



## **AGRICULTURAL CREDIT COOPERATIVES OF TURKEY**

Agricultural Employment Support for Refugees and Turkish Citizens Through Enhanced Market Linkages Project

# **STAKEHOLDER ENGAGEMENT PLAN**

FEBRUARY 2020

# STAKEHOLDER ENGAGEMENT PLAN

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## GLOSSARY

**Project:** Refers to Agricultural Employment Support for Refugees And Turkish Citizens Through Enhanced Market Linkages Project

**Stakeholder:** A stakeholder is either an individual, group or organization who is directly or indirectly impacted, positively or negatively, by the outcome of a project. They have an interest in the success of the project, and can be within or outside the organization that is sponsoring the project. Stakeholders can have a positive or negative influence on the project.

**Stakeholder Engagement Plan:** A plan which assists managers with effectively engaging with stakeholders throughout the life of the mine and specifying activities that will be implemented to manage or enhance engagement

**Contract Farming (CF):** Contract farming can be defined as agricultural production carried out according to an agreement between a buyer and farmers, which establishes conditions for the production and marketing of a farm product or products. Typically, the farmer agrees to provide agreed quantities of a specific agricultural product.

**Host communities:** A *host community* in this context refers to the local, social and economic structures within which refugees/SuTPs live<sup>1</sup>.

**Syrians under Temporary Protection (SuTP):** Syrian nationals, as well as stateless persons and refugees from Syria, who came to Turkey due to events in Syria after 28 April 2011 are provided with temporary protection (TP) by the Government of Turkey.

**Grievance Mechanism:** A grievance mechanism is a formal, legal or non-legal (or 'judicial/non-judicial') complaint process that can be used by individuals, workers, communities and/or civil society organisations that are being negatively affected by certain business activities and operat

**Emergency Social Safety Net Programme (ESSN):** ESSN is the Emergency Social Safety Net Programme funded by the European Union (EU) and implemented in partnership by the UN World Food Programme (WFP), the Turkish Red Crescent (TRC), International Federation of Red Cross and Red Crescent Societies (IFRC) and Ministry of Family, Labour and Social Services.

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<sup>1</sup> <https://www.unhcr.org/protection/resettlement/4cd7d1509/unhcr-ngo-toolkit-practical-cooperation-resettlement-community-outreach.html>

## ABBREVIATIONS AND ACRONYMS

ACC	Agricultural Credit Cooperatives of Turkey
CC	Community Center
CF	Contract Farming
DGMM	Directorate General for Migration Management
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
ESSN	Emergency Social Safety Net
FAO	Food and Agricultural Organization of the United Nations
FriT	The EU Facility for Refugees in Turkey
IOM	International Organization for Migration
M&E	Monitoring and Evaluation
MoFLSS	Ministry of Family, Labor and Social Services
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PPM	Public Participatory Meeting
SEP	Stakeholder Engagement Plan
SGK	Social Security Institution
SuTP	Syrians under Temporary Protection
TRC	Turkish Red Crescent <sup>2</sup>
UNDP	United Nations Development Programme
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNWOMEN	The United Nations Entity for Gender Equality and the Empowerment of Women
WB	World Bank

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<sup>2</sup> Negotiations with the Turkish Red Crescent are ongoing. In case of not taking part in the project, who will carry out the activities will be announced later.

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## I. INTRODUCTION

### I.1 Context

1. Following the crisis in Syria, more than 3.6 million Syrian refugees (98.3 percent), Syrians under Temporary Protection, (SuTP) now live among host communities in Turkey. The socioeconomic integration of refugees has become more and more important not least in view of the fact that the Emergency Social Safety Net (ESSN) Programme will not continue after phase 3 is completed, and other supports will not continue endlessly, either. Where-ever the refugees live, they will need to find employment and earn a living.

2. SuTP's socio-economic integration in the agriculture sector is important since Turkey's agricultural economy is among the top ten in the world, with half of the country consisting of agricultural land and nearly a quarter of the population employed in agriculture. Turkey is a major producer of wheat, sugar beets, milk, poultry, cotton, tomatoes and other fruits and vegetables, and is the top producer in the world for apricots and hazelnuts. Turkey import oilseeds, including soybeans and meals, as well as grain products as inputs to animal feed for its meat and rapidly growing poultry sector. Turkey also imports additional cotton as an input for its advanced textile sector, and inputs for its food processing and bakery sector.

3. According to data from the Turkish Statistical Institute at the end of 2017, 18.6% of the labor market in Turkey is employed in the agricultural sector (some 5.3 million people), and over 80% of these are informally employed (96%

informal employment for women).<sup>3</sup> Despite the availability of work permit exemptions in the agricultural sector, many SuTPs struggle to find long-term job opportunities and as result, many are employed as daily workers in agriculture, which is frequently associated with income instability and exploitative working conditions and practices; and for substantially less than the minimum wage.<sup>4</sup> At the same time, the influx of additional labor has led to depressed wages for Turkish agricultural workers, particularly the low-skilled, seasonal and part-time workers.

4. An assessment by the Food and Agriculture Organization (FAO) in 2017 concluded that there is a shortage of skilled and semi-skilled labor particularly in the areas of: livestock care and maintenance, orchard/plantation management and harvesting (citrus and olive), meat processing, greenhouse operation and maintenance (cut flowers and vegetables) and post-harvest processing and packaging.<sup>5</sup>

## **I.II About the Project**

5. This project focuses on improving SuTP's and host communities' agriculture competence, supporting farmers via subsidizing their wages for workers, providing agriculture and soft skills trainings to workers and improving capacity

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<sup>3</sup> Ximena Vanessa Del Carpio and Mathis Christoph Wagner, *The Impact of Syrian Refugees on the Turkish Labour Market*, Policy Research Working Paper no WPS 7402, (Washington D.C.: World Bank), 2015, <<http://documents.worldbank.org/curated/en/505471468194980180/The-impact-of-Syrians-refugees-on-the-Turkish-labor-market>>

<sup>4</sup> Development Workshop, *Fertile Lands & FAO, Turkey: Syrian Refugee Resilience Plan 2018-19*.

<sup>5</sup> FAO, *Turkey: Syrian Refugees and Resilience Plan 2018-19*.

of Agricultural Credit Cooperatives of Turkey (ACCs) with regards to contract farming.

