextual factors contribute to the substantial risk. The project is expected to have positive impacts on vulnerable groups as its main target groups are mainly women and youth from refugee and host communities. It aims to improve livelihood opportunities, inclusion and social cohesion among these groups. The project is not expected to cause direct irreversible or unmanageable impacts, as the project will exclude from sub-grant and livelihood support financing any activities causing land acquisition, involuntary resettlement and impacts on cultural heritage. Impacts on community health and safety are expected to be low to moderate and will be managed by adhering to mitigation measures included in the ESMF, including a Code of Conduct for construction workers; Occupational Health and Safety risks such as injuries and fatalities during small civil works are expected to be minor due to limited scale and short duration of construction works to be financed under the Project. Child and forced labor are reported to be observed among Syrian refugees and in some industries in Turkey. The risk will be mitigated with procedures included in the ESMF, with more details to be provided in the SGM which will explicitly exclude any activities which involve child and forced labor. While grants are used, DAs together with the CIPs will have the supervisory role to ensure that the grant is utilized as per the SGM and employees who are hired by the social enterprises are registered to the national social security system with appropriate work permits. Contextual risks stemming from geopolitical context and existing social tensions between host communities and Syrian refugees are considered substantial which will be mitigated through various measures built in project designs as well as steps included in the ESMF and sub project ESMFs. The development of a project SEP that will be implemented from project start to completion will define various strategies to engage with separate stakeholders in addition to employing communications specialists to prevent any social tension. In addition, participatory assessments will be also utilized in monitoring and evaluation activities to help tailor project support to the needs of potential beneficiaries, helping further avoid disruption in social cohesion. Due to cultural gender norms, women may lack interest and willingness to engage in the project. Risks related to Gender Based Violence directly related to the Project is deemed to be low, although domestic/intimate partner violence is reported among Syrian refugees which may be unintentionally exacerbated as a result of changes in intra-household relationships as a result of the Project. Such risks will be mitigated through monitoring of the Code of Conduct, training sessions on Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and SEA/SH sensitive GM, as provided under the ESMF. MoIT and the DAs are new counterparts for the World Bank and will be working with the World Bank on socio-economic issues impacting refugees and host communities for the first time.

MoIT has prepared a draft Environmental and Social Management Framework (ESMF) that describes mitigation measures to manage social and environmental risks. The main environmental risks and impacts are expected to be limited and manageable, including noise, dust and waste management that are confined to small works such as simple construction, refurbishment, and retrofitting.



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1.3 SEP Objectives and Scope

The objectives of this 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/beneficiary feedback mechanism
- Ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format.
- Ensure inclusive meaningful consultations with all groups of stakeholders particularly the vulnerable groups

The SEP for SEECO is structured as follows: Section 2 outlines the relevant national regulations and the World Bank's Environmental and Social Standards. Section 3 summarizes previous stakeholder engagement activities. Section 4 covers the stakeholder mapping, segmentation and analysis, and is followed by section 5 which in turn elaborates on a detailed stakeholder engagement program and key methods of engagement. Section 6 focuses on SEP implementation arrangement and section 7 provides a description of the project's grievance mechanism.

The Stakeholder Engagement Plan also acknowledges the challenges of broad consultations and continuous engagement across all stakeholder groups under the social distancing constraints imposed by the Covid19 pandemic.

2. NATIONAL REGULATIONS AND INTERNATIONAL STANDARDS

2.1 National Regulations

Table 1 summarizes the national legal and regulatory requirements that are relevant for the SEP.

Table 1. Relevant National Legal & Regulatory Requirements

Right of petition, Right to Information and Appeal to the Ombudsperson (Constitution, Article 74)

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

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."



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The Law on Establishment and Duties of Development Agencies No. 5449 and the Presidency Decree No.4 regulate the stakeholders and relations of Development Agencies within the provinces they operate. Development Agencies are unique in the sense that they have governing boards comprised of multiple stakeholders and act as separate legal public entities. The Administrative Board of the DA is the decision-making body of the agency. In the regions composed of one province, the Administrative Board consists of the governor, Mayor of metropolitan municipality, Chairman of the Provincial Council, Chairman of the Chamber of Industry, Chairman of the Chamber of Commerce and three representatives from the private

Law on the Right to Information (Articles 11 and 24)

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

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

1) In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.

a) The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.

b) Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.

2) Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.

3) Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.

4) The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting.

sector and/or NGOs.

In practice, Development Agencies commonly conduct consultations with different stakeholders, depending on the area in which they launch technical and financial support programs. Before programs are designed and executed, conferences, outreach activities and consultations are conducted by technical staff of the DAs in order to solicit feedback and confirm demand from public for the technical and financial support programs that DAs will initiate.



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2.2 World Bank Environmental and Social Standards on Stakeholder Engagement

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).

This standard requires that the Borrower prepares a Stakeholder Engagement Plan (SEP) that is proportionate to the nature and scale of the project and its potential risks and impacts, disclose it as early as possible before project appraisal, and 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 develop 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 (World Bank, 2017: 100)⁴.

⁴ 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>





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3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1 Key Stakeholder Meetings and Consultations

To date stakeholder engagement efforts have included meetings with key stakeholders, including government agencies, development agencies, development partners, NGOs, community centers and temporary accommodation centers and potential beneficiaries in targeted locations through beneficiary assessments.

Table 2 summarizes key aspects and inputs from these stakeholder engagement efforts.

Table 2. Summary of Meetings with Key Stakeholders

Location	Date	Participants	Key Points of Discussion
Government Agencies			
Ankara	July 3, 2019	Ministry of Industry and Technology	<ul style="list-style-type: none"> Developing the project design, timeline and critical milestones Understanding Ministry's strategies and priorities for the project Discussing the implementation arrangements of Development Agencies
Ankara	July 2, 2019	Directorate General of Migration Management	<ul style="list-style-type: none"> Informing on the World Bank's support in technical assistance and projects for refugee and host communities Discussion of social cohesion aspects of the national harmonization strategy
Osmaniye	July 8, 2019	Osmaniye Cevdetiye Refugee Camp	<ul style="list-style-type: none"> Understanding the needs and livelihood opportunities of the refugee population who are transitioning out to urban settlements
Development Agencies			
Adana	July 8, 2019	Çukurova Development Agency	<ul style="list-style-type: none"> Review of DA structure and its support programs, including a women's production cooperative and a school-based community development project which was targeting youth-at-risk groups Discussion of findings of CDA's social analyses on migrant issues, agricultural seasonal workers and children's well-being Learning lessons from CDA's support for local institutions with small social infrastructure through its guided support schemes and various entrepreneurship and incubation centers via



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			partnerships with university and chamber of commerce in order to foster business development
Gaziantep	July 9, 2019	İpekyolu Development Agency	<ul style="list-style-type: none"> Discussion of IDA's experience in implementing grant schemes for women and other vulnerable groups of the community, including support for a Women Entrepreneurship Support Center with the Gaziantep Chambers of Commerce of Gaziantep
Ankara	September 10, 2019	Cukurova, Ipekyolu, Eastern Mediterranean, Karacadag, Dicle Development Agencies and DG of Development Agencies, MoIT	<ul style="list-style-type: none"> Introducing project design details and implementation arrangements Collecting feedback from Development Agencies Understanding current support schemes of Development Agencies
Hatay, Diyarbakir, Mardin, Sanliurfa	September 26, 30, October 1, 3	Eastern Mediterranean DA, Diyarbakir-Karacadag DA, Mardin- Dicle DA and Sanliurfa-Karacadag DA	<ul style="list-style-type: none"> Discussion on Project implementation arrangements Exploring possible roles and responsibilities of DAs and potential Community Implementing Partners Collecting feedback on capacity building support needs of DAs Knowledge and experience sharing with local NGOs
Development Partners			
Ankara	July 10, 2019	FRIT Coordination Office, Delegation of the European Union to Turkey	<ul style="list-style-type: none"> Key steps and requirements of the new projects funded under the Facility for Refugees in Turkey
Ankara	July 5, 2019	UNHCR	<ul style="list-style-type: none"> Learning experiences and knowledge sharing on entrepreneurship projects of UNHCR on the ground
Ankara	July 4, 2019	UNDP	<ul style="list-style-type: none"> Learning experiences and knowledge sharing on projects of UNDP on the ground
Ankara	July 4, 2019	ILO	<ul style="list-style-type: none"> Learning experiences and knowledge sharing on employment and labor market demand of refugee and host communities
Community Centers/NGOs			
Gaziantep	July 9, 2019	GAP CATOM community center	<ul style="list-style-type: none"> Exploring lessons from the Center's efforts to provide multipurpose services to women with different needs, including Turkish literacy classes, basic sewing classes, maternity tracking and



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			women's hygiene, child-friendly spaces with kindergarten facilities
Gaziantep	July 9, 2019	Gaziantep Metropolitan Municipality-ENSAR community center	<ul style="list-style-type: none"> Discussing lessons from the Center's bottom-up approach to the design of its services with participation of beneficiaries. Discussing challenges around the lack of transportation services for women to attend to the trainings provided by the center, and for children to attend schools Discussion of the possibility of middle-class Syrians who are educated and are able to speak the Turkish language to act as change agents and be role models for the Syrian community members
Gaziantep	July 9, 2019	SADA Women Center	<ul style="list-style-type: none"> Exploring lessons from cooperatives targeting Syrian, Afghan and Turkish women Discussing experience from developing cooperative production lines include shoe-leather-making, food production and textile Exchange on factors that have facilitated women's participation and motivation in setting up cooperatives including the importance of husbands and family members being consulted from the very beginning for their consent and their continuous support
Ankara	July 4, 2019	Civil Society Development Center, Ankara	<ul style="list-style-type: none"> Exchange regarding key activities of the Civil Society Development Center Discussing lessons from the Center's response to the refugee influx in Turkey
Ankara	July 2, 2019	Red Crescent Ankara Community Center	<ul style="list-style-type: none"> Learning on Turkish Red Crescent's socio-economic and community development programs for refugee and host communities Observing the Community Center's services to local communities in Ankara
Gaziantep, Osmaniye, Adana, Mersin and Hatay,	12-23 October, 2019	Focus Groups Discussions with Women and Youth from host and refugees communities	<ul style="list-style-type: none"> Conducting a participatory beneficiary needs assessment in order to understand the interest, the livelihood needs and also challenges to engage in a livelihood support activity Learning on the existing social networks and how they tend to engage in economic production which would feed into design and implementation arrangements of project



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In addition to the stakeholder engagement activities described above, the World Bank, in partnership with MoIT and DAs, has conducted beneficiary dialogues with youth and women groups in October 2019 ahead of Project approval. The methodology included focus group discussions to capture a broad range of experiences and situations for refugee and host community women/youth in project areas in Turkey. The sessions took place both separately and jointly (refugee and host communities), in Turkish and Arabic. The findings of the beneficiary dialogues include recommendations for the SEECO guidelines will be included in the Project Operations Manual.

MoIT held stakeholder engagement meetings on November 25-26, 2019 at its premises with participation from relevant development agencies, central and local public institutions, civil society organizations, international organizations and universities (for participant list see Annex 3). Meetings were held in two sessions where the Ministry first gave a presentation about the key aspects of the project and a question and comments session were held afterwards. The Ministry answered questions of stakeholders and clarified the details, and comments were received from stakeholders. Key comments from stakeholders are summarized in Annex 2.

The updated SEP was re-disclosed for stakeholder consultations together with ESMF on January 6, and on January 25 2021 virtual consultations took place by MoIT due to pandemic circumstances. The additional feedback received was included under Annex 2 and the participant list was updated in Annex 3. The SEP will be revised as needed during project implementation.

Local/regional consultations will take place under the COVID 19 measures by the Development Agencies in their own provinces in order to inform about the project and solicit feedback from state and non-state entities on the project and its ESF documents.

3.2 Lessons Learned in Engaging Communities/Stakeholders from Previous Projects

The project incorporates global lessons on forced displacement solutions, in parallel with implementation experience from World Bank-financed and other development partner projects in Turkey. The key lessons are as follows:

In projects that focus on addressing forced displacement, it is important to engage both refugees/IDPs and host communities. A 2018 ICRC Report shows that in various urban settings, host communities often perceive IDPs as a burden when displacement becomes protracted;⁵ displacement is shown to exacerbate pre-existing problems of employment and markets, land and housing, infrastructure, waste management and other public services.⁶ Literature also shows societies where relationships and social identities are

⁵ ICRC (2018). Displaced in Cities: Experiencing and Responding to Urban Internal Displacement Outside of Camps. <https://www.icrc.org/en/publication/4344-displaced-cities-experiencing-and-responding-urban-internal-displacement-outside>

⁶ Ibid.



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rigid have more difficulties maintaining social cohesion in situations where there is rapid social change, such as when there is forced displacement.⁷ Project evaluations,⁸ show that having separate activities for IDPs and host communities can aggravate problems and tension by creating competition for resources.⁹ The project adopts this learning by applying a single set of activities that supports socio-economic benefits for both refugees and host communities.

One of the most important potential development impacts of a project aiming to support refugees is increased social cohesion. A recent review of the thirty World Bank projects that directly or indirectly aimed at promoting social cohesion in settings where there is forced displacement recommends a number of steps that will be taken up by the project and associated analytical work, i.e. (i) a simple definition of social cohesion be applied,¹⁰ (ii) a nuanced political economy study and historical analysis, (iii) take a longer-term strategic approach to supporting social cohesion, (iv) incorporating measures and assessment of social cohesion via social cohesion indices, and (v) incorporate indicators to measure social cohesion. This project understands social cohesion as having the intra-community, inter-community and community-institutional dimensions, will have completed a field study in a sample set of communities, will adopt a first-do-no-harm approach and includes a social cohesion indicator.¹¹

Addressing the needs of refugee women requires addressing root causes of gender inequality and gender-based violence. Evidence points to the fact that women and girls from displaced households are more vulnerable than others to gender-based violence (GBV)¹², including rape and forced/child marriages.¹³ Violence against women, in turn, limits women's earning capabilities.¹⁴ In a 2015 survey, 94% of respondents, including practitioners, policy-makers, researchers and activists working on GBV identified women's economic dependency on men as the single most important factor or cause of violence against women.¹⁵ At the same time, working women can face violence on their way to work, especially

⁷ De Berry and Roberts (2018). Social Cohesion and Forced Displacement: A Desk Review to Inform Programming and Project Design. World Bank, Washington, DC. Available at: <http://documents.worldbank.org/curated/en/125521531981681035/Social-cohesion-and-forced-displacement-a-desk-review-to-inform-programming-and-project-design>

⁸ For instance [add] and World Bank IEG Project Performance Assessment Report (2018) of the Colombia Peace and Development Project.

⁹ IEG Op cit.

¹⁰ The set of relationships between individuals and groups in a particular environment and between those individuals and groups and the institutions that govern them in a particular environment

¹¹ De Berry, Op cit.

