



ILBANK

**Stakeholder Engagement Plan (SEP) - Türkiye Earthquake
Recovery and Reconstruction Project - P180849**

Stakeholder Engagement Plan (SEP)

April 2023

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Abbreviations

CIMER	The Presidency’s Communication Center
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GASKİ	Gaziantep Water and Sewerage Administration
GM	Grievance Mechanism
GRS	Grievance Redress Service
HATSU	Hatay Water and Sewerage Administration
ILBANK	İller Bankası A.Ş.
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-governmental Organization
PAP	Project Affected People
PDO	Project Development Objective
PIU	Project Implementation Unit
PPM	Public Participation Meeting
RP	Resettlement Plan
SEP	Stakeholder Engagement Plan
SKI	Water and Sewerage Administrations
ŞUSKİ	Şanlıurfa Water and Sewerage Administration
TERRP	Türkiye Earthquake Recovery and Reconstruction Project
WB	World Bank

GLOSSARY

Grievance Mechanism: It is a mechanism that has been developed for potential use by project stakeholders to achieve mutually agreed resolutions for their grievances. It ensures that complaints and grievances are addressed through a transparent and impartial process.

Implementing Agency: Refers to the İller Bankası A.S (ILBANK), which will assume overall responsibility for components 1 and 4a of the project.

Project: Türkiye Earthquake Recovery and Reconstruction Project

Project Implementation Unit (PIU): Refers to the staff of PIU to be established under the International Relations Department of ILBANK.

Stakeholder: Refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may get involved directly or/and have an interest in the project (other interested parties).

Stakeholder Engagement: It is a continuous process used by the project to engage relevant stakeholders to generate sense of ownership to the project and 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.

Stakeholder Engagement Plan (SEP): A SEP is a tool for managing communications with the project stakeholders at the project level. The SEP will describe the timing and methods of engagement with stakeholders throughout the life cycle of the project as agreed between Bank and Borrower, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them.

EXECUTIVE SUMMARY

Will be added when it is finalized

1. Introduction

This document is a Stakeholder Engagement Plan (SEP) that explains the stakeholder consultation and engagement process planned and to be implemented for the components 1 and 4a of the Türkiye Earthquake Recovery and Reconstruction Project (TERRP or Project) and prepared by ILBANK. ILBANK will establish a Project Implementation Unit (PIU) to implement the components and this SEP.

The SEP has been prepared in accordance with the World Bank's ESS10 Stakeholder Engagement. Stakeholder engagement is an inclusive process that will be carried out throughout the life of the project. When properly designed and implemented, it supports the establishment of strong, constructive and sensitive working relationships that are important for the successful management of the project's environmental and social impacts and risks. This SEP provides a structure to support the establishment of a continuous engagement process between ILBANK and those who potentially would be impacted or have any kind of interest in the Project. Besides, it will also help to manage stakeholder expectations and support the management of risks, and therefore reducing potential conflicts and project delays by providing early, frequent and open communication throughout the life of the project.

Another goal of this SEP is to improve and facilitate decision making and create continuous dialogue between ILBANK itself and project-affected people (PAP) and other stakeholders in a timely manner, and to ensure that these groups are provided equal and sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

The key objectives of the SEP can be summarized as follows:

- Identifying stakeholders directly or indirectly affected by the Project and/or interested in the Project.
- Identifying and planning stakeholder engagement activities that will begin during Project preparation and continue with the implementation of the Project.
- Setting out the frequency, content, information sharing and level of participation of consultation activities
- Implementing a Grievance Mechanism that will create an open communication channel for stakeholders to raise concerns/complaints at every stage of the Project.
- Ensuring that concerns and expectations expressed by stakeholders are addressed during the decision-making and planning stages of the Project.

Effective stakeholder engagement promotes a “social license” to operate and is founded on mutual trust, respect and transparent communication between investing municipalities and its stakeholders. A well-established stakeholder engagement process improves decision making as well as increasing project performance by managing costs and risk, avoiding conflict, improving corporate policy, providing continuous feedback to management on project implementation and impacts, and managing stakeholder expectations.