6. The Agriculture Credit Cooperatives (ACC) will be the implementing body of the project. The overall objective of the ACC system is to protect the economic interests and satisfy the financial and professional requirements of the farmer members. The ACC operates through a three-tier structure consisting of the Central Union (CU) of the ACCs, 13 Local Unions (LU) and at present 1.625 Primary Cooperatives (PC) with over 900,000 farmer members.

7. The project is composed of three components: (1) Contract farming employment support and skills development; (2) Micro/Small Investment Support to Increase Employment Impact; and (3) Implementation Support and Institutional Capacity Building

8. **Component 1. Contract farming employment support and skills development.** This component seeks to improve the working conditions of and to create new jobs for Turkish citizens and refugees working in rural areas, where contract farming is available and conducive to increase formal employment, and where the primary ACCs have the capacity to promote, coordinate and supervise contract farming. The project will contribute to expand production of selected crops and boost the demand for labor by supporting employers to increase productivity and expand production of their farms while reducing informality among on-farm and off-farm workers. This will be done through offering eligible employers **an improved and enhanced package of services provided by ACC** including additional technical assistance, administrative/managerial assistance, access to a pool of better skilled workers and financial assistance. The aim is to reduce unregistered agricultural employment and increase sustainable employment through contract farming.

9. **Subcomponent 1.1. Increasing labor demand through enhanced production capacity of farms.** This will be achieved through (i) **On-the-job training (OJT)** for new workers to improve their employability and to increase farm productivity.



Employers can hire trainees for a limited duration, and cost of registration and stipend is covered by project, against an obligation to formally employ a proportion of trainees. (ii) **Wage subsidies**: Temporary wage subsidy to cover workers' registration costs and premiums, as well as a proportion of wages. (iii) **Temporary financing** of the registration costs and premiums for new workers payable to SGK (social security system) under formal contracts. Work permits will be covered for refugees.

**10. Subcomponent 1.2. Improving the skills and employability of agricultural workers.** Support to existing and potential rural workers to improve their employability and labor conditions, and ultimately be hired under formal contracts, through a **comprehensive training program linked to agricultural market needs and tailored to the existing conditions of eligible workers**. The project will ensure that employers participating in contract farming will have access to a pool of skilled (certified) workers, which is expected to boost productivity of farms. The availability of more skilled workers is expected to contribute to higher productivity of farms and consequently better labor conditions.

**11. Component 2. Micro/Small Investment Support to Enhance Employment Impact.** This component will pilot the provision of micro- and small-scale investments (grants) to increase demand for off-farm employment in selected provinces in Turkey. This component aims to enhance the use of and demand for contract farming in project areas by improving the ability of **primary ACC cooperatives** to dry, store, grade, and package the agricultural produce. Such secondary production increases the value addition to the farmers and, as a result, the demand for contract farming schemes. The equipment or goods purchased through the grants will be managed by the primary ACC and will benefit all ACC members, as relevant given their range of agricultural production. This component will be carried-out in the same provinces as Component 1 so that these grants will contribute towards further enhancing

the demand for on-farm employment.

12. **Component 3: Implementation Support and Institutional Capacity Building.** This component will strengthen the capacity of the ACC (Central, Regional and primary ACCs) to effectively implement the proposed project.

13. The initially selected project provinces are Bursa, Izmir, Mersin, Adana, Gaziantep and Adiyaman.

Picture-1: Turkey Map and The Cities Project will be implemented.



### **I.III Purpose of the Stakeholder Engagement Plan**

14. This Stakeholder Engagement Plan (SEP) aims to clarify the stakeholder engagement strategy of ACC throughout the project. The SEP defines the methods and tools that will be used as part of the engagement approach. Both previous engagement activities carried out by ACC and the roles and responsibilities of ACC in engaging with its stakeholders for the implementation of the actions are summarized in this plan. Under the scope of the SEP, assessment of stakeholder interest and support for the project will be conducted. This SEP allows for stakeholders' views to be taken into account in project design and environmental and social performance. The objectives of the SEP are below mentioned:

- To identify all directly or indirectly engaged stakeholders and other interested parties in engaging in the project;
- To draft models for information dissemination among stakeholders and for stakeholders' engagement activities, incl. the frequency and location of such activities during project preparation and implementation;
- To generate a good understanding of the Project among those that will be affected, in particular the agricultural workers among both host communities and refugee population in the sub-project areas;
- To ensure early identification of issues that may pose risks to the Project or its stakeholders;
- To ensure that mitigation measures are appropriate (adequate, implementable, timely, effective and efficient)
- To establish a system for effective and inclusive ways of engagement, ensuring long-term communication between the Project and stakeholders that is of benefit to all parties.
- To define the roles and responsibilities of different actors to implement and monitor these activities;
- To provide detailed information on the plan for a functional grievance redress / beneficiary feedback mechanism and provide project affected parties with accessible and inclusive means to increase issues and grievances and ensure that ACC responds and manages these grievances;
- To ensure timely, understandable, accessible disclosure of technically and culturally relevant project information on environmental and social risks and impacts.

## **II. OVERVIEW OF THE NATIONAL AND INTERNATIONAL LEGISLATION**

15. The national legislation with implication for information disclosure and stakeholder engagement in the project is the following:

### **II.I National Legislation and Regulations**

#### ***Constitution of Republic of Turkey***

16. Constitution of Republic of Turkey is the fundamental document in respect to guaranteeing citizens' freedom of thought and opinion (Art. 25). No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions. Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities (Art. 26). In addition, Citizens and foreigners resident in Turkey, on 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 (Art. 74).

#### ***Law on the Right to Information***

17. Law on the Right to Information No.4982 (Official Gazette dated 24.10.2003 and numbered 25269) defines the process concerning the right to information. It regulates this right in line with the principles of equality, impartiality and transparency, which are the prerequisites of democratic and transparent administration.

