REPUBLIC OF TURKEY
MINISTRY OF INDUSTRY AND TECHNOLOGY

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

Draft
STAKEHOLDER ENGAGEMENT PLAN

27 November 2019

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.

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
TDA	Turkish 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
GRM	Grievance Redress 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

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 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.

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[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).*

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 andlocal 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

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 1.

Figure 2. Project Diagram
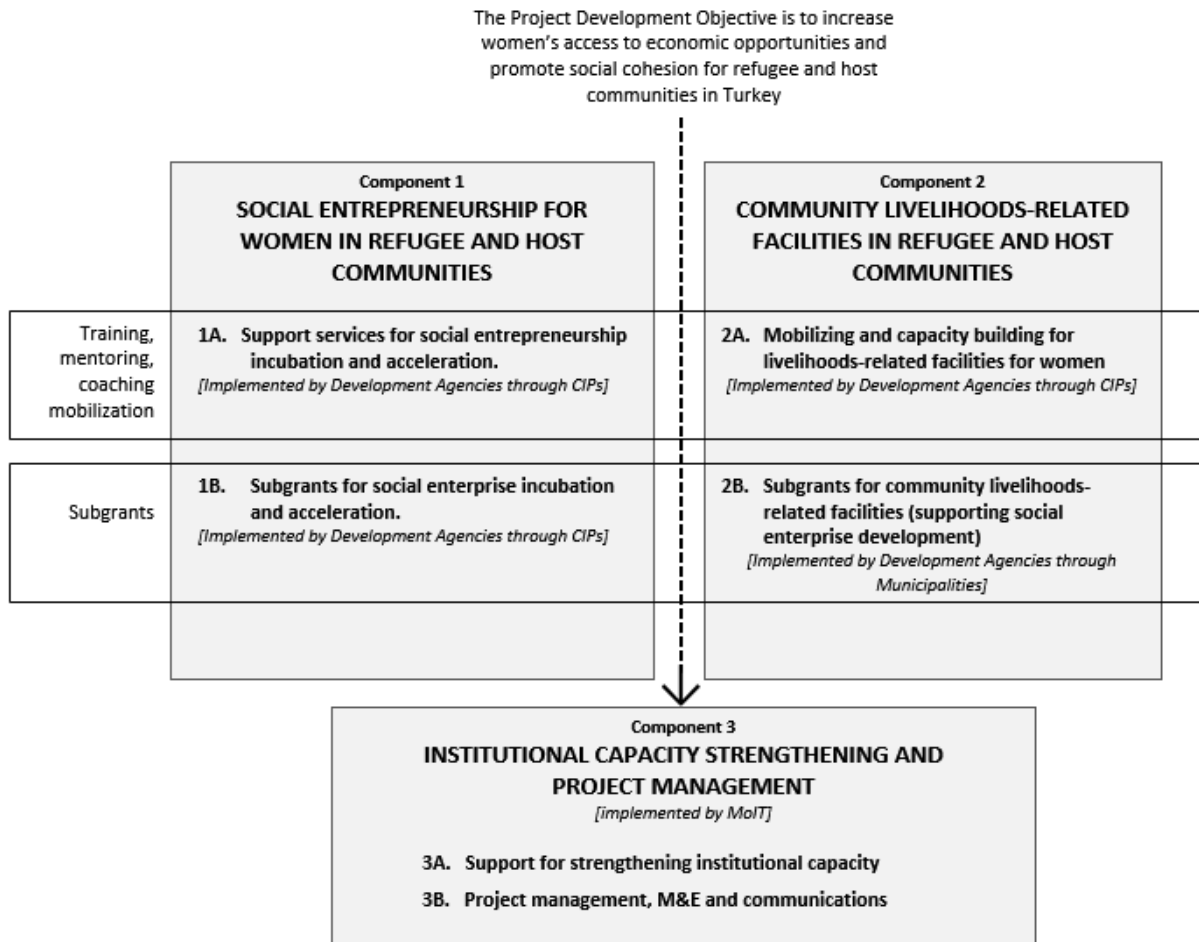
Component 1: Social Entrepreneurship for Women in Refugee and Host Communities

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.

The program of incubation support services will target approximately 2,200 beneficiaries and accelerator support services 190 (refugee and host community members in equal numbers), 1,800 new social enterprises will receive subgrants and 180 existing enterprises will receive acceleration sub-grants. 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 US$ 100,000 and the maximum will be set at US$ 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.

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 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 ESMPs. 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 GRM, 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.

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 redress/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.

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 redress mechanism.

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[1]."