2. About the Project

The Project Development Objective (PDO) is to restore access to essential services and to resilient housing in selected provinces affected by the February 2023 earthquakes.

3. Project Components

The Project includes four components: Component 1. Restoration of Municipal Infrastructure and Services; Component 2. Restoration of Health Services; Component 3. Emergency Housing Support and Recovery; Component 4. Project Management, Monitoring & Evaluation.

Component 1. Restoration of Municipal Infrastructure and Services

Subcomponent 1.1. Resilient rehabilitation and reconstruction of municipal infrastructure:

This subcomponent will finance rehabilitation and reconstruction of existing municipal water, sanitation, wastewater, and drainage services damaged by the earthquakes. Eligible activities will include the repair and reconstruction of damaged water and sewage networks, water treatment plants, wastewater treatment plants, stormwater drainage, etc. to be more disaster and climate resilient and, as such, be better adapted for the climate change and/or would consider introduction of climate-smart/nature-based technologies and solutions contributing to climate change mitigation. The subcomponent may also support the installation of temporary water and sanitation facilities for container cities, such as package wastewater treatment plants, solar thermal hot water collectors, portable rainwater storages, etc., as needed. This subcomponent will also finance rehabilitation and resilient reconstruction of municipal roads, bridges, underpasses, and allied infrastructure that have been damaged by the earthquakes.

Subcomponent 1.2: Resilient Recovery of critical municipal service facilities. This subcomponent will finance the rehabilitation and reconstruction of municipal fire station buildings and purchase of equipment required to restore the provision of firefighting, emergency response, and other critical municipal services. Eligible activities will include inter alia: (a) installation of prefabricated facilities to provide critical municipal fire and emergency services during transition periods and ensure continuity of services, as needed; (b) repair and strengthening of lightly damaged municipal fire stations; (c) in-situ resilient reconstruction of destroyed, heavily and moderately damaged municipal fire stations or reconstruction of such facilities in new locations as deemed acceptable according to the World Bank's ESF; and (d) the acquisition of emergency response and municipal services equipment and vehicles (e.g. firefighting and rescue vehicles and equipment, solid waste collection vehicles, buses, street sweeping vehicles, etc.) to restore municipal capacity for essential service provision. These activities will also contribute to strengthening the capacity and preparedness of the affected municipalities to respond to future disasters, including climate change-imposed challenges and the expected growing impact of extreme weather and natural hazards.

Component 2. Restoration of Health Services. The responsibility for overall management and implementation of Component lies with the MoH through the existing Project Management Support Unit (PMSU). This component will support activities to ensure continuity of access to health services for the affected population in the immediate and short-term. This will include establishing and ensuring the operation of prefabricated primary health care (PHC) facilities and equipping field emergency hospitals, establishing a network of field and mobile PHC and diagnostic services, restoring depleted medical supplies, improving access to vaccination, supporting access to disability support, and supporting sanitation measures to ensure clean water and prevent infectious diseases.

Subcomponent 2.1. Ensuring continuity of primary-level and hospital-level health services: This subcomponent will support the establishment of a network of fixed prefabricated family health centers supported by mobile PHC units. The prefabricated facilities are needed to replace the collapsed, heavily, and moderately damaged primary health care buildings (Family Medicine

Centers) in the earthquake region until permanent PHC facilities can be reconstructed. The mobile units will also allow health care providers to provide services to displaced population in tent camps, container cities, refugee shelters and scattered villages in rural areas. In line with MoH's interim strategy to restore PHC services, the subcomponent will finance: (i) the installation of 350 prefabricated, fully equipped family health centers with an average of 3-4 family medicine units in each, for primary health care service delivery in the region; and (ii) procurement of 250 mobile health clinics to reach out to the different temporary settlements with large, displaced population and rural regions. This subcomponent will also support the operation of eleven prefabricated emergency hospitals through the procurement of furnishings and medical equipment.