"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 Law on Use of the Right to Petition***

ARTICLE 74- (As amended on October 3, 2001; Act No. 4709) 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.( As amended on October 3, 2001; Act No. 4709) The result of the application concerning himself/herself shall be made known to the petitioner in writing without delay. (Repealed on September 12, 2010; Act No. 5982) (Paragraph added on September 12, 2010; Act No. 5982) Everyone has the right to obtain information and appeal to the Ombudsperson. (Paragraph added on September 12, 2010; Act No. 5982) The Institution of the Ombudsperson established under the Grand National Assembly of Turkey examines complaints on the functioning of the administration. (Paragraph added on September 12, 2010; Act No. 5982)

### ***Regulation on Environmental Impact Assessment***

18. Regulation on Environmental Impact (Official Gazette dated 25.11.2014 and numbered 29186), prepared in the context of Art 10 of the Environmental Law (1983), requires a project to conduct a public information meeting. According to this Regulation, the primary objective of the public information meeting is to inform and consult the public on the project. The regulation requires the meeting to be conducted in the project site, accessible for the interested people; and the date and venue of the meeting need to be approved previously by the Governor and announced in a local and a national newspaper, at least 10 days prior to the meeting. Similar announcements will also be posted to the neighbouring quarters and counties, by the staff of the Governor.

The comments and suggestions expressed in the meeting should be recorded by the representatives of the Ministry of Environment and Urbanization. These written opinions and suggestions should be revised throughout the project life.

## II.II INTERNATIONAL LEGISLATION

### ***World Bank Environmental and Social Standard on Stakeholder Engagement***

19. 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).

20. This standard requires that an SEP that is proportionate to the nature and scale of the project and its potential risks and impacts is developed by the Borrower, that it is disclosed as early as possible before project appraisal, and that the Borrower seeks the views of stakeholders on the SEP, including on the identification of stakeholders and proposals for future engagement. An updated

SEP needs to be disclosed by the Borrower subsequent to any significant changes to the original version (World Bank, 2017: 99). In addition, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

### III. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

21. Meetings with stakeholders and potential stakeholders were carried out as the part of the project preparation phase. The purpose of the meetings was to obtain positive and negative feedback on the project, learning about unanticipated potential challenges in the field and discuss possible partnerships. The meetings were organized with following institutions:

Vice Presidency FRIT Office	Social Security Institution	General Directorate of International Labor Force	Ministry of Agriculture and Forestry
Farmers	Turkish Agriculture Workers	Syrians and other Refugees already working and seeking job	Primary ACCs' Staff
FAO	Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR)	Some Local NGOs	Turkish Red Crescent Community Centers

**TABLE-1: Institution and Participant List**

INSTITUTIONS	DATE	PLACE	PARTICIPANTS
Vice Presidency FRIT Office	01/10/2019 23/10/2019	ACC Central Union	Halil Afşarata Mehmet Okan Ateş Oğuzhan Gürbüz
Social Security Institution	08/10/2019 12/11/2019	SGK Anti-Informal Employment Department	Emre Mutlu Mehmet Kerem Bozkurt Erkan Işık Efşan Naz Özen



General Directorate of International Labor Force	18/10/2019	International Labor Force Building	Saadettin Akyıl Mehmet Okan Ateş Mustafa Alver Efşan Naz Özen Aydın Erdoğan
Farmers	22/08/2019 23/08/2019 11/09/2019 12/09/2019 17/09/2019	Adıyaman Kahramanmaraş İzmir Manisa Adana	İlyas Kılıç Mehmet Erol Volkan Güngör Mustafa Alver Gözde Yılmaztürk Efşan Nas Özen Bora Sürmeli Ayşe Ariak Sarah Coll-Black Manuel Salazar Laurent Loic Yves
Agriculture Workers	22/08/2019 23/08/2019 11/09/2019 12/09/2019 17/09/2019	Adıyaman Kahramanmaraş İzmir Manisa Adana	İlyas Kılıç Mehmet Erol Burçak Akansel Volkan Güngör Mustafa Alver Gözde Yılmaztürk Efşan Nas Özen Bora Sürmeli Ayşe Ariak Sarah Coll-Black Manuel Salazar Laurent Loic Yves
Ministry of Agriculture and Forestry	11/10/2019	Ministry of Agriculture and Forestry Building	Ayhan Baran Ömer Faruk
Primary ACCs	22/08/2019 23/08/2019 11/09/2019 12/09/2019 17/09/2019	Adıyaman Kahramanmaraş İzmir Manisa Adana	İlyas Kılıç Mehmet Erol Volkan Güngör Mustafa Alver Gözde Yılmaztürk Efşan Nas Özen Bora Sürmeli Ayşe Ariak Sarah Coll-Black Manuel Salazar Laurent Loic Yves
FAO	04/09/2019		Ayşegül Selışık Nuri Dilekçi

		UN Central Asia Sub-Regional Office	Ege Aktürk Hilal Aydos
DG NEAR	16/05/2019	-	Mehmet Okan Ateş Maciej Popowski Christian Danielsson
TRC	07/10/2019 11/10/2019 15/11/2019 20/12/2019	TRC Community Based Migration Programme Coordinatorship ACC Central Union	Alper Küçük Kamil Erdem Güler Cihan Arsu Merthan Gözener Ece Ceren Doğar

22. The topics of the meetings were primarily centered on the formalization of the employment of agricultural workers, reaching the intended workers (Host Community, SuTP, and other Refugees), learning from existing, similar projects and assessing the current situation of social cohesion between Turkish and refugee workers. According to the meetings, observations are listed as follows:

- Although statistics indicate that refugees don't work, most of the refugees are working informally in the agriculture sector. Many job opportunities exist for refugees, because they are willing to work for very low wages.
- SuTPs might be reluctant to engage in formal work, since formal employment means losing ESSN Programme rights.
- Farmers express willingness to join the project with its focus on contract farming. Some of them stated that sometimes there may be social tensions between Turkish and Syrian refugees in the field, caused by mainly cultural differences and increased competition in job market especially in informal economy,
- Many socio-economic support projects exist, but there are no coordination between them.
- In the studies carried out by the General Directorate of International Labor Force, it has been determined that most of the immigrants earn their living from the daily incentives they receive by participating in trainings. It is stated that there are a lot of refugees who have participated in more than 20 trainings, in

order to obtain the associated daily incentives. It is stated that the employment of immigrants who have become financially dependent, is of great importance.

- Farmers stated that they would be willing to employ more qualified Turkish and migrant workers for higher wages.

- A concern was expressed by representatives from the SGK (the State social security system) that additional costs arising from workers being insured could discourage farmers from employing them. Therefore, this should be taken into account when planning farmer incentives.

Brief of Meetings (From to Application Date Until Now) indicate dates to extent possible and number of participants.