¹² World Bank (2018). Gender Based Violence in Fragile, Conflict, and Violence (FCV) Situations: Five Key Questions to be Answered. World Bank, Washington, DC. Available at: <http://documents.worldbank.org/curated/en/500211539840991140/Gender-Based-Violence-in-Fragile-Conflict-and-Violence-FCV-Situations-Five-Key-Questions-to-be-Answered>

¹³ Ibid.

¹⁴ Georgia, T. (2015) DFID Guidance Note on Addressing Violence Against Women and Girls (VAWG) Through DFID's Economic Development and Women's Economic Empowerment Programmes: Part B, London: VAWG Helpdesk. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444145/Health-guidance-note-partB_2_.pdf

¹⁵ Ibid.



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when they use public transport or live in informal settlements or camps.¹⁶ A 2018 assessment of Syrian women and girls in Turkey noted that GBV is prevalent amongst the Syrian population and is closely linked with socio-economic challenges that Syrian women and girls face daily. The project will complement gender-related efforts by focusing on awareness-raising and education campaigns. Addressing the root causes of gender inequality is therefore essential when aiming to reduce violence against women. There is also evidence that if the gender inequalities that drive violence against women are not addressed, economic empowerment initiatives can make the lives of women worse. DFID's women's economic empowerment program highlights the need for: improving women's knowledge and communication capabilities in work and in the home; promoting formal employment away from the home; promoting women's organizations and networking; and increasing women's access to business development services and financial services are some of the key enabling or facilitating factors for promoting women's empowerment.¹⁷ A holistic approach to address gender issues for Syrian refugees and Turkish women from host communities has been considered in the design of the project.

Investments to promote socio-economic inclusion of refugees and host communities is sustainable when activities are designed and implemented in partnership with local stakeholders. A World Bank review of social cohesion approaches globally highlights the importance of history, and organizations embedded in communities are most likely to understand the socio-political economy issues, and understand that social cohesion is greater than refugee-host community dynamics.¹⁸ The project will adopt an implementation approach whereby Development Agencies appoint Community Implementing Partners (NGOs, foundations, or a consortium of such entities) that have sound knowledge of and access into communities through trusting relationships and will deliver a holistic set of services. A non-state—state approach which also champions local women leadership and develops platforms for engagement with local authorities is proposed.

Facilitating refugees and host communities to identify their own priorities and mechanisms for socio-economic inclusion will create more sustainable and relevant action – platforms for engagement and feedback from beneficiaries is key to targeting and locally relevant solutions. The project seeks to build on existing development planning processes while enhancing the participation of refugees and host communities. Beneficiary engagement has dual benefits. First, it leads to better understanding of needs, improved efficiency of activities, and sustainability of investments; and second, engaging refugee and host community groups (and targeted engagement with women, youth, and people with disabilities) fosters harmonization and cohesion. This approach will be supported by skilled facilitation of local actors, capacity building of women leaders, transparency and access to user-friendly information, and mutually-beneficial processes and outcomes. The project will mobilize refugee and host community beneficiaries (both women and men) and provide capacity-building support to enhance their participation in local socio-economic development processes.

¹⁶ Haspels et al., 2001 in Georgia, T. ibid.

¹⁷ Kabeer, 2011 in Georgia, T. ibid.

¹⁸ De Berry, Op Cit.



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Key development partners working with the Turkish authorities in refugee response programs, like UNHCR¹⁹, have built their communication with communities strategy for refugees and host communities on three pillars: (1) Effective two way communication and information disclosure channels (2) inter-agency coordination with other development partners (3) Cooperation with Turkish authorities (DGMM and Ministry of Labor, Family and Social Services). UNHCR's survey findings on the communication sources, tools and needs of refugee communities indicate that:

- The principal sources of information are usually unofficial and informal, both offline (through informal networks) and online (through group platforms on social media such as Facebook). Given the informal nature of the channels, refugees feel uncertain about the authenticity of the information they have. Moreover, these channels pose the risk of being prone to inadvertent or deliberate misinformation and misunderstandings, which can spread quickly to a wider population within a short period of time.
- Official sources, such as national authorities-DGMM, United Nations agencies, and partners, are the most trusted sources to provide accurate information.
- Key information gaps that remain among the refugee population are on their rights, obligations and the services available to them in Turkey. A majority of respondents have indicated that they are not sufficiently informed of their rights and obligations. Follow-up focus group discussions by UNHCR, however, suggest that refugees tend to have the necessary information, while considering themselves insufficiently informed.

Similarly, the Turkish Red Crescent (TRC), working both on the humanitarian protection and livelihood dimensions of the refugee response agenda has been implementing a thorough stakeholder engagement and communication strategy. Mainly the strategy consists of 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 Centers, Communication Materials, Complaints and Response Mechanism, and including an advisory committee consisting of both refugee and host community members.

4. STAKEHOLDER MAPPING 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, the term “**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,

¹⁹ UNHCR, July 2019, Factsheet, Communication with Communities:
<https://reliefweb.int/sites/reliefweb.int/files/resources/71060.pdf>





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including local communities” (World Bank, 2018b). They are the individuals or households most likely to observe changes from environmental and social impacts of the project.

The term “**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, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups” (World Bank, 2018b).

Vulnerable groups: It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups to be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person’s origin, gender, age, health condition, economic problems, disadvantaged status in the community dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

4.1 Stakeholder Mapping and Analysis

This section identifies the comprehensive list of stakeholders that are relevant for the project. Stakeholders are divided into PAPs and OIPs in the following tables.

Table. 3 Stakeholder Mapping

	Stakeholder Groups	Details
Project affected parties (PAP)	PAPs	Women and youth from host and refugee communities, male household members, community members, community leaders, children of refugee and host community families, social enterprises, people employed by social enterprises, existing community businesses, buyers of goods and users of services provided by the social enterprises
Other Interested	Government Authorities	MoIT, Ministry of Trade, Ministry of Family, Labor and Social Services, Ministry of Education, DGMM, DAs, municipal authorities, Small and Medium Enterprise Development Agency (KOSGEB), FRIT Coordination office at Presidency of the Republic of Turkey, Strategy and Budget Office of Presidency,
	Private Sector	Private sector-existing social enterprises, other enterprises,



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Parties (OIP)		contractors, chambers of commerce and industry
	Project Implementing Partners	FRIT Project Steering Committee, Regional level multi-stakeholder advisory platforms, CIPs, local NGOs
	International Development Partners	EU Delegation to Turkey, WB, UNHCR, UNDP, ILO, IOM, Turkish Red Crescent
	NGOs	International, national & provincial level NGOs working on women livelihoods, refugee and host community support
	Media	International, national and local media
	General Public	Perception of general public influences host community perception in general
Vulnerable Groups	Women and youth who have disabilities	Since the project already focuses on the vulnerable populations, within the refugee and host communities, there maybe groups with additional vulnerabilities, such as illiteracy, disability, country of origin then the majority of the refugees participating into this program.
	Earthquake victims (affected by, the 6th February, Kahramanmaraş Earthquakes)	The project has been implemented in the 11 provinces (Mardin, Şanlıurfa, Diyarbakır, Mersin, Adana, Gaziantep, Kilis, Adıyaman, Hatay, Kahramanmaraş and Osmaniye) since 2022. Many people were severely affected by devastating earthquakes, and due to the earthquake's effects new vulnerable groups occurred such as the homeless, single-parent family, and orphans.

The direct beneficiaries of this Project are refugees (especially ESSN beneficiaries) and host community members living in project locations. Beneficiary dialogues/assessment were conducted on October 2019 during preparation stage in several cities, Gaziantep, Osmaniye, Adana, Mersin and Hatay with women in refugee and host communities, whom could be potentially a beneficiary for this project.

The vulnerability of refugees depends on several factors such as refugees differ in terms of income. Location of residence also affects the vulnerability of refugees, also their protection and immigration status and country of origin.

Table 4.1: Refugee Vulnerabilities and Project Responses

<u>Vulnerabilities</u>	<u>Project Responses</u>
<ul style="list-style-type: none"> High poverty and low rates of employment Location of residence Protection status, work permit availability Turkish language 	<ul style="list-style-type: none"> Direct support to social enterprise incubation and acceleration. Social enterprises are also expected to create jobs. The project focuses on provinces with the highest number of refugees and highest socioeconomic need. The project will support refugees to acquire legal paperwork that allow them to work or operate businesses. The project will support refugees to improve their knowledge of Turkish language.



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The project will address the vulnerabilities of host community members, with a focus on those vulnerabilities that have been exacerbated by the refugee crisis. One of the most noticeable impacts of the refugee crisis on host communities are summarized below:

Table 4.2: Host Community Vulnerabilities and Project Responses

<u>Main Needs and Constraints:</u>	<u>Specific Actions:</u>
<ul style="list-style-type: none"> • Competition for jobs and competition from businesses employing workers informally • Overstretched municipal, education, and health services • Lack of social cohesion and perceived increase in crime 	<ul style="list-style-type: none"> • Parity in resource allocation between refugee and host communities • Assistance to refugees and business owners in hiring refugees legally • Support for livelihoods facilities through local authorities • Social enterprises may address the issue of overstretched services • Support for joint refugee and host community decision making and other activities that can improve social cohesion

In addition to these vulnerabilities, the beneficiary assessments concluded during the preparation of the Project also found women and youth specific vulnerabilities. For both refugee and host community women, the availability of child and elderly care is an important factor in whether or not women work. Experience shows that refugee women are more likely to attend trainings or engage in economic activity when childcare services are available as part of these activities.

Table 4.3: Women Vulnerabilities and Project Responses

<u>Vulnerabilities</u>	<u>Project Responses</u>
<ul style="list-style-type: none"> • Reduced labor force participation • Lower rates of entrepreneurship • Caretaking responsibilities and lack of access to child, elderly, and disabled care • Social norms and acceptability of women's work • Gender-based violence 	<ul style="list-style-type: none"> • Specific focus on improving livelihoods of women, including by directly targeting females for social entrepreneurship incubation and acceleration. • Livelihoods facilities to be determined to address most important constraints, which could be child, elderly, and disabled care. • Social enterprises could be set up by groups of women, allowing them to work part-time and take care of other obligations. • Coaches and mentors will be trained to provide basic support and referrals to address any kind of constraint faced by women, with a specific focus on addressing issues such as gender-based violence.

At least 30 percent of project beneficiaries will be ages 18-29. The population of Turkey is young. Overall, 15.8 percent of Turkey's population is between the ages of 15 and 24, and another 27% are between 0 and



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14 years old.²⁰ The refugee population in Turkey is also young. Data for the refugee population as a whole is difficult to find, but over 800,000 Syrian refugees are between ages 15-24.²¹

Table 4.4: Youth Vulnerabilities and Project Responses

<u>Vulnerabilities</u>	<u>Project Responses</u>
<ul style="list-style-type: none"> Large numbers of youth Unemployment among educated youth Low rates of youth entrepreneurship Lack of social security benefits 	<ul style="list-style-type: none"> Promoting youth involvement in social entrepreneurship and as job creators Opening up opportunities for skilled and educated youth as social entrepreneurs Legal assistance on matters such as business registration and taxation, social security, etc.

Stakeholders	Relevance/Area of Influence	Significance
PROJECT AFFECTED PARTIES		
Women and youth from refugee communities	Women and youth from refugee communities are disadvantaged with regard to access to livelihood and job opportunities. Their forced-displacement history and also language barriers may add another layer of vulnerability. They are the main project beneficiaries. Services to help women and youth set up social enterprises will be defined separately according to their needs.	High
Women and youth from host communities	Women and youth from host communities are disadvantaged with regard to access to livelihood and job opportunities in the Turkish labor market. Women have low participation rates and youth have higher unemployment incidence compared to national average. They are also the main project beneficiaries. Services to help women and youth set up social enterprises will be defined separately according to their needs.	High
Vulnerable groups	Vulnerable groups may be from both the refugee and host communities who will be among the project beneficiaries. They maybe illiterate or have different vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure.	High
Male household members and community elders	Male household/community support is important for women to take part in project activities and work outside the home in social enterprises	Medium
Host community members	The host community will have a stake in the identification and implementation of local needs and priorities for livelihoods-related facilities that will support social enterprise development	Medium
Mukhtars	Mukhtars have a stake in the identification and implementation of local needs and priorities for livelihoods-related facilities	Medium

²⁰ World Population Review. 2019. Available at: <http://worldpopulationreview.com/countries/turkey-population/>.

²¹ UNHCR. 2019. "Turkey Fact Sheet". Available at: <https://www.unhcr.org/tr/wp-content/uploads/sites/14/2019/08/7.2-UNHCR-Turkey-General-Fact-Sheet-July-2019-FINAL.pdf>.



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Existing social enterprises (cooperatives, limited liability companies, sole traders, associations, corporations and foundations)	Existing social enterprises will be able to apply for support under the project, and those selected will benefit from grants and capacity-building	High
Children of refugee and host community families	Children will benefit from livelihood facilities projects under Component 2 that support childcare facilities and are also expected to benefit from some of the activities of social enterprises	Medium
Employees of social enterprises	Employees under social enterprises will benefit from employment/livelihoods due to project support	Medium
Buyers of goods and users of services provided by the social enterprises.	Depending on the goods and services provided by the social enterprises, they will have an impact on their success	Medium
OTHER INTERESTED PARTIES		
Government Authorities		
Presidency of Republic of Turkey, FRIT Coordination Office	Presidency has the role in approving and supervising the effectiveness of all FRIT recipient operations on behalf of the Government of Turkey. The FRIT office has the coordination role among recipient government agencies and will exercise this oversight over the SEECO project.	High
Ministry of Industry and Technology	Recipient and implementing agency of the project	High
Ministry of Trade	The Ministry would collaborate on the preparation of legislation on social enterprises with MoIT, and is looking for successful examples in the social business sector to inform policy and legal framework changes	Medium
Directorate General of Migration Management	DGMM provides overall oversight and coordination of policies and strategies relating to the area of migration and coordinates institutions and organizations working on refugee response efforts such as the SEECO project	Medium
Ministry of Family, Labor and Social Services	The Ministry can influence the policies and legislative framework which regulates work permits, work and employment conditions of Syrians under Temporary Protection, Turkish citizens, foreign residents and temporary workers, which impacts social enterprise development. MoLSS is also responsible agency for coordinating the ESSN Exit Strategy.	High
Government Authorities (Provincial Level)		
Development Agencies for	DAs will be responsible for the implementation of all aspects of the project at local level (including through CIPs); provide technical and financial	High