Subcomponent 2.2: Providing mobile pharmaceutical and diagnostic services. This subcomponent will establish a network of mobile diagnostic services to support the field emergency hospitals and prefabricated PHC facilities. Activities will include the purchase of: (i) vehicles equipped with mobile imaging equipment, (ii) mobile public health laboratories for microbiology and water analysis, (iii) mobile computerized tomography devices, (iv) mobile digital X-ray and ultrasound devices, (v) home health care services vehicles and related kits, (vi) ambulances and fully equipped medical all-terrain vehicles, and (vii) mobile command control vehicles..

Subcomponent 2.3: Supporting access to vaccination, disability services, and medical equipment: This subcomponent will finance activities to restore MoH's capacity in vaccination, address the needs of people disabled due to the earthquakes, and curb the spread of infectious diseases. Activities will include: (i) the replacement of damaged provincial and district vaccine warehouses with prefabricated and light steel construction vaccine storage containers to be located in the major cities of Hatay, Malatya, Kahramanmaraş, Adıyaman and Adana that will service as regional vaccine warehouses for the earthquake region; (ii) provision of vaccine transport vehicles to ensure timely distribution of vaccines from the regional warehouses to settlements across the earthquake region, including container cities, dispersed villages in rural areas, and refugee shelter camps; (iii) provision of equipment for disability services, including inter alia, microprocessor prosthesis, orthotics and prosthesis, and battery powered wheelchairs; (iv) provision of equipment and capacity building for physical therapy and rehabilitation centers in earthquake-affected provinces; and (v) provision of essential medical supplies such as biocidal products and rapid test kits.

Component 3. Emergency Housing Support and Recovery. The responsibility for overall management and implementation of Component 3 will lie with MoEUCC's General Directorate for Construction Affairs (GDCA), in close coordination with AFAD, the Strategy and Budget Presidency (SBP), the MoTF, and other relevant directorates of MoEUCC.

Subcomponent 3.1: Rural housing reconstruction: This subcomponent will finance civil works, consultancy, and non-consulting services to support the recovery of the earthquakes-affected rural villages under the government's existing post-disaster housing reconstruction program. For resilient reconstruction of rural houses assessed as collapsed, severely or moderately damaged, preference will be given for in-situ reconstruction to the extent possible under the Project. Civil works for infrastructure will support the repair of damaged municipal infrastructure/engineering networks where housing is reconstructed in situ and the new construction of such infrastructure where housing is being relocated to new sites. The subcomponent will also provide technical assistance to strengthen the current post-disaster rural housing program.

Subcomponent 3.2: Resilient recovery foundations for cities and inclusive post-disaster housing support: This subcomponent will finance technical assistance and advisory services to AFAD's General Directorate of Housing and Construction Works, and MoEUCC's General Directorate of Construction Affairs to support planning for medium/longer term resilient reconstruction and improve post-disaster housing programs for future disasters..

Component 4. Project Management, Monitoring & Evaluation

This component will finance consultant and non-consulting services, goods, training, and operating costs for supporting the Implementing Agencies in project management and implementation activities under the Project, including for, but not limited to, monitoring and evaluation, reporting, procurement, financial management, environmental and social management, grievance redress mechanism, and project communication and outreach.

This SEP is prepared by ILBANK for Component 1 and Component 4a activities of TERRP. The Component 2 and Component 4b will be implemented by Ministry of Health and the Component 3 and Component 4c will be implemented by MoEUCC and there will be separate SEPs for these components.

4. Regulations and Requirements

4.1. National Legislation for Stakeholder Engagement

Law on Transformation of Areas under Disaster Risk (No. 6306)

The Law on Transformation of Areas Under Disaster Risk, dated 31.05.2012 and numbered 6306, constitutes the procedures and principles regarding improvement, demobilization and reconstruction of the areas under disaster risk, as well land with risky structures inside and outside the disaster risk areas, in order to provide healthy and safe living environments in accordance with scientific and cultural norms and standards.