**Table 2: Key Points of Discussions**

Location	Participants	Key Points of Discussion
Ankara	Primary ACCs' Staff	Possible challenges expected from Farmers and workers (Formalization of employment, additional expenses, losing rights of Green Card and ESN, etc.) Farmer and Crop Selection
Bursa, İzmir Kütahya, Afyonkarahisar, Mersin, Adana, Kahramanmaraş, Gaziantep and Adıyaman	Primary ACC's Staff, Farmers, Turkish Workers, Refugee Workers	Possible challenges perceived by Farmers and workers (Formalization of employment, additional expenses, losing rights of Green Card and ESN, etc.) Farmer and Crop Selection
İzmir, Kahramanmaraş, Kayseri, Konya, Mersin, Şanlıurfa,	Primay ACC's Staff	Possible challenges expected from Farmers and workers (Cultural differences, perception of farmers and workers)

Antalya, Balıkesir, Kilis, Aydın, Denizli, Manisa, Nevşehir, Karaman, Afyonkarahisar, Eskişehir, Kütahya, Osmaniye, Samsun		Farmer and Crop Selection
Ankara	Vice Presidency FRIT Office	Expectations from project Timeline of the Project
Ankara	Social Security Institution	Formalization issues Insurance Payments
Ankara	General Directorate of International Labor Force	Formalization issues Worker data supply
Ankara	FAO	Employment in CF
Ankara	Ministry of Agriculture and Forestry	Employment in Agricultural sector
Brussels	Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR)	<ul style="list-style-type: none"> <li>• Expectations from project</li> </ul>
Ankara	Turkish Red Crescent	Possible challenges in ongoing programme and implications on planned programme

## IV. STAKEHOLDER IDENTIFICATION AND ANALYSIS

23. Identification of stakeholders is essential tool of SEP. Stakeholders are individuals or groups positively or negatively affected by the project. For the scope of the SEP:

**i. Direct Stakeholders** refers to individuals and groups directly affected by the project, e.g. through positive or negative impacts on their livelihood, assets whether temporarily or permanently, including physical environment including land, houses, other structures, businesses, crops, health, security, culture, socioeconomic situation.

The direct stakeholders of the different components are:

**Component 1.1:** Primary ACCs, and Farmer members (registered as formal employers in SGK, and informal employers expected to register formally with SGK) of the primary ACCs who receive (i) free On-the-Job Training to laborers, (ii) wage subsidy to laborers, and (iii) Temporary financing of the registration costs and premiums for new workers payable to SGK. Laborers (Turkish and SuTP) being hired under the above schemes. Workers benefiting from wage subsidies (Host Community Members (Turkish People), Syrians under temporary protection, refugees)

**Component 1.2:** New agricultural workers, SuTP and host community being trained. Consultancy services providing training to above group of eligible workers

**Component 2:** Primary ACCs receiving Micro/Small Investment Support grants; members in select provinces. Farmer members of these ACCs benefitting from services offered in secondary production. Any additional labor being recruited as a result of these investments.

**Component 3:** Central, Regional and primary ACCs receiving capacity building

**ii. Indirect Stakeholders** refers to other persons and groups that due to the project locations, local and central governmental authorities, private sector, techno parks, universities, NGOs, INGOs, unions, women’s organizations, cultural groups may be positively or negatively affected by the scope of the project. MoFLSS DG International Labor Force, İŞKUR, MoFLSS DG Social Assistance and Social Security Institution are indirect stakeholders of project.

**iii. Vulnerable groups.** Stakeholder analysis also identifies whether project impacts 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. In the present context this includes youth, women and refugees in general, who have particular high unemployment, and if employed, are mainly in informal sector with low wages and risk of exploitative work conditions – plus limited awareness of rights due to language issues.

24. Project stakeholders (direct and indirect) and level of interest and influence are defined in the table below.

**Table 3 : Level of Interest and Influence of Stakeholders**

Stakeholder	Description	Issues/Interaction	Significance Level – Interest in programme	Significance Level – Influence on programme
Refugees and SuTP jobseekers who want to work in	Affected group directly affected by project activities.	Potential beneficiaries will be selected from workable ESSN beneficiary list, other refugees applying to	High	Low

agriculture sector in selected provinces	<p>SuTPs who are beneficiary of ESN program and want to work formally are eligible.</p> <p>Other refugees want to work formally are eligible</p>	<p>Primary ACC's and TRC CC's registration desk.</p> <p>Social Assistance Directorate of the MoFLSS and DG International Labor Force of the MoFLSS will share potential beneficiary lists with ACC. After profiling beneficiaries, job opportunities will be offered. The expected target is 30.000 beneficiaries.</p>		
Women Refugees and SuTPs who want to work in agriculture sector in selected provinces	<p>Priority will be given to women refugees and SuTPs in profiling system to work in agriculture sector.</p>	<p>Women refugees and SuTPs are reluctant to work outside their homes especially in agriculture sector. Except family members and neighbours, they have little communication with other actors.</p>	High	Low
Turkish agriculture workers	<p>Turkish agriculture workers residing in selected provinces.</p>	<p>Turkish agriculture workers residing in selected provinces willing to work formally in agriculture sector will be eligible</p>	High	Low
Farmers	<p>Turkish farmers signing contract</p>	<p>Turkish farmers residing in selected provinces</p>	High	Medium

	with ACC in the scope of CF for suitable crops will be eligible			
Vulnerable groups in refugees and host community	<ul style="list-style-type: none"> <li>-Refugees and Turkish citizens who have right to take social assistance</li> <li>-Women and youth</li> <li>-Female headed households</li> <li>-Households with disabled members</li> </ul>	Potential beneficiaries will be selected from workable ESSN beneficiary list, other refugees apply to Primary ACC's and TRC CC's registration desk. Beneficiaries will be screened for their needs and employability status	High	Low
ACC	Responsible authority of the program for all actions	ACC will receive capacity support for coordination, decision-making, information systems for data management, training, investments and other project activities	High	High
Primary ACCs	Primary ACCs in selected provinces	Primary ACCs will be supported to implement activities of contract farming in scope of the project and collecting data of workers.	High	High
TRC Community Centers	TRC Community Centers in	TRC Community Centers will be supported in their	Medium	Low



(wherever they exist in the Project areas)	selected province	outreach work and data collection.		
Steering Committee	Presidency Office, ACC, MoAF, MoFLSS, Turkish Red Crescent, World Bank and EU Delegation	Steering Committee for the Project	High	High

25. Other Interested Parties (OIPs) of the project are described in the Table below according to their level of interest and influence. Other Interested Parties comprise groups and peoples who may be interested in the project because of its location, its proximity to natural or other resources, or because of the sector or parties involved in the project. These may be local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities. While these groups may not be directly affected by the project, they may have a role in the project preparation (for example, government permitting) or be in a community affected by the project and have a broader concern than their individual household.