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Adana, Mersin, Gaziantep, Adıyaman, Kilis, Mardin, Hatay, Osmaniye, Kahramanmaraş, Diyarbakır and Şanlıurfa.	resources for enterprise development and the overall development of the entrepreneurship ecosystem in their regions	
Government Authorities (Local Level)		
Municipal and other local Authorities (Councilors and administrators)	Local authorities will be support the engagement of refugees and host communities in participatory decision-making processes over local needs and priorities for livelihoods-related facilities and have responsibility for sustaining livelihoods investments over time	High
International Development Partners		
Delegation of the European Union to Turkey	The EU Facility for Refugees in Turkey is financing the project. FRIT manages a total of €6 billion, is designed to ensure that the needs of refugees and host communities in Turkey are addressed in a comprehensive and coordinated manner. The Facility focuses on humanitarian assistance, education, migration management, health, municipal infrastructure, and socio-economic support.	High
UNHCR	In Turkey, the main areas of UNHCR's work are leading and coordinating the efforts of the United Nations agencies in support of Turkey's response to the Syria refugee crisis. UNHCR will be a key partner in project implementation.	Low
UNDP	UNDP manages the Syria Crisis Response and Resilience Programme with related programming in Turkey. The project will seek to coordinate efforts with UNDP, where relevant, in SEECO project areas.	Low
ILO	The ILO office in Turkey strives to guarantee the core elements of social justice, which are respect for human rights, decent living standards, human working conditions, employment opportunity and economic security for working people everywhere. In line with this objective, the ILO aims to combat child labour, to increase women and youth employment, to strengthen social dialogue and eliminate informal economy. The SEECO project will coordinate with ILO, where relevant, on social enterprises and refugee/host community employment activities.	Low
World Bank	EU FRIT has an administrative agreement with the World Bank, through which it will provide funding for the Social Entrepreneurship, Empowerment and Cohesion in Refugee and Host Communities in Turkey Project. The WB's role is that, as "administrator of funds", it has the role of supervision and implementation support to the recipient agencies	High
Project Implementing Partners		
FRIT Project Steering Committee	The SC is comprised of representatives from MoIT, other government agencies and other relevant stakeholders, including the EC and the World Bank. As requested by MoIT, the committee can act as an advisory body	Medium



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(national level)	and take decisions, if requested.	
Community Implementing Partners	CIPs will be appointed by DAs to carry out project activities directly with the refugee and host community beneficiaries in selected project locations.	High
Community-Based Organizations/ Women's Livelihoods Committees (WLCs)	WLCs will be responsible for leading the communities' engagement and social cohesion activities under the project.	High
Private Sector		
Private sector (private sector organizations, chambers of commerce, multinational companies)	Private sector actors will have an overall interest to integrate social businesses into their supply chain; will need to be engaged in considering the sustainability of the project and social enterprise investments.	Medium
Existing community businesses	Depending on which part of the market value chain to which they provide goods/services, existing community businesses may benefit from, or provide support or investment in, social enterprises under the project.	Low
Contractors	Contractors will be required to implement civil works in compliance with ESSs.	Medium
Small and Medium Enterprises Development Organization of Turkey	SMEs Development Organization will have an interest in the success of project-supported social enterprises as part of Turkey's broader Entrepreneurship Strategy developed by KOSGEB.	Low
NGOs, Media and Public		
CSOs (national and provincial level)	CSOs may have an interest in sharing their experiences and lessons learned in related activities to support refugees/host communities/entrepreneurship and exploring potential areas for collaboration; some CSOs may serve as CIPs for the project.	Low
Media (local, national & international)	The media will have a key role in disseminating information on the efforts and results of the project	Medium
General Public	The public will have a broad interest in the project's results and beneficiaries. Public perception is also important in influencing host community perception and hence social cohesion outcomes of the project.	Medium

State Stakeholders	Non-state stakeholders
Presidency of Republic of Turkey, FRIT Coordination	Civil society organizations



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Office	
Ministry of Industry and Technology	Community based organizations
Ministry of Trade	Media
Directorate General of Migration Management	Humanitarian organizations
Ministry of Family, Labor and Social Services	
Small and Medium Enterprises Development Organization of Turkey	
Development Agencies	
Provincial Directorates of Relevant Ministries	
Municipalities	
Semi-governmental organizations (such as Unions, Chambers of Commerce and Chambers of Industry)	



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4.2 Stakeholder Analysis

This section provides an analysis of stakeholders that have medium or high significance. However, those with low significance stated in the above table will be also included in the stakeholder activities, as required.

Table 4. Stakeholder Analysis

Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
PROJECT-AFFECTED PARTIES				
Women and youth from refugee communities	<p>They do not have sufficient opportunities for livelihood generation and social entrepreneurship</p> <p>Language barriers of refugee communities</p> <p>Eagerness to engage and integrate to Turkish society</p>	<ul style="list-style-type: none"> The project will provide them with funding for livelihood generation and social entrepreneurship The selection of beneficiaries will be based on transparent criteria and will be unbiased They will be provided with technical assistance and capacity building for incubating/accelerating their social enterprises 	<ul style="list-style-type: none"> Women may face challenges that might hinder the sustainability of the enterprises, such as child care, safe transportation, working outside their neighborhoods, cultural norms and male resistance Beneficiaries may not have the required skills and talents that are relevant to ensure relevance to the incubation and acceleration support services Exogenous variables such as a limited business environment may be a challenge for the sustainability of the enterprises Social tensions may exist between refugee and host 	<ul style="list-style-type: none"> The project will carry out participatory assessments to identify, and find solutions to, locally-relevant constraints of Turkish women and refugees The project will include market analysis to identify the skills and talents of target beneficiaries to ensure relevance to the incubation and acceleration support services. It will also enhance the support system for social enterprises by establishing a business alliance on responsible sourcing which reinforces and creates a mutually dependent system Language training and to improve social cohesion between refugees and host communities through



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			community women	social enterprise development and participatory engagement in livelihoods facilities
Women and youth from host communities	<p>They do not have sufficient opportunities for livelihood generation and social entrepreneurship</p> <p>Women and youth have lower rates of employment</p> <p>Openness to engage with women and youth groups from refugee communities, however less interest to integrate/harmonize</p>	<ul style="list-style-type: none"> The project will provide them with funding for livelihood generation and social entrepreneurship The selection of beneficiaries will be based on transparent criteria and will be unbiased They will be provided with technical assistance and capacity building for incubating/accelerating their social enterprises 	<ul style="list-style-type: none"> Women may face challenges that might hinder the sustainability of the enterprises, such as child care, safe transportation, working outside their neighborhoods, cultural norms and male resistance Beneficiaries may not have the required skills and talents that are relevant to ensure relevance to the incubation and acceleration support services Exogenous variables such as a limited business environment may be a challenge for the sustainability of the enterprises Social tensions may exist between refugee and host community women 	<ul style="list-style-type: none"> The project will carry out participatory assessments to identify, and find solutions to, locally-relevant constraints of Turkish women and refugees The project will include market analysis to identify the skills and talents of target beneficiaries to ensure relevance to the incubation and acceleration support services. It will also enhance the support system for social enterprises by establishing a business alliance on responsible sourcing which reinforces and creates a mutually dependent system To improve social cohesion between refugees and host communities through social enterprise development and participatory engagement in livelihoods facilities
Vulnerable groups	Vulnerable groups may be from both the refugee and host communities who will be among the project beneficiaries. They maybe illiterate or have different	<ul style="list-style-type: none"> The project will provide them with funding for livelihood generation and social entrepreneurship 	<ul style="list-style-type: none"> Vulnerable people among both host and refugee communities may face challenges to affectively attend the project activities. This could be due to 	<ul style="list-style-type: none"> During outreach activities of CIPs and project information disclosure activities, people who face difficulties accessing project benefits or face significant negative



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	vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure.	<ul style="list-style-type: none"> The selection of beneficiaries will be based on transparent criteria and will be unbiased They will be provided with technical assistance and capacity building for incubating/accelerating their social enterprises 	<p>language barriers, illiteracy or other challenges such as different disabilities</p> <ul style="list-style-type: none"> They may have certain disabilities which may limit them to benefit from the project equally as other beneficiaries. 	<p>impacts in subproject implementation areas due to socioeconomic, ethnic or other drivers of vulnerability will be identified and measures will be taken to address them.</p> <ul style="list-style-type: none"> For those disabled persons who want to engage in the project, the project will include measures for their accessibility (ie online channels, audio services etc will be provided depending on the disability type). For illiterate, verbal and non-technical communication will be utilized.
Male household members and community elders	They may create barrier for women to be engaged in employment and livelihood generation activities, or be unwilling to take on household responsibilities in the absence of women	The project will provide benefits not only for women but also for the community at large	They may challenge or create hindrances for women to participate in the project	Outreach and training will also be targeted to male household members and community elders, including discussion of topics such as the benefits of social enterprises for households and gender roles, managing finances and access to services
Community members/leaders/ Mukhtars	The community may perceive that social enterprises and investments in livelihoods facilities only benefit a small number of target beneficiaries, and that project support is directed primarily to	<ul style="list-style-type: none"> They will have opportunities to express their priorities/preferences to determine which municipal livelihood 	<ul style="list-style-type: none"> Limited buy-in/willingness from the community Tensions/community concerns over funding being spent on refugees rather than host communities 	<ul style="list-style-type: none"> Capacity building and facilitation activities for refugees and host communities to engage in participatory decision-making processes over local needs and priorities for livelihoods-related



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	Syrian refugees at the expense of Turkish hosting communities	<p>generation assets/facilities should be established/renovated</p> <ul style="list-style-type: none"> The project's activities will not exacerbate social tensions among refugees and hosts, and other members of the community 		<p>facilities</p> <ul style="list-style-type: none"> Proactive efforts to disseminate information regarding the project Social cohesion baseline survey/monitoring Project feedback/grievance mechanism
Owners/leaders of existing social enterprises	<ul style="list-style-type: none"> Perception that support for new/growing social enterprises led by women and youth is at the expense of their enterprises Concerns that new/burgeoning enterprises will be a source of competition for them in an already limited market 	<ul style="list-style-type: none"> The project's activities will lead to a better business climate and opportunities for social enterprises overall Existing social enterprises can access accelerator grants under the project 	Limited or no buy-in from owners of existing social enterprises	<ul style="list-style-type: none"> Proactive efforts to disseminate information regarding the project Outreach to existing social enterprises regarding the possibility of training/coaching and accelerator grants under the project
Children of refugee families	<ul style="list-style-type: none"> Need for child care for the primary women participants of project activities Potential for child labor in social enterprises supported under the project 	It will not utilize child labor, and will provide options for child care as part of livelihoods facilities under Component 2	<ul style="list-style-type: none"> Child neglect if there is no childcare support or alternatives Child labor in project-supported social enterprises 	<ul style="list-style-type: none"> The project will provide subgrants for community livelihoods-related facilities, including kindergartens and childcare facilities, child-friendly spaces The project will ensure strong safeguards against child labor in project-support SEs
Contracted workers/ local providers of goods and services	Risks related to adherence to code of conduct, labor standards, and environmental and social safeguards	Opportunities to provide support for civil works and provision of goods and services required for social	There may be occupational health and safety concerns during civil works	Labor Management Procedures have been prepared by MoIT and the Labor Management Plan that will apply to all project workers will include the Code



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		enterprise and livelihoods facilities development		of Conduct for project workers as well as principles and procedures for workers' grievance mechanism
Contractors	Risks related to adherence to code of conduct, labor standards and environmental and social safeguards in carrying out small scale civil works	Potential to engage workers to carry out small scale civil works	There may be occupational health and safety concerns during civil works as well as issue around adherence to environmental and social standards	MoIT and DAs will ensure that small scale civil works contractors comply with OHS policies and procedures included in the LMP and ESMF
Buyers of goods and users of services provided by the social enterprises.	Potential to purchase a variety of goods and services from social enterprises	Potential to purchase a variety of goods and services from social enterprises	There may be dissatisfaction/mistrust on their part if the social enterprises are unsustainable	<ul style="list-style-type: none"> The project will enhance the support system for social enterprises by establishing a business alliance on responsible sourcing which reinforces and creates a mutually dependent system The project will provide support for assets/facilities that will be owned and operated by municipalities and thus be available when project funding stops as municipalities have the incentive to enhance economic development



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Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
OTHER INTERESTED PARTIES				
Government Authorities				
Presidency of Republic of Turkey, FRIT Coordination Office	<ul style="list-style-type: none"> Presidency has the role in approving and issuing the effectiveness of all FRIT recipient operations on behalf of the Government of Turkey. The FRIT office has the coordination role among recipient government agencies. Presidency in close relation with EU to continue to support the Government of Turkey's efforts in refugee response 	That the project achieves its results, disburses smoothly and contributes Government of Turkey's refugee response agenda including ESSN exist strategy	FRIT coordination office gaining limited information on project progress and disbursement figures	<ul style="list-style-type: none"> MoIT sharing six monthly project progress reports with FRIT coordination office in the Presidency World Bank taking part in regular meetings and briefings with the Presidency and FRIT coordination office
Ministry of Trade	<ul style="list-style-type: none"> Ministry has a DG on Cooperatives and has recently launched 'social cooperatives' as a new model to reach out disadvantaged populations 	The Ministry would collaborate on the preparation of legislation on social enterprises with MoIT, and is looking for successful examples in the social business sector to inform policy and legal framework changes	Priorities of Ministry may change, new regulations on cooperative structure may impact outcomes in both ways	<ul style="list-style-type: none"> Ministry membership on FRIT Steering committee Member of working committee on legal and policy framework to improve the social enterprise sector, including social cooperatives
Directorate General of Migration Management	Alignment of policies and strategies relating to the area of migration and to coordinate institutions and organizations related to these issues	That the project's objectives and implementation is aligned with Turkey's harmonization and migration management strategy	Facing limited coordination with MoIT; unable to obtain information regarding project activities and outcomes	<ul style="list-style-type: none"> DGMM membership on FRIT Steering committee Regular reporting to DGMM on project activities and regular briefing by WB and MoIT teams



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Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
Ministry of Family, Labor and Social Services	Ministry is coordinating the Government's ESSN Exit Strategy. MoLSS can establish the policies and legislative framework which regulates work permits, work and employment conditions of Syrians under Temporary Protection, Turkish citizens, refugees under international protection, foreign residents and temporary workers that impact project success. In addition, the DG of Women Status is in charge of fostering women cooperatives	Project outcomes support ESSN Exit strategy of the Government. Project objectives improve the employability of vulnerable groups in both refugee and host communities, support the Government's policies and programs on employment growth to incentivize women's self-employment and entrepreneurship opportunities for both women and youth	<ul style="list-style-type: none"> • Insufficient knowledge of social enterprise development as part of ESSN exit strategy • DG of Women Status priorities and strategy on fostering women livelihoods through cooperatives will be critical 	<ul style="list-style-type: none"> • Membership of Ministry on FRIT Steering Committee in order to understand the implementation of FRIT projects in socio-economic support, whether projects contribute to any employability improvement in ESSN beneficiaries • Regular reporting and outreach from WB and MoIT teams to raise awareness regarding the role of social enterprise development
International Development Partners				
EU FRIT	The project addresses the needs of refugees and host communities in Turkey in a comprehensive and coordinated manner. In addition the project is in line with ESSN Exit Strategy.	The project addresses the needs of refugees and host communities in Turkey in a comprehensive and coordinated manner	The project's results are not achieved and the project does not contribute to the overarching goals around ESSN exit strategy	Project M&E and semi-annual review of implementation progress; ongoing dialogue with EU FRIT counterparts on project progress
World Bank	The project addresses the needs of refugees and host communities in Turkey in a comprehensive and coordinated manner	The project achieves the PDO and that it is implemented per WB safeguards, procurement and FM requirements	The project's results are not achieved, there are implementation difficulties or lack of project impact based on target outcomes	Capacity building support for MoIT, DAs and municipalities; engagement of local CSOs, adoption of participatory and gender sensitive approaches, M&E and reporting system to ensure compliance with safeguards, procurement and FM requirements