Right to Constitutional Complaint (Constitution, Article 148)

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

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

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.

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].

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[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*

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.

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	• 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	• 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	Osmanyie Cevdetiye Refugee Camp	• 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	• 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 partnerships with university and chamber of commerce in order to foster business development
Gaziantep	July 9, 2019	İpekyolu Development Agency	• 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 Mediterreanean, Karacadag, Dicle Development Agencies and DG of Development Agencies, MoIT	• 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 Mediterreanean DA, Diyarbakir-Karacadag DA, Mardin- Dicle DA and Sanliurfa-Karacadag DA	• 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	• Key steps and requirements of the new projects funded under the Facility for Refugees in Turkey
Ankara	July 5, 2019	UNHCR	• Learning experiences and knowledge sharing on entrepreneurship projects of UNHCR on the ground
Ankara	July 4, 2019	UNDP	• Learning experiences and knowledge sharing on projects of UNDP on the ground
Ankara	July 4, 2019	ILO	• 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	• 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 women's hygiene, child-friendly spaces with kindergarten facilities
Gaziantep	July 9, 2019	Gaziantep Metropolitan Municipality-ENSAR community center	• 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	• 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	• 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	• 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

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.

Public consultations for the ESMF drafted by MoIT will take place before project effectiveness and key points of discussions will be updated in this SEP, together with the outcomes of beneficiary dialogues.

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 rigid have more difficulties maintaining social cohesion in situations where there is rapid social change,

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[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.

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 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,

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[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.

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

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.

Key development partners working with the Turkish authorities in refugee response programs, like UNHCR[19], 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

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[17] Kabeer, 2011 in Georgia, T, ibid.
[18] De Berry, Op Cit.
[19] UNHCR, July 2019, Factsheet, Communication with Communities:
https://reliefweb.int/sites/reliefweb.int/files/resources/71060.pdf

- 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, 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).

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 Parties (OIP)	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, 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

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
Existing social enterprises (cooperatives, limited liability companies, sole	Existing social enterprises will be able to apply for support under the project, and those selected will benefit from grants and capacity-building	High

traders, associations, corporations and foundations)		Red
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 Adana, Mersin, Gaziantep, Adıyaman, Kilis, Mardin, Hatay, Osmaniye, Kahramanmaraş, Diyarbakır and Şanlıurfa.	DAs will be responsible for the implementation of all aspects of the project at local level (including through CIPs); provide technical and financial resources for enterprise development and the overall development of the entrepreneurship ecosystem in their regions	High
Government Authorities (Local Level)		
Municipal and other local Authorities	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	High

(Councilors and administrators)	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 (national level)	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 and take decisions, if requested.	Medium
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	Depending on which part of the market value chain to which they provide	Low

community businesses	goods/services, existing community businesses may benefit from, or provide support or investment in, social enterprises under the project.	
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

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	They do not have sufficient opportunities for livelihood generation and social entrepreneurship Language barriers of refugee communities Eagerness to engage and integrate to Turkish society	• 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	• 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	• 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 social enterprise development and participatory engagement in livelihoods facilities
Women and youth from host communities	They do not have sufficient opportunities for livelihood generation and social entrepreneurship	• The project will provide them with funding for livelihood generation and social entrepreneurship • The selection of	• Women may face challenges that might hinder the sustainability of the enterprises, such as child care, safe transportation, working outside their neighborhoods,	• 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

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	Women and youth have lower rates of employment Openness to engage with women and youth groups from refugee communities, however less interest to integrate/harmonize	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	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	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 vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure.	• 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	• Vulnerable people among both host and refugee communities may face challenges to affectively attend the project activities. This could be due to language barriers, illiteracy or other challenges such as different disabilities • They may have certain disabilities which may limit them to benefit from the project equally as other beneficiaries.	• During outreach activities of CIPs and project information disclosure activities, certain measures will be undertaken to include vulnerable groups in the project. • For those disabled persons who want to engage in the project, the project will include measures for their accessibility. • 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 Syrian refugees at the expense of Turkish hosting communities	• They will have opportunities to express their priorities/preferences to determine which municipal livelihood generation assets/facilities should be established/renovated • The project's activities will not exacerbate social tensions among refugees and hosts, and other members of the community	• Limited buy-in/willingness from the community • Tensions/community concerns over funding being spent on refugees rather than host communities	• 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 • Proactive efforts to disseminate information regarding the project • Social cohesion baseline survey/monitoring • Project feedback/grievance redress mechanism
Owners/leaders of existing social enterprises	• 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	• 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	• 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	• 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	• Child neglect if there is no childcare support or alternatives • Child labor in project-supported social enterprises	• 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 enterprise and livelihoods facilities development	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 of Conduct for project workers as well as principles and procedures for workers' grivance 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	• 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

Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
OTHER INTERESTED PARTIES				
Government Authorities				
Presidency of Republic of Turkey, FRIT Coordination Office	• 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	• 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	• 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	• 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	• DGMM membership on FRIT Steering committee • Regular reporting to DGMM on project activities and regular briefing by WB and MoIT teams
Ministry of Family, Labor and Social Services	Ministry is coordinating the Government's ESSN Exit Strategy. MoLSS can establishes 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	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	• 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	• 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

Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
	residents and temporary workers that impact project success. In addition, the DG of Women Status is in charge of fostering women cooperatives	employment growth to incentivize women's self-employment and entrepreneurship opportunities for both women and youth		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 exist 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
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	• 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	• 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	That the project achieves its results, and that it is implemented effectively by the selected Development Agencies per WB safeguards, FM and procurement standards	• 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

Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
	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			
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	• Limited experience with social enterprises • No prior experience working with the World Bank • Very different operating environments across DAs	• Capacity building of DAs under Component 3 and collaboration with CIPs • World Bank engagement and capacity building • 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.	Establishing assets/facilities that are in line with municipal plans/priorities Having successful social enterprises for host and refugee communities	• 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	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 • 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,	To deliver outputs on time based on CIP terms of reference • To have well defined written instructions and program reporting	The pool of CIPs in selected locations may have limited experience with incubation and acceleration support services, grant-making, community development and institutional	• Market analysis and identification of possible well qualified CIPs • Exchange of knowledge/experience across CIPs • Beneficiary feedback/grievance redress mechanisms

Stakeholder	Concerns & Issues	Expectations from Project	Risks	Mitigating Measures
	and the community mobilization/decision-making and social cohesion activities • 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	templates to comply with DA, MoIT and WB requirements	capacity building • The CIPs may have difficulty in managing funding and resources and effective implementation	• Project M&E and CIP reporting to DAs
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	• 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	• 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)	• Document and disseminate successes (and challenges) with regard to the ESSN exit strategy • Highlight social tensions between host and refugee communities • Highlight successes of social enterprises led by vulnerable women and youth • Highlight instances of social cohesion	The project will have positive outcomes with regard to social enterprises and social cohesion	• 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 support provided to refugees and/or aggravate social tensions and risks	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

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.

Table 5. Roles and Responsibilities for the Stakeholder Engagement Program

Subgroup	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Venue	Frequency	Responsible Party
Women and youth from refugee communities **Women and youth from host communities** **Owners of existing social entrprises** **Mukhtars**	Preparation and Implementation	Non-technical summary of project and its environmental and social impacts	Beneficiary Dialogues Participatory needs assessment/ planning/Participatory monitoring	To apprise target beneficiaries and communities of project activities, potential environmental and social risks	Localities in target municipalities that are accessible to subgroups	Once prior to ESMF finalization	MoIT PIU
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	
FRIT Steering Committee (Implementing Partners)	Implementation	Emails; progress reports; PPTs; regular briefings	Official meetings	Share information regarding progress and challenges of project implementation	MoIT Office	Semi-annual	

Subgroup	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Venue	Frequency	Responsible Party
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	MoIT PIU
Private Sector e.g. KOSGEB, chambers of commerce (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	
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	
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	
Municipal Authorities (Implementing Partners)	Preparation, implementation, post implementation	Non-technical project summary; implementation/planning 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
Community Implementing Partners (Implementing Partners)	Preparation, implementation	Call for Proposals. project planning/implementation 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 mobilization/decision-making and	Offices of DAs/CIPs	Ongoing	

Subgroup	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Venue	Frequency	Responsible Party
				social cohesion activities envisaged under Component 2			
Public in target areas	Preparation, implementation	Leaflets, posters (in print and online), and videos online and social media dissemination, outdoor ads with messages tailored to cities. TV/radio tbd	Local information meetings, sectoral meetings,	Discuss, exchange ideas and provide a clear understanding on the description of social entrepreneurship and the Project's socio-economic benefits to both refugee and host communities; outreach regarding livelihoods facilities to benefit broader communities	Target areas in municipalities that are accessible by the general public	Ongoing- prior to sub grant cycles; participatory needs assessments and participatory planning cycles	
Contractors	Preparation, implementation	PPTs on WB requirements, including procurement and safeguards	• Presentations • Public meetings	Apprise contractors of WB procuremet and safeguards requirements	DA offices		
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 evaluatoins	Evaluate beneficiary perceptions of project outcomes and processes		Twice – baseline & completion surveys	MoIT/DAs
For Component 1							