**Table 4: Level of Interest and Influence of OIPs**

Stakeholder	Description	Key Role	Significance Level - Interest	Significance Level - Influence
Host community	Host community in selected provinces	Host community may benefit from increased economic activities and employment in	Low	Low

		agricultural sector. The joint targeting of SuTP and host population, plus the main project beneficiaries being farmers, will mitigate any feeling of disproportionate assistance to SuTP.		
MoAF	MoAF in Ministry Level	Consultancy about the project	Medium	Medium
Provincial Directorates of MoAF	Provincial Directorates of MoAF in selected provinces	Consultancy about the project's training activities	Medium	Low
MoFLSS	DG International Labor Force	Informing about labor rights and regulations relating to foreign workers	Medium	Medium
Municipalities	Municipalities in selected provinces	Informing about project Steering refugees who is already connected to our registry desks	Medium	Low
Directorate General for Migration Management	DGMM HQ in Ankara	Informing about the project's alignment with Turkey's harmonization strategy and the ESSN exit strategy	Medium	Medium
Partners in the field in the scope of	Partners in the field in the scope of FRiT and other	The project will coordinate with development partners	Medium	Low

FRiT and other refugee based funds in socio-economic sector	refugee based funds in socio-economic sector such as UN Women, FAO, ILO, IOM, UNDP, UNFPA, UNICEF, KfW, GiZ, provide various services and implement projects targeting refugees.	through existing coordination mechanisms.		
Local NGOs and INGOs	Local and international NGOs in selected provinces which have refugee based and women based activities in socio-economic sector	Steering refugees to the registration desks and expecting participation to the workshops and seminar in local	Low	Low

26. There are other interested parties who will be future stakeholders that are considered under the category *Future Other-Interested Parties* (Future OIP). These stakeholders are FRiT financed projects that are under preparation.

**Table 5: Future OIPs**

Other interested parties	Interest in the Project
Business and workers' organizations	Interest in procurement and supply chain, potential environmental and social as well as community health and safety
Academic institutions (e.g. universities, think tanks, schools)	Potential concerns over regarding environmental and social impacts

Local media	News stories relating to the local impact of the Project
FRIT Project Partners (Development Agencies, KOSGEB, Development Bank of Turkey, İŞKUR, etc.)	Sharing of data and experiences

## V. STAKEHOLDER ENGAGEMENT PLAN

### V.I Stakeholder Engagement Methods in the Project

27. The Central ACC is the coordination and implementation institution in the project. Primary ACCs has a key role in the project via contracting with farmers and collecting worker data. TRC CCs has a role for outreach and collecting worker data.

The outreach strategy of the project, including the SEP, will include an information campaign targeted to refugee communities and Turkish citizens residing in the provinces selected by the project, involving not only media but actual mobilization of teams to reach out to communities where this population resides.

28. Methods will be used for the implementation of the SEP are following:

#### **(a) Consultation Meetings and Informative Seminars centrally and locally**

Consultation meetings will be organized with stakeholders including related ministries and DG's, provincial directorates of other line ministries, municipal authorities, universities, etc. More than that, consultation meetings will be held with stakeholders who are directly affected by the project on a regular basis at each stage of the project district by district. It will be conducted in Turkish or Arabic depending on the stakeholders engaged. In addition to face-to-face meetings, for the refugee intense small districts, special meetings and seminars will be conducted in communication with local authorities such as district governor, mukhtar, etc.

**(b)Registration Desks**

Primary ACCs and TRC CCs will provide information to SuTPs, refugees and host communities about project activities. Brochures, handbooks, etc. will be ready for the potential beneficiaries in Arabic and English.

**(c)Communication Materials**

Variety of materials including posters, brochures, leaflets, hand-outs, project journals, local TV commercials, radio spots, local newspaper advertisements (in Turkish and Arabic), etc. will be provided for the public. Communication strategy document will be prepared.

**(d)Social Media**

Social Media Accounts will be set up by ACC PIU for Facebook, Instagram, Twitter, LinkedIn etc. These social media accounts will be managed by a team of social media experts and regularly updated. These accounts ensure opening communication channels with stakeholders.

**(e)Website**

Website for project will be set up to publish all events, calls, documents in Turkish, English, and Arabic. It will be managed by communication consultant with the communication with related Central ACC departments.

**(f) Grievance Mechanism**

The project website will also provide information about available grievance redress mechanism (GRM), and access to one of several options for registering a grievance. See further details of the GRM below.

## V.II Overview Of The SEP

Table 6 : Overview of the SEP

Subgroup	Project Phase	Engagement Mechanism	Communication Channels & Materials	Purpose	Venue	Frequency	Responsible Party
<b>PAP</b>							
Refugees and SuTP jobseekers who want to work in agriculture sector in selected provinces	Preparation, implementation, completion	Consultatory Meetings, Informative Seminars, focus group discussions, implementation support and M&E visits,	Registration Desks, social media, posters, brochures, leaflets, hand-outs, project journals, local TV commercials, local newspaper advertisements (Turkish, Arabic)	Ensuring to reach right beneficiary to increase the effectiveness of the project; Reaching every potential beneficiary who is likely to work in agriculture sector; Preventing potential risks	Primary ACCs, TRC CCs	<i>Daily</i> ; Individual interactions Weekly/ Monthly; Other engagements	ACC PIU
Women Refugees and SuTPs who want to work in agriculture sector in selected provinces	Preparation, implementation, completion	Consultatory Meetings, Informative Seminars, focus group discussions, implementation support and M&E visits,	Registration Desks, social media, posters, brochures, leaflets, hand-outs, project journals, local TV commercials, local newspaper advertisements (Turkish, Arabic)	Ensuring to reach right beneficiary to increase the effectiveness of the project; Reaching every potential beneficiary who is likely to work in agriculture sector; Preventing potential risks (There will be priority for women refugees and SuTPs)	Primary ACC, TRC CCs	<i>Daily</i> ; Individual interactions Weekly/ Monthly; Other engagements	ACC PIU
Turkish agriculture workers	Preparation, implementation, completion	Consultatory Meetings, Informative Seminars, focus group discussions, implementation support and M&E visits,	Registration Desks, social media, posters, brochures, leaflets, hand-outs, project journals, local TV commercials, local newspaper advertisements (Turkish)	Ensuring to reach right beneficiary to increase the effectiveness of the project; Reaching every potential beneficiary who is likely to work in agriculture sector; Preventing potential risks (There will be priority for women refugees and SuTPs)	Primary ACC	<i>Daily</i> ; Individual interactions Weekly/ Monthly; Other engagements	ACC PIU