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Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
Project Implementing Partners				
FRIT Project Steering Committee (national level)	The importance of regular updates and action on issues that create an enabling policy environment for project implementation	Regular updates on implementation progress	<ul style="list-style-type: none"> Lack of national-level dialogue and understanding of project goals and results Lack of enabling policy environment for project activities to be successfully implemented 	MoIT will assume the lead on coordination of the committee and will help to set the agendas and ensure key issues are raised and addressed by Committee Members.
Ministry of Industry & Technology, GD of Development Agencies	<ul style="list-style-type: none"> Adequate allocation of budgets & delegation of responsibilities for Components 1 and 2 in the selected provinces to regional Development Agencies (DAs) Capacity building of key stakeholders, including Development Agencies, municipalities, local authorities and other national and local state and non-state stakeholders Adequate visibility regarding the EU's financial contribution to support the humanitarian and development needs of refugees and host communities in Turkey 	That the project achieves its results, and that it is implemented effectively by the selected Development Agencies per WB safeguards, FM and procurement standards	<ul style="list-style-type: none"> New to World Bank operations Need for coordination and oversight of DAs on project activities 	WB capacity building support for MoIT to design, implement and monitor social enterprise incubation and acceleration activities, including hiring additional staff (consultants) on project's financial management, procurement, environmental and social, communications and M&E
Development Agencies (provincial level)	Adequate implementation of Component 1 and 2 activities in collaboration with MoIT and municipal authorities	Achieve project targets DA project area	<ul style="list-style-type: none"> Limited experience with social enterprises No prior experience working with the World Bank Very different operating 	<ul style="list-style-type: none"> Capacity building of DAs under Component 3 and collaboration with CIPs World Bank engagement and capacity building



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Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
			environments across DAs	<ul style="list-style-type: none"> Flexibility to adapt project activities to needs of communities in DAs and based on market assessment/initial analyses
Local Public Authorities	Creation of sustainable solutions for social enterprises by creating assets/facilities that will be owned and operated by municipalities and thus be available when project funding stops as municipalities have the incentive to enhance economic development.	<p>Establishing assets/facilities that are in line with municipal plans/priorities</p> <p>Having successful social enterprises for host and refugee communities</p>	<ul style="list-style-type: none"> Municipalities that are unable to commit budgets for O&M Insufficient capacity of municipal authorities to implement the project Insufficient experience with participatory decision making and engaging refugee communities Potential political sensitivities /host community concerns with involving refugees in decision making process 	<p>A precondition for funding will be that the municipality or relevant department commits budget for O&M, and each subproject financed under Component 2 requires an O&M plan</p> <ul style="list-style-type: none"> Where possible, agreements will be made with municipalities to enable the beneficiaries themselves to participate in their operation (reducing municipal costs and increasing community ownership) Detailed procedures in Project Operations and SubGrant Manuals
Community implementing partners (local level)	They will implement training and mentoring activities for incubation and acceleration, disbursing grants to new and existing social entrepreneurs and post-creation supporting services, and the community mobilization/decision-making and social cohesion activities	<p>To deliver outputs on time based on CIP terms of reference</p> <ul style="list-style-type: none"> To have well defined written instructions and program reporting templates to comply with DA, MoIT and WB requirements 	<p>The pool of CIPs in selected locations may have limited experience with incubation and acceleration support services, grant-making, community development and institutional capacity building</p> <ul style="list-style-type: none"> The CIPs may have difficulty in managing funding and 	<ul style="list-style-type: none"> Market analysis and identification of possible well qualified CIPs Exchange of knowledge/experience across CIPs Beneficiary feedback/grievance mechanisms Project M&E and CIP reporting to DAs



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Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
	<ul style="list-style-type: none"> They will provide outreach to members of the refugee and host communities at the grassroots level to ensure that the project reaches its targets for female beneficiaries 		resources and effective implementation	
Community-Based Organizations/ Women's Livelihoods Committees	They will develop social cohesion focused activities with local communities to ensure local relevance and address local challenges	They are compensated for their time/efforts to undertake social cohesion activities	<ul style="list-style-type: none"> There is lack of willingness to engage by CBOs/WLCs They may have expectations of compensation (in cash or in kind) 	Engagement of CIPs to recruit members to Committees – outreach and information sharing campaign
Private sector	Integration of successful and sustainable social enterprises into supply-value chains	<ul style="list-style-type: none"> Inform policy and regulatory changes for social enterprises Social enterprises supported by this project will be successful and sustainable, thereby reducing the risk of including them in market supply chains 	There may be limited awareness of successful or promising social enterprises and their services/products	The project will provide support for a business alliance on responsible sourcing. This will promote the services and/or products by these social enterprises. The alliance will be facilitated through private sector organizations, chambers of commerce that are vocal on these issues
Media (Printed)	<ul style="list-style-type: none"> Document and disseminate successes (and challenges) with regard to the ESSN exit strategy Highlight social tensions between host and refugee communities 	The project will have positive outcomes with regard to social enterprises and social cohesion	<ul style="list-style-type: none"> Any challenges related to the project's implementation and results would be disseminated by the media as well Media messaging could be politically charged around 	Preparation and implementation of Communications and Visibility Plan in line with EU visibility guidelines, that emphasizes project goals and activities and mutual benefit to refugees and host communities



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Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
	<ul style="list-style-type: none">Highlight successes of social enterprises led by vulnerable women and youthHighlight instances of social cohesion		support provided to refugees and/or aggravate social tensions and risks	



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5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Overview of Stakeholder Engagement Program

The table below presents roles and responsibilities of key actors in stakeholder engagement to be conducted under the project. Detailed methods of consultations to be conducted are provided in Section V below. However, due to Covid19 pandemic, consultations/SEP activities will be either virtual or conducted under the social distancing measures as relevant. The public health measures declared by Ministry of Health in the country will be strictly followed. Specific content to increase COVID 19 risk communication will also be developed under the Project and communicated with stakeholders widely during project implementation.

Non-state (NS):

Beneficiaries

Other non-state stakeholders

State (St):

Implementing Partners

Other state stakeholders

Table 5. Roles and Responsibilities for the Stakeholder Engagement Program

	Subgroup	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Venue	Frequency	Responsible Party
NS	Women and youth from refugee communities	Preparation and Implementation	Non-technical summary of project and its	Beneficiary Dialogues Participatory needs assessment/	To apprise target beneficiaries and communities of project activities,	Localities in target municipalities that are	Once prior to ESMF finalization	
NS NS	Women and youth from host communities							



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NS	Owners of existing social enterprises		environmental and social impacts	planning/Participatory monitoring	potential environmental and social risks	accessible to subgroups		
S	Mukhtars							MoIT PIU
								MoIT PIU



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NS	Private Sector (OIP)	Implementation	Non-technical project summary; press releases, audio-visual stories, project websites and project social media channels	Sourcing platform, official meetings, emails	To communicate successful narratives of social enterprises, entrepreneurship and formal employment; to highlight opportunities for private sector investment in social enterprises for sustainability	Meetings held national and municipal levels	Ongoing	
	Private sector Contractors	Preparation, implementation	PPTs on WB requirements, including procurement and safeguards	<ul style="list-style-type: none"> • Presentations • Public meetings 	Apprise contractors of WB procurement and safeguards requirements	DA offices		
NS	Media (OIP)	Implementation	Press releases, audiovisual stories, project websites and project social media channels; tv/radio tbd	Emails; press conferences	To inform the general public about project's contribution to social entrepreneurship, formal employment, social cohesion, and support to both refugees and host communities		Ongoing	
NS	Public in target areas	Preparation, implementation	Leaflets, posters (in print and online), and videos online and social media	Local information meetings, sectoral meetings,	Discuss, exchange ideas and provide a clear understanding on the description of social entrepreneurship	Target areas in municipalities that are accessible by the general public	Ongoing- prior to sub grant cycles; participatory needs assessments and participatory planning cycles	



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			dissemination, outdoor ads with messages tailored to cities. TV/radio tbd		and the Project's socio-economic benefits to both refugee and host communities; outreach regarding livelihoods facilities to benefit broader communities			
NS	Women and youth from refugee & host communities	Implementation/post completion	Non-technical summary of survey objectives, survey questionnaire, report and PPT on survey findings	Beneficiary perception survey as part of mid- and end- line evaluations	Evaluate beneficiary perceptions of project outcomes and processes		Twice – baseline & completion surveys	MolT/DAs
St	FRIT Steering Committee (Implementing Partners)	Implementation	Emails; progress reports; PPTs; regular briefings	Official meetings	Share information regarding progress and challenges of	MolT Office	Semi-annual	



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					project implementation			
St	Development Agencies (Implementing Partners)	Preparation, implementation	Project appraisal package; draft ESMF, LMP Dissemination materials (leaflets, posters, brochures, FAQs); stakeholder engagement plan	Consultations; information meetings, trainings/workshops; annual assessments of DAs	To provide training and capacity building to promote effective project implementation	DA offices	Ongoing trainings and capacity building under Component 3	
St	Municipal Authorities (Implementing Partners)	Preparation, implementation, post implementation	Non-technical project summary; implementation/plan ning documents; capacity building materials	Consultations, official meetings, workshops	Capacity building; inputs for needs assessments, market assessments, training needs assessments; enagement in participatory selection of livelihoods facilities under Component 2	Offices of DAs/ municipal authorities	Ongoing	Development Agencies
St	Community Implementing Partners (Implementing Partners)	Preparation, implementation	Call for Proposals. project planning/implement ation documents, terms of agreements with CIPs, capacity building materials	Consultations, official meetings, workshops, emails	Terms and guidance on training and mentoring activities for incubation and acceleration, disbursing grants to new and existing social entrepreneurs and post-creation supporting services (included under Component 1) and the community	Offices of DAs/CIPs	Ongoing	



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					mobilization/decision-making and social cohesion activities envisaged under Component 2			
St	DGMM (OIP)	Preparation and implementation	Non-technical project summary; (news release, PAD)	Official meetings	To keep them informed of the project's alignment with Turkey's harmonization strategy and the ESSN exit strategy	Offices of DGMM	Quarterly	
	World Bank (Development Partners)	Planning, implementation	E-mails; media reports (press releases, audio-visual stories, project websites and project social media channels);	Official meetings, site visits/implementation support and supervision missions to the target municipalities	Share information regarding progress and challenges of project implementation; approvals for the project transactions and procurements	MoIT office, WB office, VCs	Quarterly reports, biannual missions, monitoring visits by the CMU as needed	
	EU FRIT (Development Partners)	Planning, implementation	Emails; progress reports; PPTs; regular briefings	Official meetings, site visits	Share information regarding progress and challenges of project implementation	MoIT office, WB office, VCs	As needed	
Component 1								



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	Women and youth from refugee communities	Implementation	<ul style="list-style-type: none"> • Call for Applications for social enterprises • Printed materials in languages accessible to them (posters and brochures) disseminated through existing outreach initiatives (business chambers, existing service points for employment) • Social media and SMS messages disseminated through already available jobseeker pools and channels of local stakeholders. • Interactive scorecard event • For disabled persons who want to engage in the project, the project will include measures for their accessibility. Depending on the disability 	<ul style="list-style-type: none"> • Consultation/public participation meetings • Focus group discussions • Presentations • Capacity building workshops • Grievance redress/beneficiary feedback mechanism • Information desks in CIP offices (either physical or digital) 	<p>Promote enrollment and provide capacity building in the social entrepreneurship incubation and acceleration program</p> <p>To provide feedback, through an annual event and interactive scorecard/community check meeting on the quality of the training and mentoring services</p>	Offices/ locales in the target municipalities that are accessible to subgroups	<p>Prior to each of the approximately 60 cycles of subgrants across three years</p> <p>Annual scorecard event as part of community check meeting</p>	Community Implementing Partners
	Women and youth from host communities							
	Vulnerable groups							
	Existing Social Enterprises							



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			<p>circumstances, house visits may also be utilized as needed.</p> <ul style="list-style-type: none"> For illiterate, verbal and non-technical communication will be utilized in public participation meeting 					
	Community-Based Organizations/ Women's Livelihoods Committees Community members/ leaders		<ul style="list-style-type: none"> Printed materials (posters and brochures) 	<ul style="list-style-type: none"> Consultation meetings Focus group discussions Grievance/beneficiary feedback mechanism Information desks in CIP offices (digital if possible) 	To develop additional social cohesion focused activities with local communities to ensure local relevance and address local challenges.	Localities in target municipalities that are accessible to CBOs and WLCs	Ongoing	
	Male household members and community elders		<ul style="list-style-type: none"> Printed materials (posters and brochures) Capacity building materials 	<ul style="list-style-type: none"> Consultation meetings Focus group discussions Grievance/beneficiary feedback mechanism Information desks in CIP offices (digital if possible) 	Delivery of specialized modules (social enterprises and the benefits for the HH, managing finances and accessing services) to involve male household members and male elders of the community	Localities in target municipalities that are accessible to male household members and community elders	Ongoing	



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Component 2								
	Women and youth beneficiaries from refugee communities	Implementation	<ul style="list-style-type: none"> PPTs Printed materials (posters and brochures) 	<ul style="list-style-type: none"> Participatory planning Grievance/beneficiary feedback mechanism Information desks (digital) in CIP offices 	To convene capacity building and facilitation activities for refugees and host communities to engage in participatory decision-making processes over local needs and priorities for livelihoods-related facilities;	Localities in target municipalities that are accessible to target groups	Ongoing	Community Implementing Partners
	Women and youth beneficiaries from host communities							
	Community Members/Mukhtars							
	Municipal Authorities (Implementing Partners)		<ul style="list-style-type: none"> PPTs Implementation/planning documents Capacity building materials 	Consultations, official meetings, workshops	To ensure local coordination of all project activities and to implement Component 2B; align project support with municipal planning municipalities	Municipal offices		



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5.2 Overview of Stakeholder Engagement Methods

5.2.1 Consultation Meetings

Consultation meetings will be convened with stakeholders including government authorities, municipal authorities, private sector businesses, chambers of commerce, civil society and existing social enterprises etc.

5.2.2 Participatory Engagement Methods

Under Project components 1 and 2, *participatory needs assessments* will be conducted by trained CIP facilitators. These will focus on compiling information from target beneficiaries through beneficiary dialogues, focus group discussions on the economic constraints and opportunities of individuals and groups engaging in social enterprises. The needs assessments will ensure the genuine engagement of target beneficiaries in the identification of their needs and to promote interaction and substantive discussion between refugees and host communities around livelihoods development. The scope of these assessments will cover both incubation and acceleration beneficiaries.