Subgroup	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Venue	Frequency	Responsible Party
Women and youth from refugee communities Women and youth from host communities Vulnerable groups Existing Social Enterprises	Implementation.	• 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 circumstances, house visits may also be utilized as needed. • For illiterate, verbal and non-technical communication will be utilized in public	• Consultation/public participation meetings • Focus group discussions • Presentations • Capacity building workshops • Grievance redress/beneficiary feedback mechanism • Information desks in CIP offices	Promote enrollment and provide capacity building in the social entrepreneurship incubation and acceleration program To provide feedback, through an annual event and interactive scorecard/community check meeting on the quality of the training and mentoring services	Offices/ locales in the target municipalities that are accessible to subgroups	Prior to each of the approximately 60 cycles of subgrants across three years Annual scorecard event as part of community check meeting	Community Implementing Partners

Subgroup	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Venue	Frequency	Responsible Party
		participation meeting					
Community-Based Organizations/ Women's Livelihoods Committees Community members/ leaders		• Printed materials (posters and brochures)	• Consultation meetings • Focus group discussions • Grievance redress/beneficiary feedback mechanism • Information desks in CIP offices	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		• Printed materials (posters and brochures) • Capacity building materials	• Consultation meetings • Focus group discussions • Grievance redress/beneficiary feedback mechanism • Information desks in CIP offices	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	
For Component 2							
Women and youth beneficiaries from refugee communities Women and youth beneficiaries from host communities Community Members/Mukhtars	Implementation	• PPTs • Printed materials (posters and brochures)	• Participatory planning • Grievance redress/beneficiary feedback mechanism • Information desks 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
Municipal Authorities (Implementing Partners)		• PPTs	Consultations, official meetings, workshops	To ensure local coordination of all project activities and to implement Component 2B; align project	Municipal offices		

Subgroup	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Venue	Frequency	Responsible Party
		• Implementation/planning documents • Capacity building materials		support with municipal planning municipalities			

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.

5.2.6 Grievance Redress Mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project. Dedicated communication materials (GRM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures. In

face-to-face meetings, the GRM and its details will also be verbally communicated for those who are illiterate. A GRM guidebook/manual will also be developed and suggestion boxes installed in each affected municipality and village. In order to capture and track grievances received under the project, a dedicated GRM Management Information System/database is planned. Internal GRM 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 GRM committee works, both in terms of process and deadlines. Refer to next section.

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

6. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT

6.1 Elaboration of 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 -- Responsibilities of key actors/stakeholders in SEP Implementation

Stakeholder	Responsibilities
MoIT PIU- Communications and Stakeholder Specialist	• 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: • 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	• 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: • 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	• 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 • Announce important construction activities (such as road closures and available alternatives)

6.2 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. Details about the Project Grievance Redress 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).

6.3 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.

6.4 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 redress/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 REDRESS MECHANISM

7.1 Purpose and Scope

The DAs and MoIT receive formal requests and grievances through the Presidential Communication Center (CIMER). Other than CIMER, DAs can receive formal grievances either in a writing or through their online web channels. Given that all kinds of complaints are received by CIMER from the public and tracing project-specific requests, concerns or complaints will be difficult through CIMER, also it is only available to Turkish citizens, a project specific grievance mechanism will be needed. In accordance with the requirements of the World Bank, a grievance mechanism open to the use of all stakeholders, directly or indirectly affected by the project will be established.

The project-based GRM is intended to serve as a mechanism to:
- Allow for the identification and impartial, timely and effective resolution of issues affecting the project;
- Strengthen accountability to beneficiaries, including project affected people, and provide channels for project stakeholders and citizens at all levels to provide feedback and raise concerns.

Having an effective GRM in place will also serve the objectives of: reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of

project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes. The GRM will also allow submission of anonymous grievances. The attached grievance form in Annex 1 will be utilized in the project and allow submission of anonymous grievances. In addition, the project GRM will include a channel to receive and address confidential complaints related with Sexual Exploitation and Abuse/Sexual Harassment in workplace (social enterprises).

In addition, as part of the Labor Management Procedures, drafted by MoIT, MoIT PIU will also set up a worker's grievance mechanism for project workers, who are staff of MoIT, DAs and contracted workers.