Subgroup	Project Phase	Engagement Mechanism	Communication Channels & Materials	Purpose	Venue	Frequency	Responsible Party
Farmers	Preparation, implementation, completion	Consultatory Meetings, Informative Seminars, focus group discussions,	Registration Desks, social media, posters, brochures, leaflets, hand-outs, project journals, local TV commercials, local newspaper advertisements (Turkish)	Ensuring to reach right beneficiary to increase the effectiveness of the project;	Primary ACC	Daily; Individual interactions Weekly/ Monthly; Other engagements	ACC PIU
Host community	Preparation, implementation, completion	Consultatory Meetings, Informative Seminars, focus group discussions, implementation support and M&E visits,	Registration Desks, social media, posters, brochures, leaflets, hand-outs, project journals, local TV commercials, local newspaper advertisements (Turkish)	Ensuring to reach right beneficiary to increase the effectiveness of the project; Reaching every potential beneficiary who is likely to work in agriculture sector; Preventing potential risks (There will be priority for women refugees and SuTPs)	Primary ACC	Monthly	ACC PIU
<b>OIP</b>							
MoFLSS DG International Labor Force	Preparation, implementation, completion	Coordination Meetings	Telephone, e-mails, monthly reports, quarterly reports, posters, brochures, leaflets, hand-outs,	Keeping them informed of the project's alignment with Turkey's harmonization strategy and the ESSN exit strategy	MoFLSS DG International Labor Force HQ in Ankara	Monthly	ACC PIU
DGMM	Preparation, implementation, completion	Coordination Meetings	Telephone, e-mails, monthly reports, quarterly reports, posters, brochures, leaflets, hand-outs,	Keeping them informed of the project's alignment with Turkey's harmonization strategy and the ESSN exit strategy	DGMM HQ in Ankara	Monthly	ACC PIU
MoAF	Preparation, implementation, completion	Coordination Meetings	Telephone, e-mails, monthly reports, quarterly reports, posters,	Providing regular updates on project implementation and progress	MoAF HQ	As needed	ACC PIU



Subgroup	Project Phase	Engagement Mechanism	Communication Channels & Materials	Purpose	Venue	Frequency	Responsible Party
			brochures, leaflets, hand-outs,				
Partners in the field in the scope of FRIT and other refugee based funds in socio-economic sector	Preparation, implementation, completion	Coordination Meetings	Telephone, e-mails, monthly reports, quarterly reports, posters, brochures, leaflets, hand-outs,	Providing regular updates on project implementation and progress for referral	To be determined	As needed	ACC PIU
Local NGOs and INGOs	Preparation, implementation, completion	Coordination meetings	Telephone, e-mails, monthly reports, quarterly reports, posters, brochures, leaflets, hand-outs,	Providing regular updates on project implementation and progress for referral	To be determined	As needed	ACC PIU

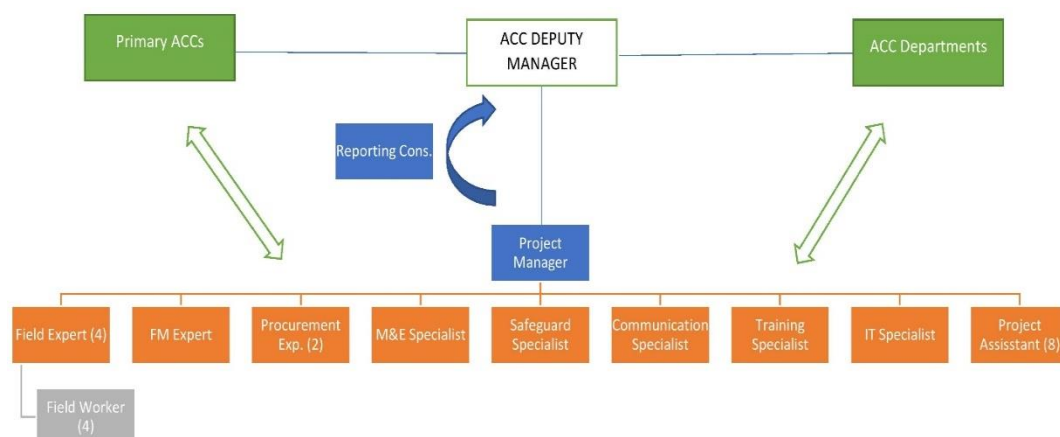
## **VI. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT**

### **VI.I Implementation Arrangements**

ACC will mobilize human and material resources to implement the SEP and the Grievance Redress Mechanism (GRM), both of which will be led by ACC PIU. Outreach activities will be carried-out mostly by ACC and NGO or Primary ACCs, selected to carry out outreach to refugees, complemented by outsourced private organizations and NGOs, as necessary, contracted by ACC. ACC will hire additional staff responsible for environmental and social safeguards. These experts will be embedded within the responsible departments of the ACC. The team will be supported by part-time and full-time consultants, as needed.

. Environmental and Social expert will be responsible for the environmental and social screening and performance of the Project. Specific named personnel will be appointed for these roles as the project progresses. The material resources that ACC will mobilize are – (i) a Project specific section on the ACC website; (ii) an electronic grievance database; (iii) a stakeholder engagement register; (iv) printed documents (manuals, brochures, posters, etc.) that will be used, based on the requirements of the SEP.