Participatory planning is a process whereby a community undertakes to reach a given socio-economic goal by consciously diagnosing its problems and charting a course of action to resolve those problems. Trained facilitators from the CIPs will conduct outreach and orientation meetings to ensure that target beneficiaries can engage meaningfully in the project. They will also organize participatory planning sessions in collaboration with the municipalities.

5.2.3 Participatory Assessment

Participatory assessments and possible perception surveys will explore citizen's experience and feedback about the project and will be carried out to inform the Project's mid-line and end-line evaluations.

The project will also utilize interactive *community scorecards* - a two-way and ongoing participatory tool for the monitoring of the incubation and acceleration support services. The community score card sessions will bring together Component 1 beneficiaries and CIPs/providers of capacity building services and the project to jointly analyze issues, underlying capacity building constraints, and other project constraints and find a common and shared way of addressing those issues. The scorecard will result in a joint action plan.

5.2.5 Information Desks

Information Desks in DA offices will provide local residents with information on stakeholder engagement and capacity building activities where they can share information about the project with PAPs and other stakeholders. Brochures and flyers on various project related social and environmental issues will be made available at these information desks. Digital information desks would be preferred



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especially for those who have difficulties in accessing these places physically.

5.2.6 Grievance Mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project. Dedicated communication materials (GM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance channels and procedures. In face-to-face meetings, the GM and its details will also be verbally communicated for those who are illiterate. A GM guidebook/manual will also be developed. In order to capture and track grievances received under the project, a dedicated GM Management Information System/database is planned. Internal GM training will also take place for the MoIT PIU and contractor staff. The MoIT PIU's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GM committee works, both in terms of process and deadlines.

5.2.7 Training workshops

Trainings on a variety of social and environmental issues will be provided to MoIT PIU, DAs, contractor staff and possibly relevant CIP facilitators. Issues covered will include sensitization to gender-based violence risks.

5.2.8 Communication Materials

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. The MoIT PIU will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance both in Turkish and Arabic. The website will also provide information about the grievance mechanism for the project.

The project DAs will also have relevant information on the project in their websites, and share communication materials with CIPs, local stakeholders and beneficiaries. DAs will establish effective communication channels with local media institutions regarding the project activities.

5.2.9 Presentations

Visual material will be used in public participation meetings and consultation meetings. Presentations will be made which will be summaries of written documents.

5.2.10 Project Brochure

In the project introduction brochures that will be presented to the stakeholders in the initial stage,



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general information about the project, as well as information about grievance mechanism and liaison/feedback channels will be provided.

5.2.11 Additional methods and measures for vulnerable groups and for COVID 19 pandemic

These methods will also be tailored for any potential vulnerable beneficiary who might be disabled and hence, additional accessibility measures will be taken, as relevant. Such as audio materials for visually impaired or video materials with subtitles for audio impaired as face to face interaction maybe limited under the COVID 19 pandemic circumstances.

The project will also adopt a citizen engagement framework that incorporates a set of structured tools that will be adapted and developed to be implemented under the restrictions of the COVID-19 pandemic. Under Component 1, during implementation, refugees and host community members will be involved, sequentially, in: (i) participatory needs assessments; (ii) participatory skills/training assessments linked to decision making over the form that capacity building will take (e.g. training, coaching, mentoring); and (iii) participatory monitoring and feedback, through an annual feedback event using an interactive community scorecard tool to review and course correct as need be to enhance the quality of the training and mentoring services. These processes will be implemented through a blended approach which incorporates digital (civic technology) solutions, draws on local actors and pays attention to effective facilitation in the COVID-19 context. These processes will build on the beneficiary dialogues undertaken during preparation.

Through Component 2, beneficiaries will engage in a process in which they jointly agree on the priorities for the support facilities that are needed in their communities and neighborhoods to enable them to work (this will be developed at the DA level, linked to the participatory needs assessments at the outset of each cycle). The project will also include: (iv) a beneficiary perception survey that captures perceptions on both outcomes and processes; and (v) a multi-layered grievance mechanism that will enable vulnerable beneficiaries to find an easily-accessed channel to lodge complaints and ensure a timely and objective response. To support women to engage in feedback, the CIPs will appoint community-level ombudswomen to support vulnerable women to report issues that arise. The results of the regular feedback mechanisms (i.e. the complaint and the response) will be discussed by the multi-stakeholder committees, the project steering committee, and during Bank supervision. Through the development of the above tools in the POM, the project will ensure that citizen engagement tools seek depth in engagement, are designed to target the beneficiaries and the vulnerable, are structured for the intended purpose, and occur frequently throughout the entrepreneurship cycle. The project will measure beneficiaries' feedback on whether the social enterprise support system met beneficiary needs, whether the project interventions improved social cohesion, and the effectiveness of the abovementioned citizen engagement activities.

6. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT



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6.1 Elaboration of Key Stakeholder Engagement Responsibilities

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

The MoIT PIU will assume the main responsibility for the coordination, implementation and monitoring and reporting of the SEP's implementation.

Table 6 – Key Responsibilities of key actors/stakeholders in SEP Implementation

Stakeholder	Responsibilities
MoIT PIU- Communications and Stakeholder Specialist	<ul style="list-style-type: none"> Planning and implementation of the SEP Leading stakeholder engagement activities with development partners, the private sector, FRIT Steering Committee, multi-stakeholder advisory platforms, DAs Management and coordination on resolution of grievances Monitoring of and reporting on environmental and social performance to GOT and the World Bank Consolidated reporting on SEP activities for the project overall
Development Agencies	Planning and implementation of SEP activities vis-à-vis: <ul style="list-style-type: none"> Municipal Authorities CIPs Regional and provincial level outreach Reporting on implementation of DA led SEP activities to MoIT PIU Outreach to PAPs/stakeholders in DA Project areas
Local public authorities	<ul style="list-style-type: none"> Make available the disclosed ESMP documents Participation in stakeholder engagement activities arranged by DAs and CIPs, especially pertaining to inputs for needs assessments, market assessments, training needs assessments, and component 2 activities around participatory planning for livelihoods investments
Community Implementing Partners	Planning and implementation of SEP activities vis-à-vis: <ul style="list-style-type: none"> Municipal Authorities Women and youth from refugee & host communities Existing Social Enterprises Community-Based Organizations/ Women's Livelihoods Committees Community members/leaders Other local non-governmental organizations Male household members and community elders Reporting on implementation of CIP led SEP activities to MoIT PIU
Contractors	<ul style="list-style-type: none"> Inform MoIT PIU of any issues related to their engagement with stakeholders Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by MoIT PIU by participating in the local Grievance Resolution Committee Prepare, disclose and implement various plans (e.g. ESMP, Labor Management Plan, etc.) Inform local communities of any environmental monitoring e.g. noise, vibration, water quality monitoring



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	<ul style="list-style-type: none"> Announce important construction activities (such as road closures and available alternatives)
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6.2 Specific Stakeholder Activities According to Project Implementation Cycles

Component 1B Subgrant Implementation:

The Component 1 will directly benefit those receiving startup support services, subgrants, and employment in social enterprises; indirect beneficiaries are the buyers of goods and users of services provided by the social enterprises. Subcomponent 1A will finance support services for social entrepreneurs and Subcomponent 1B will fund subgrants for the incubation or acceleration of social enterprises. The elements of this approach aim to maximize the potential for success of the project-supported social enterprises and enables the participation of less-privileged women and youth in social entrepreneurship.

The main aim of this subcomponent is to support existing and/or new social entrepreneurs through subgrants and provide operational and sustainability support services. The final beneficiaries of this subcomponent will be refugees and host community members that have successfully completed the incubation and/or acceleration services. Successful completion of incubation/acceleration services is defined as attendance of at least 80% of all activities and will be determined by CIPs.

The stakeholder engagement-related activities will be conducted during the implementation of Subcomponent 1B in social enterprises. Below Table 7 shows the summary of roles and responsibilities for this subcomponent.

Table 7 Summary of Roles and Responsibilities for E&S Requirement in Subgrant Implementation

Stages	CIPs	DAs	MoIT/PIU
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Selection	<ul style="list-style-type: none"> - Conduct the initial E&S screening (ineligibility), categorization for the Subgrant applications - Support the applicants to develop ESMPs, when needed (if Moderate risk) 	<ul style="list-style-type: none"> - Ensure initial E&S screening (ineligibility), categorization for the Subgrant applications 	<ul style="list-style-type: none"> - Supervise initial E&S screening (ineligibility), categorization progress - Support preparation of ESMPs and Supervise monitoring of ESMPs, where relevant
Implementation	<ul style="list-style-type: none"> - Ensure project activities are in compliance with ESMF and/or EMSPs requirements - Support women and youth beneficiaries to utilize the feedback channels of the Project (especially to be able to come forward to the CIP community grievance focal point if there are concerns, issues or demands) - Conduct awareness raising on good labor practices, Gender-based violence prevention, environmental and socially sustainable practices (i.e. energy efficiency, zero waste, prevention of child and forced labor etc.) together with the DAs and support of the E&S team in MoIT PIU 	<ul style="list-style-type: none"> - Supervise activities in compliance with ESMF and/or EMSPs requirements, such as mitigation measures on occupational health and safety, environmental protection, zero waste, energy efficiency, decent work and labor practices, effective stakeholder engagement and grievance mechanisms 	<ul style="list-style-type: none"> - Ensure that Project's ESF instruments are fully implemented, and activities supported under Component 1 and 2 are in compliance with the Project's ESF instruments (ESMF and/or EMSPs, Labor Management Procedures, SEP and grievance mechanisms)
Monitoring & Reporting	<ul style="list-style-type: none"> - Monitoring sub-grants and spot-checks including ESMF and/or EMSPs implementations and report to DAs - Provide regular (monthly) reporting on any grievances (also any sensitive issues with full confidentiality –there would be a pass-coded MIS to 	<ul style="list-style-type: none"> - Organize spot checks and site visits in a random sample to monitor E&S performance - Collect regular reports from CIPs to be shared with MoIT for the regular project progress reports 	<ul style="list-style-type: none"> - Monitor implementation of ESMF and/or EMSPs - Prepare and submit Quarterly Progress Reports to the World Bank



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	enter such sensitive grievances if there has been any kind of abuse, sexual harassment) -provide regular reporting on incidents or community grievances or if pandemic situation breaks out that limit the activities undertaken by the CIPs		
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Component 2B DA-Led Cycle:

The first cycle will be organized and on-board and livelihood facilities will be selected by MoIT/PIU and DAs. The selection of first-cycle subprojects will be informed by the consultations conducted with key stakeholders, including host communities and refugees, during project preparation.

The primary goal of DA-led livelihood-related facilities is to establish services and facilities that will be needed. This refers specifically to livelihood facility subprojects that support social entrepreneurship training, mentoring and exchange between entrepreneurs. The DA-led subgrant will facilitate project start-up in targeted provinces according to the results of the Needs Assessments.

Below is a summary of key steps in Cycle 1 led by DAs:

Step 1: Pre-selection of Livelihood Facilities

Step 2: Selection of Livelihood Facilities

Step 3: Implementation of Subgrants Procurement Process for Subprojects

3.1 Submission of Subproject Documentation

3.2 Evaluation of Feasibility Form

3.3 Signature of Memorandum of Understanding

Table 8 DA-Led Cycle: Roles and Responsibilities

DAs	<ul style="list-style-type: none"> • Contact local authorities in areas with high density of Syrian population, and required capacity level • Organize information meetings with local authorities • Conduct field visits and establish a long list of livelihood facilities sub-projects based on agreed pre-selection criteria • Inform local authorities of shortlisted subprojects and support the preparation of subproject information documents and feasibility reports. • Inform local authorities of awarded subprojects and send invitation for signing of subgrant agreements. • Monitor subprojects according to agreed results indicators. • Ensure ESMP/ESMP Checklist to be part of Contractor's Terms of Reference and it is fully implemented on site
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Local authorities/Subproject Beneficiaries	<ul style="list-style-type: none"> Participate in information meetings organized by DAs Identify suitable livelihood facilities based on the criteria described by the DAs Develop subproject ideas in alignment with the local needs and submit subproject information document and feasibility report for shortlisted subprojects Managing the procurement process for the supply of project equipment, materials and small-scale works (with Development Agencies and Contractor of design, supervision and control) Prepare an ESMP/ESMP checklist (Annex F of ESMF) in line with the ESMF requirements Implement the subproject according to the rules and procedures of the SEECO project Supervise contractor for small works (renovation works) in accordance with its contractual obligations (including E&S) Ensure the sustainability of the livelihood facilities after the completion for 5 years from the start of the project.
MoIT/PIU	<ul style="list-style-type: none"> Conduct field visits to the long-listed sites and local authorities to select one subproject and one back up Verify that the long list subprojects meet the pre-selection criteria Select a subproject and alternative applying the agreed selection criteria Prepare subproject visit summary and selection report Provide design and feasibility support services²² to DAs for the subprojects have been shortlisted. Evaluate the feasibility reports and approve the final list of subprojects
Contractor for Design, Supervision and Control	<ul style="list-style-type: none"> Provide design and feasibility support services to shortlisted projects. Provide consultancy to MoIT and DAs for construction tender and implementation Provide supervision and control services Prepare an ESMP/ESMP checklist (Annex F of ESMF) in line with the ESMF requirements Ensure ESMP/ESMP Checklist to be part of Contractor's Terms of Reference and it is fully implemented on site

Component 2B Beneficiary-Led Cycle:

The primary goal of the beneficiary-led cycles is to establish facilities and services that will directly contribute to the potential beneficiaries from both refugee and host community. To ensure that there is a direct connection, these livelihood facilities will be identified and prioritized by a call for proposal method which will be identified by the application guide. The priority areas of the program will be determined through the prioritization activities under the 2A tasks of the CIP. The beneficiary-prioritized livelihood facilities will facilitate the start-up, acceleration and sustainability of social enterprises in targeted provinces.

The beneficiary-led cycles begin with orientation of host community and refugee beneficiaries who

²² Support services will be provided by Design and Supervision consultants engaged by MoIT.





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are reached under Component 2A with other potential beneficiaries and continue through the mobilization of potential beneficiaries. The CIPs will be responsible for facilitating the call for proposal process In the Beneficiary-led Cycle, the beneficiary local public entities shall pay the VAT of their proposed Subprojects.

Below is a summary of key steps in Beneficiary-led Cycle:

Step 1: Preparing potential Beneficiary list

1.1 Mobilization

1.2 Training and Beneficiary Mobilization

1.3 Prioritization Workshop

Step 2: Designing application guidance for call for proposal

Step 3: Call for proposal of Beneficiary-led facility grants/DA

Step 4: Selection of Evaluation Committee members and Sub-project selection

Step 5: Delivery and implementation of sub-grants

Step 6: Sub-project maintenance

In table 9, the Roles and Responsibilities for Beneficiary-Led Cycle are defined below which are tightened onto stakeholder activities.