Right to Information Act (No. 4982)

The purpose of this law is to regulate the procedure and basis of the right to information in accordance with the principles of equality, impartiality and openness, which are the requirements of a democratic and transparent government. According to the obligation to provide information (Article5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of information and documents, considering the exceptions set out in this law, to provide information to applicants; and to evaluate and decide on applications promptly, effectively and correctly.

Law on the Exercise of the Right to Petition

Based on "Article 3 of the Law on the Exercise of the Right to Petition", citizens of the Republic of Türkiye, may submit their complaints to the Grand National Assembly of Türkiye through written petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Türkiye are entitled to enjoy this right.

Constitution of the Republic of Türkiye

Stakeholder engagement is secured by the Constitution of the Republic of Türkiye. The Constitution contains provisions that ensure that people can freely express their views. Article 25 of the Turkish Constitution is the article "Freedom of thought and opinion". According to this article, nobody can be forced to express their thoughts and convictions for whatever reason and purpose; cannot be condemned or accused because of his thoughts and convictions. As emphasized by the "Freedom to Explain and Spread Thought (Article 26 of the Constitution of the Republic of Türkiye)"; everyone has the right to express and disseminate their thoughts and opinions individually or collectively by word, text, picture or other means. This article also covers the freedom to receive or impart information or ideas without the intervention of the official authorities. At the same time, everyone has the "Right to Petition" (Article 74 of the Constitution of the Republic of Türkiye). Accordingly, the principle of

reciprocity citizens and foreigners residing in Türkiye on condition that observance, on their own or with the wishes and complaints about public authorities and Türkiye has the right to appeal in writing to the National Assembly.

The Presidency's Communication Center (CİMER) is an official government tool used to receive requests, complaints and applications from the public. Communication channels of CİMER are as follows:

Website	https://www.cimer.gov.tr https://giris.turkiye.gov.tr/
Hotline	150
Post Address	T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara
Telephone	+90 312 590 2000
Fax	+90 312 473 6494

Public institutions and organizations shall provide the requested information within 15 working days. If the requested information or document is to be obtained from another unit within the relevant institution or if the opinion of another institution is required or the content of the application pertains to more than one institution; the access shall be provided within 30 working days. In this case, the applicant shall be informed in writing about the extension and its reasons within 15 working days (Article 11).

Regulation on Environmental Impact Assessment

The Environmental Law No. 2872, which was published in the Turkish Official Gazette No. 18132 dated 11 August 1983 and amended in the Official Gazette dated 29 Mays 2013 (by Law No. 6486), establishes the underlying legal framework of the environmental legislation in Türkiye and is supported by a large number of regulations. Article 10 of the Environmental Law constitutes the main framework of the Environmental Impact Assessment Regulation (EIA Regulation) published in the Official Gazette No. 31907 dated 29 July 2022.

Within the scope of EIA, for the projects included in the Annex-I list, a public participation meeting (PPM) will be organized by the bodies and organizations authorized by the MoEUCC with the participation of the project owner on the date set by the MoEUCC and at the place and time determined by the Governor's Office before the Committee determines the scope to inform the public about the investment and to hear their opinions and suggestions regarding the project.

4.2. World Bank Requirements for Stakeholder Engagement

World Bank Requirements

The Environmental and Social Standard (ESS) 10 "Stakeholder Engagement and Information Disclosure" of the World Bank's Environmental and Social Framework (ESF) recognizes, " the importance of open and transparent engagement between the Borrower (ILBANK PIU) and project stakeholders as an essential element of good international practice." In more detail, the requirements set out by ESS10 are as follow:

1. "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"

2. “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.”
3. “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.”
4. “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)”.