## VI.II Roles and Responsibilities



ACC PIU will be responsible for the implementation of stakeholder engagement activities and of the SEP implementation. The Unit will have designated staff responsible for SEP and GRM. However, to implement the various activities envisaged in the SEP, the PIU Team will need to closely coordinate with other key stakeholders – other ACC branches, national and local government departments/agencies, NGOs, ISKUR, host communities, refugees and farmers. The roles and responsibilities of these actors/stakeholders are summarized in the Table below. (Organisational chart will be revised upcoming days after discussions with World Bank)

**Table 7: Responsibilities of Key Actors/Stakeholders in SEP Implementation**

Actor/Stakeholders	Responsibilities
ACC (Project Implementation Unit) – designated SEP/GRM staff	Planning and implementation of the SEP; Leading stakeholder engagement activities; Management and resolution of grievances; Consultation on specific SEP activities; Announce the important construction activities (such as road closures and service interruptions)
Primary ACCs and TRC CCs	Inform ACC on any issues related to engagement with stakeholders;

<b>Actor/Stakeholders</b>	<b>Responsibilities</b>
	Transmit and resolve complaints caused in the field.
National Government Departments (MoFLSS, DGMM, MoAF)	Participate in the implementation of some activities in the SEP; Make available and engage with the public on the Project Reports.
Directly affected people (job-seekers among SuTPs, Turkish workers, vulnerable groups incl. women)	Invited to engage and ask questions about the Project at Project Meetings and through discussions with PIU where it is of interest or of relevance to them; Lodge their grievances using the Grievance Resolution Mechanism defined in the SEP (Section 6.0 Grievance Mechanism); Help the Project to define mitigation measures;
Farmers engaged in project via ACC	Invited to engage and ask questions about the Project at Project Meetings and through discussions with PIU where it is of interest or of relevance to them; Lodge their grievances using the Grievance Resolution Mechanism defined in the SEP (Section 6.0 Grievance Mechanism); Help the Project to define mitigation measures;

### **VI.III Stakeholder Engagement Budget**

30. To implement stakeholder engagement plan, approximately 1.2 Million € budget is allocated to carry out opening and closing events, yearly informative meetings, sectoral committee meetings, local informative meetings for host community members and refugees, micro-level meetings, social media management, web services and other related similar activities.

### **VI.IV Information Disclosure**

31. This SEP was disclosed on 19.02.2020, ACC' website, in Turkish, English, and print versions will be available at primary ACCs and TRC CCs to facilitate stakeholders' access. Summary brochure of SEP in Arabic will be also shared. The SEP will be

subject to public consultation among stakeholders along with other safeguards documents. This will enable stakeholders to comment on the SEP, including on the identification of stakeholders and proposals for future engagement. A summary of this public consultation will be included in project website. Project will continue to disclose project information over the life of the project.

**ACC Contact Information:**

The point of contact regarding grievance management and the local stakeholder engagement activities is the ACC Central Union:

**Table 8: Contact Details of ACC**

Description	Contact Details
<b>Company:</b>	The Agricultural Credit Cooperatives of Turkey
<b>To:</b>	Central Union
<b>Address:</b>	Yukarı Bahçelievler Mahallesi Wilhelm Thomsen Caddesi No:7 Çankaya Ankara
<b>Email:</b>	frit@tarimkredi.org.tr
<b>Telephone:</b>	+90(312) 216 40 00 / 444 4 855
<b>Website</b>	<a href="http://www.tarimkredi.org.tr/">http://www.tarimkredi.org.tr/</a>

32. Information on the Project and future stakeholder engagement programs will available on the Project’s website and will be posted on information boards in the Project area. Information can also be obtained from the ACC Environmental and Social staff. For information on engagement with national and international stakeholders, and for information on the environmental and social performance of the Project, NGOs, CSOs and media are invited to contact ACC Central Union PIU in Ankara:

**Table 9: Contact Details of ACC PIU**

Description	Contact Details
<b>Company:</b>	The Agricultural Credit Cooperatives of Turkey
<b>To:</b>	Central Union PIU
<b>Address:</b>	Yukarı Bahçelievler Mahallesi Wilhelm Thomsen Caddesi No:7 Çankaya Ankara

Email:	<a href="mailto:frit@tarimkredi.org.tr">frit@tarimkredi.org.tr</a>
Telephone:	+90(312) 216 40 00 / 444 4 855
Website	<a href="http://www.tarimkredi.org.tr/">http://www.tarimkredi.org.tr/</a>

## VI.V Monitoring and Reporting of the SEP

33. Monitoring reports documenting the environmental and social performance of the Project will be prepared by the ACC PIU and shared with the World Bank. The monitoring reports are prepared on a quarterly base. These reports will include a section regarding stakeholder engagement and grievance management. The following proposes a comprehensive set of indicators related to SEP performance to be documented in environmental and social performance monitoring reports at this stage.

### Indicators for Engagement with Stakeholders

- Number and location of formal and informal meetings with Direct & Indirect Stakeholders and Interested Groups
- Number and location of formal and informal meetings with Disadvantaged/Vulnerable groups – specify which group (women, elderly, disabled, refugees), number of men and women that attended each of the meetings above
- Number of local and refugees attending each of the meetings above  
For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Projects environmental and social management system.

Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the environmental and social quarterly reports as evidences.

### Indicators for Grievance Resolution Mechanism

- Number of grievances received, in total and at the local level,

- Number of grievances received from stakeholders, and sorted and analyzed according to category of grievance
- Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance,

During the Project implementation, the ACC PIU will prepare semi-annual reports, which will include an update on implementation of the stakeholder engagement plan and include indicators in this section. The quarterly reports will be shared with the World Bank.

### Reporting Back To Stakeholder Groups

ACC's PIU, will report back to stakeholder groups, primarily through public meetings organized in cooperation with primary ACCs and TRC CCs. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GRM will be responded to in writing and verbally – in Turkish and Arabic language. Key Project updates will be posted on ACC's website.

## VII. GRIEVANCE MECHANISM OVERVIEW AND STRUCTURE

34. ACC has an existing grievance mechanism for its employees, partners and customers about the products and services provided and all grievances are submitted via ACC hotline (#444 48 55). Within the scope of the project, the existing Grievance Redress Mechanism (GRM) of Agricultural Credit Cooperatives Call Center will be adapted in line with the specific needs of the project to collect and evaluate grievances and demands by the farmers, workers and all related stakeholders

35. The GRM will be accessible to a broad range of Project stakeholders who are likely to be affected directly or indirectly by the project. These will include beneficiaries-farmers and primary ACCs-, community members, project implementers/contractors/service providers etc.—all of who will be encouraged to refer their grievances and feedback to the GRM.