Table 9 Beneficiary-Led Cycle: Roles and Responsibilities

Potential Beneficiaries of host community and refugees	<ul style="list-style-type: none"> Participate in training on participatory identification and selection of livelihood facilities and be part of selection process. Define challenges faced by social entrepreneurs, particularly those faced by women and youth, and identify solutions Identify priority livelihood facilities to help promote social enterprises and livelihoods Share their needs and expectation with the local authorities
CIP	<ul style="list-style-type: none"> Facilitate joint decision-making of host community and refugee beneficiaries for prioritization of livelihoods facilities Provide training and capacity building support for prioritization process Support host community and refugee beneficiaries in the development of priority subproject proposals in compliance with the pre-selection criteria listed in the SGM, including E&S requirements and find a solution for ESSN recipients Support the DAs to prepare the potential livelihood facility list need of the community use, potential markets, functionality, and sustainability etc. Support the DAs in the monitoring of component 2 activities
DA	<ul style="list-style-type: none"> Organize information meetings with local public entities to explain their roles and expectations in the project Prepare a presentation for call for proposal expectations with MoIT PIU Prepare the potential livelihood facility list Inform local public entities about call for proposal guide priorities Consult potential applicants for preparing and submitting their project proposals Establish and organize the Livelihood Facility Subproject Selection Committee, organize the selection of sub-project beneficiaries, be part of the selection committee



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	<ul style="list-style-type: none"> • Inform local public entities of awarded subprojects and send invitation for signing of subgrant agreements. • Sign sub-project contracts with the local public entitiesSupport the local public entities in their provinces to implement the subprojects. • Monitor subprojects according to agreed results indicators. • Controls and approves data regarding the implementation of Component 2 to Project MIS
Local Public Entities	<ul style="list-style-type: none"> • Participate in information meetings organized by DAs • Conduct need assessment and the feasibility of the facility to prepare proposal • Endorse potential beneficiary needs that meet the endorsement conditions (sustainability potential and building appropriateness) • Ensure alignment with district and province priorities and development plans • Implement the subproject according to the rules and procedures of the SEECO project • Receive the consultancy of DAs in the project preparation and implementation period • Prepare an ESMP/ESMP checklist (Annex F of ESMF) in line with the ESMF requirements • Ensure ESMP/ESMP Checklist to be part of Contractor's Terms of Reference and it is fully implemented on site • The design, supervision and control for small works (renovation works) (including E&S) will be included in the proposal. • Provide the Operation& Maintenance needed to ensure the sustainability of the livelihood facilities.
MoIT/PIU	<ul style="list-style-type: none"> • Participate the information meetings with local public entities to explain their roles and expectations in the project • Prepare a presentation for call for proposal expectations with DA • Review and approve the potential livelihood facility list. • Supervise the call for proposal guide preparation and implementation • Attend the Livelihood Facility Subproject Selection Committee and approve the committee decisions • Supervise the DA in the project implementation process • Supervise the Operation & Maintenance provided by the local public entities • Conduct supervising monitor for subprojects according to agreed results indicators

6.3 Information Disclosure

The MoIT PIU will create a webpage on the Project on its existing website and on the selected DA's websites, through selected CIPs engagement activities, in addition to printed leaflets in Turkish and Arabic. All future project related environmental and social monitoring reports and the Project Operations Manual will be disclosed on the webpages of related DAs. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on this website. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/flyers will be posted on the website. As per the ESF requirements, the information will be disclosed in relevant local languages



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and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups 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). Details about the Project Grievance Mechanism will be posted on the website, as well as contact details of the DA-level project teams and headquarters and CIP focal points at the municipal level. The PIU will update and maintain the website regularly (at least once on a quarterly basis).

6.4 Estimated Budget

The estimated budget allocated for implementing the stakeholder engagement plan over four years is approximately 2,145,000 EUR. 1,050,000 EUR is allocated for community mobilization setting up participatory groups for decision-making for the livelihoods facilities, 275,000 EUR is planned for workshops with different stakeholders and 820,000 EUR for communication and visibility activities.

6.5 Monitoring and Reporting of the SEP

Component 3 of the Project will support monitoring and evaluation (M&E) activities to track, document, and communicate the progress and results of the project, including monitoring of the Stakeholder Engagement Plan. An M&E team within the MoIT PIU will be responsible for overall compilation of progress and results. The PIU will also monitor the quality of the community mobilization and other inclusion, voice and agency activities with communities as measured through community scorecards, which will be discussed and verified along with financial records and project implementation records. Feedback and grievances received through the grievance/beneficiary feedback mechanism will also be included in the semiannual reporting. Finally, the findings of the baseline and end line beneficiary perception surveys will also be included in M&E efforts.

Stakeholder Engagement Plan activities will be monitored every six months and reported in project progress reports biannually.

7. GRIEVANCE MECHANISM

The Grievance Mechanism (GM) is a process that allows any stakeholder to submit a complaint, raise a concern or provide feedback, such as suggestions, inquiries and compliments, regarding the planning, implementation or management of a project.

SEECO has established a transparent and comprehensive GM to receive, evaluate and handle grievances and feedback in compliance with the World Bank's Environmental and Social Standards (ESS). The GM is a key project tool to mitigate, manage, and resolve potential or realized Project impacts, as well as fulfil obligations under international standards and create positive relations with people affected by the Project, employees and other interested parties. Additionally, the GM provides timely input to the PIU on Project challenges and allows for effective identification of issues that need to be addressed.



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Therefore, a *Grievance Mechanism Manual* has been prepared by the SEECO Project Implementation Unit (PIU) with the purpose of outlining the critical elements of the project-specific stakeholder GM and the separate GM for project workers.

7.1 Who Can Use the SEECO GM?

All project stakeholders will have access to the GM, which includes **project affected parties**²³ (refugees, host community members, social enterprise employees, contractors, project staff, government authorities) and **other interested parties** (private sector, NGOs, media, etc.).

The targeted audiences of the GM include but are not limited to are:

- Project's beneficiaries
- Communities that could potentially be affected by the construction/renovation activities at the buildings
- CIPs and CCs Workers
- Members of the PIU
- Other parties (NGOs, etc.)

Project stakeholders have, among others, the following rights under the Project:

- Right to information
- Right against inappropriate intervention by an outside party
- Right to a project free of fraud and corruption

Project stakeholders may file a grievance and provide feedback if s/he believes one or more of these rights have been infringed, or if any of the Project's principles and procedures have been violated.

7.2 Purpose and Scope

The objective of the GM is to assist in the resolution of grievances in a timely, efficient, fair and transparent manner that gives credibility to the process and contributes to lasting outcomes. It also aims to build trust and cooperation between project implementing partners and stakeholders. Specifically, the GM aims to:

- provide affected people with avenues for providing feedback, including submitting a grievance or resolving any dispute that may arise during the course of the implementation of projects.
- ensure that appropriate and mutually acceptable actions are identified and implemented to the satisfaction of complainants.
- support accessibility, anonymity, confidentiality and transparency in handling complaints and grievances.
- support the complainant's need to apply judicial proceedings if they are dissatisfied with the GM.
- reduce conflicts and risks such as external interference, corruption, social exclusion or mismanagement.

²³ Those who are likely to be directly or indirectly affected positively or negatively by the Project.





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- improve the quality of project activities and results by serving as a feedback and learning channel for project management regarding the strengths and weaknesses of project procedures and implementation processes.

Currently, the DAs and MoIT receive formal requests and grievances through the Presidential Communication Center (CIMER), Foreigners Communication Center (YIMER) or directly through DA web channels. Given that all kinds of complaints are received by CIMER/YIMER from the public and tracing project-specific requests, concerns or complaints will be difficult, it was considered necessary to establish a project-specific grievance mechanism for all stakeholders, directly or indirectly affected by the Project to ensure compliance with World Bank ESS10.

The GM for the SEECO Project is being established based on the following guiding principles:

Fairness: Grievances will be treated confidentially, assessed impartially, and handled transparently.

Objectiveness and independence: The GM will operate independently of all interested parties to guarantee fair, objective, and impartial treatment of each case. The GM officials will have adequate means and powers to investigate grievances (e.g., interview witnesses, and access records).

Simplicity and accessibility: Procedures to file grievances and seek action will be simple enough that project beneficiaries can easily understand and access them. The Project beneficiaries will have a range of contact options including a telephone number, an e-mail address, a postal address, and the ability to submit grievances in-person. The GM will be accessible to all stakeholders, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income. The GM will not use complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices).

Responsiveness and efficiency: The GM will be responsive to the needs of all complainants. Accordingly, officials handling grievances will be trained to take effective action and respond quickly to, grievances and suggestions.

Speed and proportionality: All grievances, simple or complex, will be addressed and resolved as quickly as possible (within 15 days unless otherwise communicated to the claimant). The action taken on the grievance or suggestion is swift, decisive, and constructive.

Participatory and social inclusion: A wide range of project-affected people - refugees, community members, members of vulnerable groups, project implementers, civil society, and the media—will be encouraged to bring grievances and comments to the attention of the project authorities. Special attention will be given to ensuring that refugees, and marginalized groups, including those with special needs, are able to access the GM, by providing the opportunity to submit grievances verbally directly to CIPs on site.

Confidentiality and anonymity: All grievances/feedback received will be treated with respect to dignity, rights, wishes and choices of complainants and strictly observe confidentiality at all stages of the process. The GM will allow anonymous complaints through its different intake channels to ensure all people feel safe when raising sensitive issues or situations that they may feel the risk of retaliation.

The **Project Stakeholder GM** is complementary to other project-specific feedback-seeking and engagement activities defined in this SEP. In parallel, the MoIT PIU is setting up a **Grievance Mechanism for project workers**, including staff of MoIT, DAs and contracted workers. The GM for project workers is being established in line with the Project Labor Management Procedures (LMP) and



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ESS2 (Labor and Working Conditions) requirements.

7.2 Eligibility of Complaints

The following criteria will be used to assess and verify the eligibility of the complaints when they are received by different intake channels of GM;

- The issue is within the Implementing Agency's mandate and falls within the scope of the GM
- The complainant is anonymous or identifiable with a name and contact details provided
- The complainant is affected by the SEECO project
- The grievance is clear;
- The complaint has a direct relationship to the SEECO project or activity; and
- All the mandatory preliminary information is available.

The purpose of this step is to ensure that the issue being raised is relevant to SEECO or its activities. If the complaint is not eligible, the complainant will immediately be informed of the reasons. The assessment at this step will also enhance decision-making as to whether the complaint should be directed to a different entity.

7.3 Grievance/Feedback Intake Channels

The GM offers several different channels for providing feedback. Beneficiaries and other interested parties can decide on the most appropriate means of raising their complaints, concerns or requests based on their preference. In order to capture and track grievances received under the Project, a dedicated Feedback Management Information System (FMIS) will be established.

Within the scope of SEECO, grievances/concerns/suggestions will be handled at the following four levels: (a) community level; (b) construction contractors' level; (c) regional DAs level; (d) central level MoIT Project Implementation Unit (PIU). This feedback provider/complainant can also submit his/her concerns/grievances through existing channels/avenues such as CIMER/YIMER or the judiciary, which are outside the project-level GM.

- Community Level. To ensure that the GM is accessible to people at the community level, they will have the option to report their complaints/feedback to designated *grievance focal points* who are staff in the CIPs. To support women to engage in feedback, the CIPs will appoint community-level ombudswomen (who could also be GM Teams) to support vulnerable women to report issues that arise.
- Construction Contractors (CC) Level²⁴: CCs will appoint designated GM focal points to transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by DAs/MoIT PIU.
- Regional/DA Level. DAs will have appointed GM focal points that can either receive feedback directly from stakeholders or to whom the community level GM focal points can escalate issues/complaints.
- Central/PIU Level. Feedback providers have the option to contact the PIU directly with any project related complaints, including for the purpose of escalating an issue that has not been

²⁴ The Construction Contractors will provide an office to receive the Project related feedbacks/grievances.





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addressed at a lower GM level. The PIU's Social Specialist is assigned as a GM focal point and s/he will be responsible for the overall coordination and monitoring of GM. The MoIT/PIU Team will make a final decision after a thorough review of the investigation and verification findings and if required, a grievance commission consisting of PIU Members (SEECO Project Coordinator, SEECO Social Specialist, MoIT Specialist and DA Specialist from the area where the complaint is received) will be established for more complex cases.

The GM focal point at each level will be responsible for performing the functions required for all types of grievances (stakeholder grievances, worker grievances and SEA/SH related grievances) that will be explained separately in further sections. The list of the GM focal points assigned at each level including their contact information is given in Annex 5.

The grievance form provided in Annex 3 is the standard form for submitting grievances, although grievances can also be submitted in-person verbally (to GM Focal Points of CCs and CIPs). The submission of anonymous grievances is also possible in case of the confidentiality needs of the claimer.

Grievance numbers and topics will be disclosed publicly in quarterly periods in aggregate format and without identifying the features of the claimant. The identity of all those who have filed grievances will be treated confidentially. There will be no charge for filing a grievance.

7.4 Responsible Parties

Ministry of Industry and Technology and Project Implementation Unit (MoIT/PIU)²⁵ will take overall responsibility for the GM and act as the main implementing party.

The following parties will be involved in the grievance management process of the Project with differentiated roles and responsibilities assigned to each as described in Table 1.

- MoIT
- DAs
- Community Implementing Partners (CIPs)
- Local authorities
- Construction Contractors (CCs).

GM focal points will be appointed at each level. Focal points will lead grievance investigation (as needed) or will convey the investigation to specialized departments, which could include collecting relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, and other activities required to address the grievance. Investigation findings will be used to document the decision-making process and inform the proposed remedy. The GM focal points, particularly those at the community level, will also provide assistance to the claimants who need help during the GM application process to submit their grievances.

This GM Manual describes the roles and responsibilities of each grievance intake level in detail to ensure the successful implementation of the GM procedures. MoIT will lead the overall project

²⁵ The list of GM Focal Points, is given in Annex 5, which includes specialist from MoIT/SEECO/DA





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grievance management and reporting, and provide training and support to all other intake levels as necessary.



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Table presents the responsible parties and their roles/responsibilities for the GM implementation.

Table 10. Responsible Parties in GM Implementation at Each Defined Level

Responsible Party	Responsibilities
Ministry of Industry Technology and Project Implementation Unit (MoIT/PIU)	<ul style="list-style-type: none"> Ensures that stakeholders have access to the Project GM and PIU consultants have access to the worker GM. Overall implementation, management, and coordination of the GM are in line with this Manual. Train, guide and assist all GM parties to ensure the successful implementation of this GM Manual. Continuous monitoring of the GM system to ensure that grievances are being managed in line with the procedures described in this GM Manual. Quarterly grievance reporting to the World Bank and publication of aggregate grievance data on the Project website.
GM Focal Point of the PIU	<ul style="list-style-type: none"> PIU Social Specialist will act as the GM focal point for the Project Reviewing, and classifying grievances (eligible and/or related to Project activities) together with relevant member(s) of the PIU, and responding as appropriate. Establishing the main GM register and monitoring system and following up on all grievances relevant to the Project. Managing and coordinating the resolution of grievances within the Project. Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding the stakeholder engagement and other Project activities and coming up with corrective actions. Recording verbal concerns and grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). Ensuring that all grievances, including those received verbally, are correctly registered into the MIS. Submitting the record of the concerns and grievances to the Project Manager. Coordinating and supporting the GM focal points at other levels. Consolidating Project-related requests received from different GM levels. Informing the PIU and the management about the resolution process. Preparing consolidated GM reports of the Project. Coordinating stakeholder engagement activities as specified in Project's Stakeholder Engagement Plan (SEP).
GM Focal Points of the Development Agencies	<ul style="list-style-type: none"> Ensures that stakeholders have access to the Project GM. Receiving project related requests (complaints, compliments, feedback, inquiries for information, etc.).