7.2 GRM Overview & Structure

Who can communicate grievances and provide feedback? 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, community members, project implementers/contractors, civil society, media—all of who will be encouraged to refer their grievances and feedback to the GRM.

What types of grievance/feedback will this GRM address? 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 by DAs and CIPs
- General feedback, questions, suggestions, compliments.

Standards. The SEECO 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 5 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 MoIT PIU head.

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

Community Level. To ensure that the GRM is accessible to people 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 CIPs.

Regional/DA Level. DAs will also appoint respective GRM focal points that can either receive feedback directly from stakeholders, or to whom the community level GRM focal points can escalate issues/complaints.

Central/PMU Level. If there is a situation in which there is no response from the community/DA 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.

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.

7.3 GRM Communication & Process

Communication. Information about the project's GRM will be publicized as part of the initial feedback consultations in the participating communities. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in project offices, local and municipal notice boards, community centers, government offices, etc. Information about the GRM will also be posted online on the PIU website, available in both languages, Turkish and Arabic. Details will be updated in Project Operational Manual and in this SEP, before project effectiveness.

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

Figure 3. Feedback and GRM Process
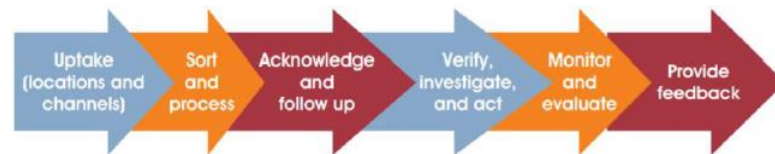
Source: Agarwal, Sanjay and Post, David. 2009. Feedback Matters:

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

Step 1: Uptake. Project stakeholders will have the opportunity to provide feedback and report complaints through several channels (in-person, mail, telephone, project website) at different levels.

Step 2: Sorting and Processing. To consolidate, monitor and report on information related to grievances, complaints and feedback related to the project will be documented upon receipt/communication at each level of the GRM, and will be classified in order to manage the grievance redress process more effectively. Feedback/complaints regarding environmental or social issues related to the project activities will be logged in the MIS and documented.

Step 3: Acknowledgement and Follow-Up. Within 5 days of receiving complaint/feedback, the grievance redress focal point will inform the complainant about the timeframe and the likely course of action. At the 5-day mark, if a complaint/question is still pending, the GFP in charge of the complaint at that point should provide an update about the status of complaint/question to the person who submitted it and provide an estimate of how long it will take to resolve the grievance or respond to the query.

Step 4: Verification, Investigation & Action. Verification and investigation involve gathering information about the grievance to determine its validity and to generate a clear picture of the circumstances

surrounding the issue under consideration. This process normally includes site visits, document reviews, a meeting with the complainant (if known and willing to engage) and meetings with individuals and/or entities who can assist with resolving the issue. Potential actions include responding to a query or comment, providing users with a status update, imposing sanctions, or referring the grievance to another level of the system for further action. Depending on which channel the grievance is received, the verification and investigation can be conducted by the GFP in the CIP, or by the M&E staff in the DA or by the communications specialist at the PIU of MoIT.

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

Step 6: Providing Feedback. This step entails informing GRM users and the public at large about the results of investigations and the actions taken. Grievance redress focal points will provide feedback by contacting the complainant directly within a 30-day period of receiving the feedback/complaint. The PIU will make quarterly reports available to the World Bank team on the implementation of the Project GRM. In addition, data on grievances and/or original grievance logs will be made available to World Bank project supervision missions.

7.4 Grievance Logs

The Grievance Focal Points at the CIP level will maintain local grievance logs to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. A sample grievance form and a close-out form is attached in Annex-1.

7.5 Monitoring and Reporting on Grievances

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

- Collecting and analyzing the qualitative data from grievance redress focal points on the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GRM mechanisms to the Project Coordinator at the PIU.

Quarterly reports to be submitted by the PIU shall include a section related to GRM which provides updated information on the following:
- Status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on number of received grievances \ (applications, suggestions, complaints, requests, positive feedback), number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
- Level of satisfaction by the measures (response) taken;
- Any correction measures taken.

Results posted on the PIU and DA websites.

7.6 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

Annex 1. Sample Grievance Form and Grievance Closeout Form

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

GRIEVANCE CLOSEOUT FORM		
ASSESSMENT OF THE GRIEVANCE		
Corrective Action Required:	□ **YES**	□ **NO**
	Please describe the action if it is required to close-out the case	
RESULT		

CLOSEOUT

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.)

Responsible Person	Complainant
Name-Surname	Name-Surname
Date and Signature	Date and Signature (If possible)