36. The GRM can be used to submit complaints, feedback, queries, suggestions or compliments related to the overall management and implementation of the project, as well as issues pertaining to sub projects that are being financed and supported by the project, including:

- Mismanagement, misuse of Project Funds or corrupt practices.
- Violation of Project policies, guidelines, or procedures, including those related to child labor, health and safety of community/contract workers and gender violence.
- Disputes relating to resource use restrictions that may arise between or among affected communities.
- Grievances that may arise from members of communities who are dissatisfied with the eligibility criteria, project activities, or actual implementation of the project
- General feedback, questions, suggestions, compliments.



37. The ACC project GRM will establish clearly defined timelines for acknowledgment, update and final feedback to the complainant. To enhance accountability, these timelines will be disseminated widely to Project stakeholders. The timeframe for acknowledging the receipt of the grievance is 15 days. Addressing and responding to feedback is 30 days from the time that it was originally received, and this period is subject to extension upon the written consent of the ACC PIU head.

38. The structure of the Feedback system/GRM for the project will be comprised of three levels, from the level of the primary ACC through the central PIU level.

1-Primary ACC Level. To ensure that the GRM is accessible to farmers and workers at the community level, they will have the option to report their complaint/feedback to designated *grievance focal points* (GFPs) who are staff in the primary ACC.

2-Central ACC/PIU Level. If there is a situation in which there is no response from the primary ACC level grievance redress focal points, or if the response is not satisfactory then complainants and feedback providers have the option to contact the PIU directly to follow up on the issue. The PIU's grievance redress focal point will be responsible for complaints and issues related to all districts and components. The PIU Director will make a final decision after a thorough review of the investigation and verification findings.

3-Appeal Mechanism. If the complaint is still not resolved, the complainant may escalate/appeal to a higher level of GRM within the project at the central level. If s/he is not satisfied with the decision, then s/he can submit his/her complaint to the appropriate court of law.

39. In addition to the project level GRM, workers' grievance mechanism will be established to enable project workers to raise workplace concerns. Every complaint that under the responsibility of other governmental institutions will be forwarded to the relevant institutions. All mechanism will serve in Turkish and Arabic. The content and procedures of the new grievance mechanism is given below in detail.

## **1. Workers Grievance Mechanism**

40. Within the scope of the project, the existing Agricultural Credit Call Center will be adapted in line with the specific needs of the project to collect and evaluate grievances and demands by the farmers and workers to be employed within the Project (direct, contracted, and community workers). In order to prevent language barriers, the mechanism will be established in Turkish, English and Arabic languages. A grievance mechanism will be set up for direct, contracted, and community workers to formally raise their concerns, complaints and grievances and facilitate resolutions in a confidential manner, if needed.

The workers grievance mechanism will include:

- A procedure to receive grievances such as a Call Center, comment/complaint form, suggestion boxes, email, website; ACC regional and local offices;
- Stipulated timeframes to respond to grievances;
- A register to record and track the timely resolution of grievances;
- A responsible department to receive, record and track resolution of grievances;
- Grievance categories (working conditions, financial, child/forced labor, legal issues (harassment/robbery, etc) and other issues) to categorize grievances, complaints and concerns to handle them efficiently.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.

- Management will treat grievances seriously and take timely and appropriate action in response.
- Information about the existence of the grievance mechanism will be readily available to all project workers (direct, contracted, and community) through notice boards, the presence of “suggestion/complaint boxes”, call center, announcements during training, seminars, meetings, access link on main page of project website, project printed materials that will be distributed to community workers, social media and other means as needed.
- The Project workers’ grievance mechanism will not prevent workers to use other judicial or administrative remedies available under the law.
- The workers grievance mechanism will be established by Project effectiveness.

## **2. Assessment Procedure**

### a. Purpose

The process of evaluating the grievances of individuals will be 15 work days. The assessment of grievances will be systematic, transparent, accessible and objective.

### b. Scope

Grievances received via ACC Call Center (444 48 55) will be directed to PIU Team and any other grievances received via e-mail, website, comment/complaint form, suggestion boxes, regional and local offices will be processed by PIU Team. All these grievances are in the scope of grievance redress mechanism.

### c. Definitions

Worker: Person employed or engaged under the Project.

Grievance: Any kind of dissatisfaction expressed verbally or written by workers during the implementation of the Project.

Feedback: Opinions, comments and relevant statements regarding the process of handling and redressing the grievances.

### d. Responsibilities

Project Director, Project Manager, Communication Specialist and Project Specialists.

#### e. Procedure Flow

##### Receiving Grievances (Accessibility / Response):

Grievances are sent through the channels listed below or through face-to-face interviews with ACC Units' staff.

- Customer Relations at 444 48 55
- Complaints forms, social media platforms available at ACC websites
- E-mails to info\_frit@tarimkredi.org.tr
- Complaint forms in the Contract Farming Module

The grievances received via any channel will be entered to the Project IT System and evaluated from a single point. The Communication Specialist in PIU Team is the first one who will consider the grievance and will refer the grievance to the responsible person (finance specialist, field specialist, etc.) and/or unit (any unit in ACC, legal organization, etc.) according to the type of the grievance. Moreover, if further information is required about the grievance, communication specialist or any other staff referred by communication specialist asks to the owner of grievance. After all the information is gathered, the responsible staff will put great effort to redress the grievance and will resolve it within 15 workdays. The final result of the procedure will also be recorded to the IT System for further evaluations.

### **3. Other Issues**

#### a. Contacting People

After the grievance is received by the PIU, worker will be contacted to get additional information and investigation shall be initiated by the Communication Specialist. Grievances received outside of the working hours are evaluated within the first working day. The redress of grievance is targeted to be achieved within 15 workdays.

#### b. Detailed Investigation, Redress of the Grievance and Informing the Persons:

ACC-PIU aims to redress the grievances in the shortest period of time. The grievances of each person shall be evaluated with a fair and objective and approach.

In all circumstances, the grievances are followed until all appropriate remedies are tried. The person will be provided with information about the resolution and asked

for feedback. According to the results, the grievance case will be closed as “solved-not satisfied” or “solved-satisfied” If the source of grievance cannot be informed about the solution and cannot taken any feedback from her/him, the registration is closed as “out of reach”. Also, anonymous grievances will be addressed in the Project.

c. Continuous improvement:

All grievances and feedbacks will be handled with a fair and objective approach. Transparency and accessibility are also two main concerns of this redress mechanism.

In addition, the number, frequency, topics of grievances and feedbacks will be analyzed and reported periodically to the related units and administrative level.

Based on these detailed reports, the most frequently addressed issues are identified and improvement activities are initiated

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