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	<ul style="list-style-type: none"> Evaluating and addressing the complaints whichever falls into their area of responsibility. Recording verbal concerns and grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). Then register these grievances into the MIS Submitting the record of the concerns and grievances to the Project Manager. Recording each request whether they are addressed or not on the register and monitoring system through MIS regularly. Immediately notifying the MoIT/PIU of sensitive grievances (when permitted by the claimant in case of SEA/SH complaints).
Local Authorities	<ul style="list-style-type: none"> Receiving project related requests (complaints, compliments, feedback, inquiries for information, etc.). Forward the Project related requests to the related DAs as per mutually agreed procedures Participation in stakeholder engagement activities arranged by DAs and CIPs if necessary.
Environmental and Social (E&S) Specialists of the Community Implementing Partners	<ul style="list-style-type: none"> Ensures that stakeholders have access to the Project GM. Receiving, recording and if applicable, resolving the concerns and grievances. Recording verbal concerns and grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). Then register these grievances into the MIS Submitting the record of concerns and grievances to the Project Manager. Recording resolution of grievances and reporting these to the GM Focal Point of the DA/PIU in their regular progress reports. Immediately notify the DAs if complaints cannot be solved within internal sources (major injuries, sensitive complaints etc.).
Construction Contractor	<ul style="list-style-type: none"> Ensures that stakeholders have access to the Project GM. Receiving, recording and if possible, resolving the concerns and both workers' and stakeholders' grievances. Recording verbal grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). Evaluating and addressing the received applications together with the Contractor's E&S specialist/OHS Specialist or if deemed necessary the management of the contractors and the Project Managers will involve in the resolution process of the applications. Immediately notify the DAs (then MoIT/PIU) if complaints are sensitive grievances. Submitting their grievance related documents to DAs monthly to register into MIS.



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7.5 Dissemination of Information Regarding the GM

To ensure GM transparency and accessibility, a comprehensive set of communication tools (both Turkish and Arabic) will be in place targeting the Project stakeholders (government staff, public administrations, citizens and Project workers). The communication tools to disseminate information on GM will include the following but not be limited to;

- Informative leaflets, posters
- Official letters, correspondences
- Announcements on notice boards, public places and the official Project' website
- Consultation meetings with project beneficiaries, workers and other stakeholders
- Trainings with beneficiaries, CIPs and CCs

Dedicated communication materials (pamphlets, posters) will be created to help local residents familiarize themselves with the grievance channels and procedures. In face-to-face meetings, the GM and its details will also be verbally communicated to those who are illiterate. During the implementation of the Project, printed copies of the Grievance/Suggestion Form will also be available in the DAs, CIPs and CCs offices at construction sites and related government authorities and neighborhood representatives (Muhtars). In addition, the Grievance/Suggestion Form for the project is publicly available on the project website²⁶ and the webpages of the relevant government institutions included in the Project DAs and municipalities. MoIT/PIU will also conduct biannual GM trainings with representatives of the beneficiaries, CIPs and CCs. Information about the GM, including contact details, will be distributed in all participating areas at public meetings through brochures/pamphlets in Turkish and Arabic to the extent possible, and posted at relevant project sites such as the Turkish Development Agencies (DA) buildings, Community Implementing Partners (CIP) training venues, beneficiary municipalities building and funded livelihood centers.

7.6 Grievance Procedures

There are separate GM procedures for Project stakeholders (project affected parties and other interested parties) and for Project workers and special considerations for managing sensitive grievances. Detailed explanations of these separate GM procedures are described in the GM Manual.

The manual includes, the types of eligible grievances, the feedback intake locations and channels, the resolution timelines, grievance procedures to be followed, monitoring and reporting arrangements and responsibilities for each task to ensure accountability in the grievance management process.

²⁶ <http://sosyalgirisimcilik.gov.tr/> or <https://sosyalgirisim.gov.tr/>





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7.6.1 Stakeholder Grievances

The process for grievance management comprises 6 steps: (1) uptake; (2) sort and process; (3) acknowledgement and follow up; (4) verify, investigate and act; (5) response; and (6) feedback and monitoring. These have been described in detail in the GM Manual. Project stakeholders will have the opportunity to provide feedback and report complaints through several communication channels (in-person, mail, telephone, project website, CİMER/YİMER)) at different levels. Responsible parties for each communication channel are defined below.

- **In-Person:** DAs, CIPs, Contractors and Related Governmental Offices
- **Project Email and Website:** PIU, DAs, CIPs GM Team
- **Phone:** PIU, DAs, CIPs GM Team²⁷
- **Free Hotline:** 0 312 201 66 20 (PIU GM Team)
- **CİMER and YİMER:** PIU GM Team

Figure 3 shows the operational flow of the Grievance Mechanism for project stakeholders.

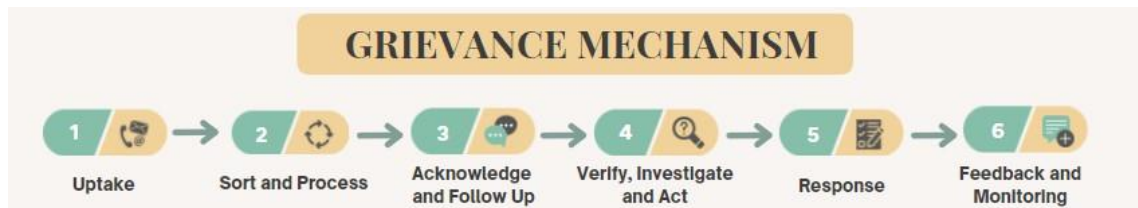


Figure 3. Operational Flow of GM

7.6.2 Workers Grievances

The GM for the SEECO project will have separate channels for the submission of complaints/feedback/workplace concerns by Project workers as described in the LMP and SEP documents of the Project. The GM will work together with existing grievance mechanisms available to civil servants at the Ministry level. Civil Servants Code and its relevant regulation provide a grievance procedure for civil servants. According to Article 21 of Law No. 657 (Civil Servants Law); Civil servants have the right to file a complaint and file a lawsuit against their institutions. Appeals and complaints (letter of application, petition etc.) are made by submitting the complaints to the next superior in the hierarchy after the employee's direct superior. Applications and complaints are examined and notified to the relevant party as soon as possible. The complaint must be concluded within 30 days, from the date of receipt of the first disciplinary supervisor authorized to decide. Civil Servants who exercise their right to complain cannot be fined for their complaints. The Project workers' grievance mechanism will not prevent workers to use the conciliation procedure (Law on Labor Courts, numbered 7036 published in the Official Gazette dated 25.10.2017- Article 3) provided in Turkish Labor Legislation.

The Grievance Mechanisms for Project Workers will be established within relevant institutions (MoIT, DAs, CIPs and contractors) to allow all **direct** and **contracted workers** to raise workplace related

²⁷ Related communication information is shared in Annex 5. The information will be updated.





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concerns²⁸. Under SEECO, the categories of project workers have been identified in the [Labor Management Plan](#) (LMP). The grievances raised by the consultants engaged by MoIT PIU will be received and registered by the GM Focal Point of the PIU, while the grievances raised by DA employees/consultants will be received and registered by the GM Focal Point of the DA. CIPs and Construction Contractors (CCs) will be required to establish a Workers' Grievance Mechanism before mobilization and at the very latest before the commencement of works at site. The grievances of contracted workers at CIPs and CCs will be received and registered by the assigned GM Focal Point and will be handled/managed by the assigned GM Team of the CIP or CC. The mechanisms that will be available if a direct or contracted worker would like to submit a complaint is described in detail in GM Manual.

7.6.3. Mechanism for Addressing SEA/SH Related Grievances

Managing grievances related to sexual exploitation or abuse (SEA), sexual harassment (SH), and other forms of gender-based violence (GBV)²⁹ requires a different approach than other types of concerns raised through project-level grievance mechanisms due to the topic's sensitive nature; the potential for survivors to experience stigma, rejection, or harm; and because of the reluctance of many survivors to come forward and report cases. The specific nature of SEA and SH necessitates tailored measures for the reporting and safe and ethical handling of such allegations through grievance mechanisms.³⁰ In response to this need, the SEECO project will adapt the Project-level grievance mechanism to allow for the uptake of sensitive grievances with dedicated operating procedures and response protocols for SEA/SH related grievances.

As specified in the World Bank's Good Practice Note on GBV in Major Civil Works, a SEA/SH Prevention and Response Action Plan is recommended for projects with moderate, substantial and high-level SEA/SH risk ratings. Considering the contextual risks and increased GBV incident rates among both refugees and host population women in Türkiye, the SEA&SH risk rating of the Project is assessed as Moderate and therefore the *Action Plan to Prevent Gender-Based Violence* is prepared by SEECO PIU to serve as a guidance document for handling SEA/SH risks in project implementation.

SEA/SH grievances in projects are sensitive due to secondary victimization, repeated trauma, and the risk of retaliation against the survivor or other persons reporting such cases. Therefore, the Project-level grievance mechanism is structured to be sensitive to the needs of SEA/SH survivors. MoIT represented by the SEECO PIU, its contractors, and sub-contractors involved in MoIT projects/operations has a zero-tolerance policy towards acts of SEA against project beneficiaries and affected communities and prohibits SH of project workers.

While handling SEA and SH complaints, the GM will ensure; (i) referral to survivor-support services (health, psychological, legal aid, etc.), based on the consent, needs, and wishes of the survivor; (ii)

²⁸ Detailed information was given in 5 Responsible Parties.

²⁹ *Sexual exploitation*: Any real or attempted abuse of a position of vulnerability, power differential, or relationship of confidence for a sexual purpose, including, but not limited to, taking financial, social, or political advantage of another through sexual means.

Sexual abuse: Real or threatened physical intrusion of a sexual nature, whether it be by force or under unequal or coercive conditions.

Sexual harassment: Sexual advances, demand for sexual favors, or any other verbal or physical behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

³⁰ Interim Technical Note, Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed projects, World Bank, April 2020.





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linkage to the domestic legal system; and (iii) internal inquiry by the MoIT, its contractors and sub-contractors to determine the likelihood that the allegation relates to the SEECO project.

Step-by-step procedure for handling SEA/SH-related grievances is provided in GM Manual and GBV Action Plan prepared for the project.

7.7 Appeal Mechanism

If the grievance cannot be resolved despite all the efforts made and actions taken, the GM focal point of PIU will notify the complainant about the resolution by summarizing the corrective actions taken and explaining the resolution process of the complaint and informing the complainant of other alternatives. At all times, complainants may seek other legal remedies in accordance with the Turkish legal framework.

Applicants whose complaints could not be resolved through existing GM or whose complaints contain sensitive issues can always apply to the relevant legal institutions. Such institutions can be summarized as follow:

- CIMER
- Civil Courts of First Instance
- Administrative Court
- Commercial Courts of First Instance
- Labor Courts
- [Ombudsman](#)

7.8 World Bank Grievance Redress System

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 mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

7.9. Monitoring and Reporting

The MoIT GM focal point will be responsible for:



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- Collecting and analyzing the qualitative and quantitative data to be obtained from grievance focal points on the number, category, substance and status of complaints as well as provision of timely response, proper documentation and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GM mechanisms to the Project Coordinator at the PIU.

Quarterly reports to be submitted by the PIU shall include a section related to GM which provides updated information on the following:

- Status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on the number of received grievances \ (applications, suggestions, complaints, requests, positive feedback), 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 are taken.

7.10 Grievance Monitoring Through MIS

The GM reporting structure will be reflected in the Project MIS, which is yet to be developed. Once available, the PIU, CIPs, DAs and CCs will record grievances/feedback directly into MIS. Upon grievance receipt, they will classify and transfer to the responsible party if relevant or respond to the claimant and thereafter record the actions taken in MIS to resolve the grievance. PIU will manage the aggregate number of grievance submissions and resolutions by recording this information in a detailed list/report in MIS.

Annex 1. Sample Grievance Form and Grievance Closeout Form

GRIEVANCE FORM		
Name of person receiving grievance:		Date:



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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			



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GRIEVANCE CLOSEOUT FORM		
ASSESSMENT OF THE GRIEVANCE		
Corrective Action Required:	<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)	



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Annex 2. Summary of Key Comments from Stakeholders

Item	Institution	Comments
1	Mersin Metropolitan Municipality	The Project should give special focus on increasing institutional capacity of civil society organizations and enhancing social cooperatives.
2	Gaziantep Metropolitan Municipality	Budget should be allocated among provinces with respect to Syrian population within each province.
3	Şanlıurfa Metropolitan Municipality	Budget should be allocated among provinces with respect to Syrian population within each province. Sustainability of the Project depends on the active participation of the local authorities and NGOs in the regions.
4	GAP Regional Development Administration	Facilities to be built within the scope of the Project should be located not in the city centers but in places close to where Syrians and disadvantaged populations mostly live. Our centers are located accordingly and can be used if needed.
5	International Organization for Migration (IOM)	We are implementing similar programs and projects together with ILO. From our experience, release and advertisement of the Project was very important in order to get sufficient applications. Also, there is a risk of ending up with projects of host communities. For that case, we have to work case by case and use some facilitating conditions to increase applications from Syrians.
6	Support to Life Association	<p>We may need you to organize a few workshops on the procedures and rules of the World Bank.</p> <p>It would be great if we can build partnerships with government organizations or chambers.</p> <p>A platform to publish information about the activities and success stories of civil society organizations can be useful.</p>



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7	Entrepreneurship Foundation	<p>It would be great if a number of CIP's can build partnerships and apply to the project together.</p> <p>A person/entity that achieved support in one cycle should be able to get support in the next cycle too. We should also focus on increasing the entrepreneurship mentality among people in addition to creating new entrepreneurs.</p>
8	Human Development Foundation	<p>Project should have healthy performance indicator and monitoring system in order to perform impact analysis after project implementation.</p> <p>Private sector participation is also very important for achieving the long-term goals and sustainability of the project.</p>
9	Istasyon TEDU	<p>Cycles of 6 months seems a little short, we believe longer cycles can create a larger impact.</p> <p>We also believe that analyses to be carried out within the scope of this Project should be comprehensive and more general and for longer term, not for only those provinces and for limited areas of research. In this respect, a mapping of social entrepreneurship can be useful.</p>
10	CARE Turkey	<p>How long is the project's duration?</p> <p>Answer: Project implementation expected to take 4 years.</p>
11	Hatay Metropolitan Municipality	<p>Can Women's Cooperatives be eligible under subgrant support?</p> <p>Answer: Yes, Women's Cooperatives are eligible institutions.</p>
12	SSGD-ASAM	<p>When will ToR for CIP's be announced?</p> <p>Answer: After effectiveness of the project, MoIT PIU and DAs will start working on ToRs. It's expected that ToRs will be finalized and disclosed until July 2021.</p>
13	SSGD-ASAM	<p>Only Syrians under temporary protection can apply to subgrants? Will also refugees under International Protection be eligible for subgrants?</p> <p>Answer: While project has clear focus on ESSN recipients, other refugees is also eligible to subgrants</p>
14	Bir Dünya Üreten Women's Cooperative	<p>Will project application for subgrants be submitted to CIP's?</p> <p>Answer: Yes CIPs will be responsible for beneficiary mentoring, project development support and project assessment.</p>



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15	IOM	Can UN institutions take a part in part in project as a stakeholder? Answer: UN institutions can take a part in project in a various way. They could be CIP or they take a part in activities in Component-3 activities.
16	Sur Municipality	Do municipalities have to provide co-financing in order to benefit from livelihood facilities subgrants? Answer: No, currently project doesn't seek for co-financing.
17	Tomurcuk Hearing Impaireds Associations	Will there be any specific study on disabled Syrians? Answer: Project's main target group is refugees with vulnerabilities. In this regard whole project take existing problems within disabled communities into account. We expect that many activities within different components address the issue and come up with innovative and needed solutions
18	Şahinbey Municipality	Will municipalities submit their livelihood facilities project proposals to Development Agencies? Answer: Yes, they will submit their proposals to DA's and DA's will assess project proposals.
19	SSGD-ASAM	What are the expectations from CIP's under Component-1? Answer: CIP responsibilities will include organizing the selection process for refugee and host community members to enter the social entrepreneurship program; approval of microenterprise business plans; training, mentoring, and coaching activities for incubation and acceleration, and post-creation/post subgrant supporting services (included under Subcomponent 1A); and the community mobilization and social cohesion activities envisaged under Subcomponent 2A
20	Governorship of Şanlıurfa	Is it possible to follow project on social media? Answer: Yes, social media accounts of the project will be activated soon.



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Annex 3. List of Participants

Consulation Meeting (25/11/2019)



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SANAYİ VE TEKNOLOJİ BAKANLIĞI Kalkınma Ajansları Genel Müdürlüğü

Toplantı Katılım Tutanağı

Tarih: 25/11/2019

Yer: Sanayi ve Teknoloji Bakanlığı

Konu: SEECO Proje Pazarı Katılım Toplantısı

No	Ad- Soy Ad	Görevi	Görev Yaptığı Kurum	Telefon
1	Barış KAPATİME	Göç İstati. Şub. Md.	Sarıyer Belediyesi Bld.	
2	Mehmet ERDURUMLUOĞLU	Proje Uzmanı	Gaziantep Büyükşehir Bld.	
3	Cihan Arslan	Uzman	İKA	
4	Serdar SARIKAYA	Sos. Hiz. Şb. Md.	Mardin Büyükşehir Belediyesi	
5	Hilmi Dulkadir	Şube Md.	Mardin Büyükşehir Bld.	
6	Ayşen HALIÇ	M501 (Muhtarl. Hk.)	Adıyaman Belediyesi	
7	Emir Yaprangılı	Proje Müdürü	Uludağ Büyükşehir Bld.	
8	Serdar Kaya	Uzman	G.K.A	
9	Esma Karahaydar	Uzman	Gülurpa Kalkınma Ajansı	
10	Elcin İbrazim	Uzman	İTİT	
11	Emel Akkaya	Genel Koordinatör	CAP T.C.	
12	Selin ÖZER	Genel Koordinatör	CAP - BKİ	
13	Sevriye Aydemir Kaya	Program Yürütücüsü	BH Kadın Birliği	
14	Öğüt Akkaya	Birim Başkanı	Doğru Akademi Kalkınma Aj.	
15	Mehmet ERDAL	İstatistikçi	Kılıç Bld.	
16	Emir Kaya	Uzman	Karacadağ Kalkınma Aj.	
17	Emir Akkaya	Birim Başkanı		
18	Emir Akkaya	Uzman		
19	Tuna TURNA	Ticaret Uzmanı	Ticaret Bk. Ks. Şu. Kuvveti	
20	Harun Akdoğan	Gözetim Uzmanı	ACST Bk. / Kuvveti	
21	Berk ÖZGÜR	Uzman	Dinle Kalkınma Ajansı	
22	Suat UGAR	Uzman	İKA - Dicle Kalk. Aj.	
23	Ömer İM	Uzman	Dizirli Bk. - Akad. Bk.	
24	Yıldırım Devlet Karapinar	Prog. Kord.	TOM	
25	Melis Kılavuz	Kıdemetli Proje Asistanı	TOM	



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SANAYİ VE TEKNOLOJİ BAKANLIĞI Kalkınma Ajansları Genel Müdürlüğü

Toplantı Katılım Tutanağı

Tarih: ~~26/11/2019~~ 26/11/2019

Yer: Sanayi ve Teknoloji Bakanlığı

Konu: SEECO Proje Paydaş Katılım Toplantısı

No	Ad- Soy Ad	Görevi	Görev Yaptığı Kurum	Telefon
1	Binnur Çelebi	Danışman Kurulu Üyesi	IN/GEU	
2	Mehmet Erhan Yılmaz	Proje Asistanı	MEKTA KAKFI	
3	Alper YALKIN	Kalite Yöneticisi	MEKTA KAKFI	
4	Ömer Akkurt	Proje Asistanı	Doğuş Akademi Kalkınma Ajansı	
5	Mehmet ÖZGÜL	Uzman	Karadeniz Kalkınma Ajansı	
6	Esma Karadağlı	Uzman	Çukurova Kalkınma Ajansı	
7	Gökçe Kaya Öntaşbaşoğlu	Simülasyon / Doc. Dr.	Akdeniz Sosyal Bilimler Üniv.	
8	Serdar Kaya	Uzman	G.Ü.İ.İ.	
9	Cihangir Arslan	Uzman	İKA	
10	İdris Yılmaz AVSAR	Araştırmacı	TEPAV	
11	Ömer KARALOY	Politika Analisti	TEPAV	
12	Mustafa İSLEK	Özellik Kay. Prog. Yöneticisi	HAYATA DESTEK	
13	Bayram ÇELİK	İtibe Yöneticisi	HAYATA DESTEK DER.	
14	Suati Uğur	Uzman	DİKA	
15	Berk ÖZGÜR	Uzman	Dicle Kalkınma Ajansı	
16	Burcu Güneş Tosun	Raporlama sorumlusu	RİST International	
17	Zeynep Güneş Tildizli	Proje Koordinatörü	SGDD-ASAM	
18	Fahri Çelebi	Asistan	DEİ	
19	Mehmet AMER	Genel Müdür	GİRİŞİMÇİLİK AKADEMİSİ	
20	Gökçe Toprak	Proje ve İletişim Sorumlusu	KUSİF	
21	Tolga Aktepe Örsün	Proje ve İletişim Sorumlusu	KUSİF	
22	Berhan Eliz	Yönetici	İstasyon Tesisleri	
23	Emre G. Göçer	Projeler Koordinatörü	İstasyon Tesisleri	
24				
25				



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SANAYİ VE TEKNOLOJİ BAKANLIĞI Kalkınma Ajansları Genel Müdürlüğü

Toplantı Katılım Tutanağı

Tarih:

Yer:

Konu:

No	Ad- Soy Ad	Görevi	Görev Yaptığı Kurum	Telefon
1	ILGEN SERİFEREN	SDP-PR	San. Bşk.	
2	Günel ERSALIN	San. Tek. Uzmanı	" "	
3	Özge Nergis GÖKTAS	Uzman Yard.	" "	
4	Özlem TAŞKIN	İBMMYK - Uzman	Yetkinlik Pasaportları	
5	İzzet Aytekin	Uzman	Sanayi Bakanlığı	
6	Filiz Akar	" "	" "	
7	Ahmet Samiye	Dei. Bşk.	" "	
8	Meltem Fırat Özgen	Uzman	" "	
9				
10				

Second Consultation Meeting (25/01/2021)

Adıyaman Municipality
MEKSA Vakfı
Mersin Metropolitan Municipality
Düziçi Municipality
SGDD-ASAM
Erdemli Municipality
İpekyolu Development Agency
UN Women
Adıyaman Municipality
Türk Kızılay Kahramanmaraş Community Center
Midyat Municipality
INGEV
CARE Turkey
RET
Çukurova Development Agency
Gaziantep Metropolitan Municipality
Yeryüzü Doktorları Derneği
Uluslararası Göç Örgütü (IOM)
RET International



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Mardin Family, Labor and Social Services Provincial Directorate
Dicle Development Agency
İstasyonTEDÜ Social Innovation Center
Türk Kızılay Mardin Community Center
Türkiye Kızılay Derneęi
Sığınmacılar ve Göçmenlerle Dayanışma Derneęi SGDD-ASAM
Mardin Metropolitan Municipality
Nusaybin Municipality
UNHCR
Karacadağ Development Agency
Welthungerhilfe-WHH
Hatay Metropolitan Municipality
Karacadağ Development Agency
Adana Sarıçam Municipality
Seyhan Municipality
Türk Kızılay Adana Community Center
Eastern Mediterranean Development Agency
İKA AYDO
Lider kadın derneęi
Türk Kızılay Çocuk Programları Koordinatörlüęü
Lice Municipality
Sur Municipality
Erdemli Municipality
Seyhan Municipality
Silifke Municipality
MARDİN TOPLUMSAL KATILIM VE GELİŞİM DERNEęİ
Şanlıurfa Governorship
Diyarbakır Provincial Migration Management Directorate
Dicle Municipality
KAGİDER
Welthungerhilfe
Bir Dünya Üreten Kadın Girişimi Üretim Ve İşletme Kooperatifi
Habitat Derneęi
UNHCR
Adana Governorship EU and External Relations Office
Diyarbakır Metropolitan Municipality
IOM



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GBB
RET Germany
CARE International in Turkey
Innovation for Development
Yüreęir Municipality
Türkiye Kadın Girişimciler Derneęi
Şahinbey Municipality
Şanlıurfa Governorship
Dulkadiroęlu Municipality
Tomurcuk Sağır ve Engelliler Derneęi
Akdeniz Municipality
Kahramanmaraş Metropolitan Municipality
Stichting SPARK
İNGEV
Yüreęir Municipality



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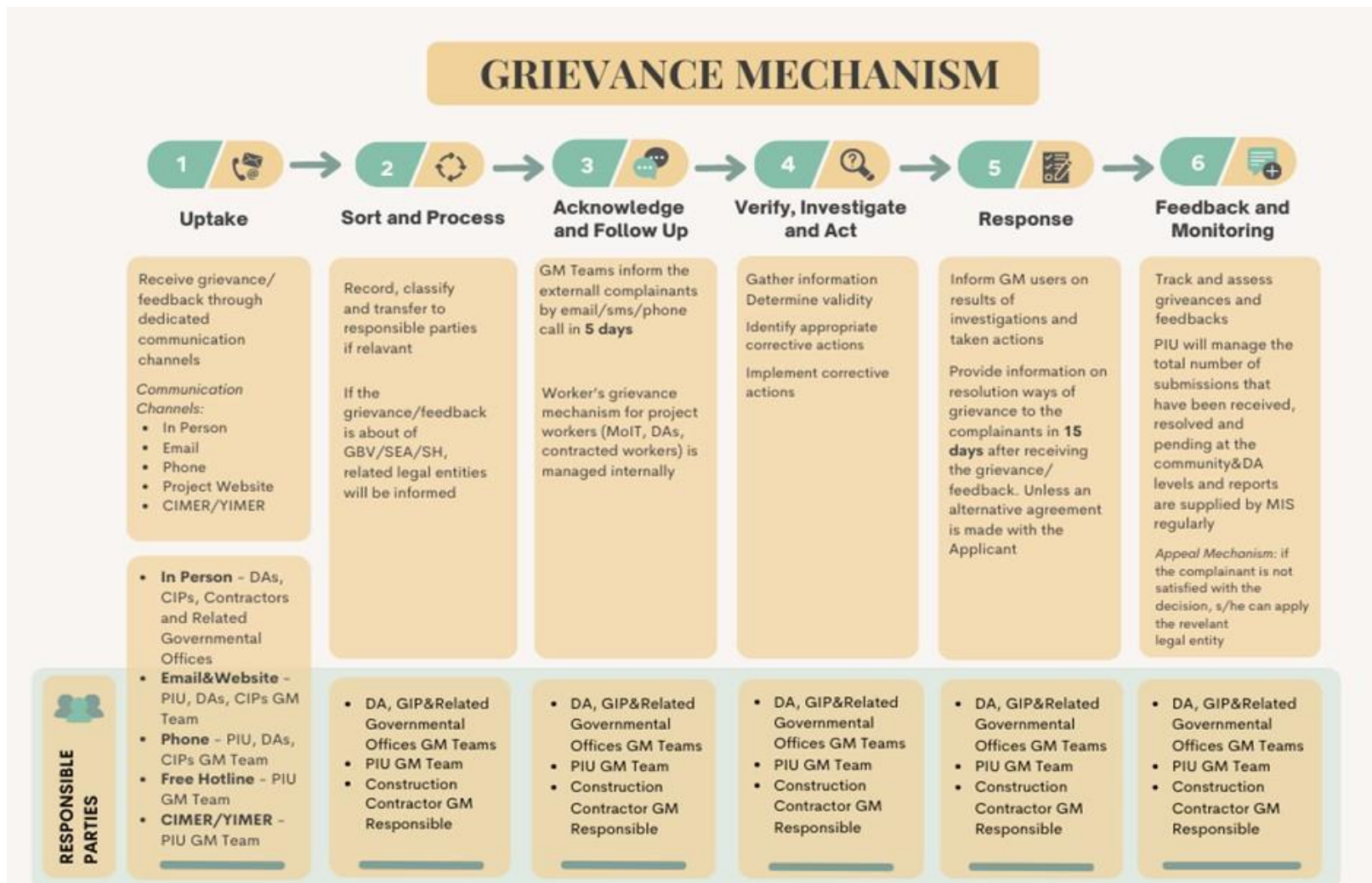


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Annex 4. Operational Flow of GM





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Annex 5 Overview of GM Focal Points

N	Name	Title	Mobile Phone	E-Mail	Agency
1	S. Tuğçe Hazineci Yaman	Expert			MoIT / PIU
2	Evin Emir	Expert			East Mediterranean DA
3	Cihan Ardili	Expert			Silkroad DA
4	Armağan TANRIKULU	Expert			Karacadağ DA
5	Pınar DEMİRBOLAT	Expert			Çukurova DA
6	Melike Sıla Acar	Expert			Tigris DA



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