ILBANK PIU will be responsible for the implementation the SEP which is prepared in compliance with the WB ESF and national legislation.

ILBANK PIU will be responsible to respond to the suggestions and grievances raised by the project affected parties regarding the environmental and social performance of the project in a timely manner. To this end, the ILBANK PIU will propose and implement a grievance mechanism (GM) to receive and facilitate resolution of suggestions and complaints. The scope, scale and type of the required GM will be proportionate to the nature and scale of the potential risks and impacts of the project. The GM may include: (i) enable submission of grievance and concerns in person, by phone, e-mail and/or website; (ii) a log where grievances are registered in writing and maintained as a database; (iii) publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances; (iv) transparency about the grievance procedure, governing structure and decision makers; (v) an appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

5. Brief Summary of Previous Stakeholder Engagement Activities

After the devastating earthquake on 6 February, 2023, ILBANK International Relations Department's teams moved to the field in accordance with the emergency situation. Furthermore, different teams moved to the relevant field to assist the field team on different dates.

The teams were divided into regions and some of them discussed with the municipalities/Water and Sewerage Administrations (SKIs) to figure out damages and their demands.

Municipality/SKI	Date
Hatay Metropolitan Municipality	08.02.2023-10.03.2023 and 27.03.2023-01.04.2023
HATSU	08.02.2023-10.03.2023 and 27.03.2023-01.04.2023
Kırıkhan Municipality	08.02.2023-10.03.2023
Samandağ Municipality	08.02.2023-10.03.2023
Reyhanlı Municipality	08.02.2023-10.03.2023
Antakya Municipality	08.02.2023-10.03.2023
Hassa Municipality	08.02.2023-10.03.2023
Kilis Municipality	08.02.2023-10.03.2023 and 27.03.2023-01.04.2023
Adıyaman Municipality	08.02.2023-10.03.2023 and 27.03.2023-01.04.2023
Gölbaşı Municipality	27.03.2023-01.04.2023
Tut Municipality	27.03.2023-01.04.2023
Besni Municipality	08.02.2023-10.03.2023 and 27.03.2023-01.04.2023
Gaziantep Metropolitan Municipality	27.03.2023-01.04.2023
Gaziantep Water and Sewerage Administration	27.03.2023-01.04.2023
Şanlıurfa Metropolitan Municipality	08.02.2023-10.03.2023 and 27.03.2023-01.04.2023
Şanlıurfa Water and Sewerage Administration	08.02.2023-10.03.2023 and 27.03.2023-01.04.2023

During the meetings, the main focus was to have a better understanding on (i) the level of damage of the earthquake on the respective municipality buildings, (ii) status of the infrastructure after the earthquake, (iii) utilities' assessment on the status and feasibility of their on-going projects, (iv) current status of the project for which construction site delivery is completed and the supervision consultants' view on starting the works. No community consultations were possible due to post-earthquake ground realities. Such consultations will be conducted as soon as possible and the SEP will be updated accordingly.

6. Stakeholder Identification and Analysis

Identifying stakeholders is an important step in the stakeholder engagement process. The World Bank's Environmental Social Framework categorizes the stakeholders under three groups as given below.

- **Project Affected Parties.** persons, groups and other entities within the Project Area of Influence (AoI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures
- **Other Interested Parties.** Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being

affected by the project and/or who could affect the project and the process of its implementation in some way.

- **Disadvantaged/vulnerable individuals or groups.** Persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project

Stakeholder Identification is an important step in managing the overall stakeholder engagement process. It reduces the risk of a narrow stakeholder group dominating the consultation process.

Within the scope of the Project stakeholder mapping and participation studies, the stakeholders have been classified according to stakeholder groups under three categories, 'Project-affected parties', 'Other interested parties' and 'Disadvantaged/vulnerable individuals or groups', are given under Table 1 below.

Table 1. Stakeholder Groups for TERRP

Component 1			Level of Interest	Level of Influence
Restoration of Municipal Infrastructure and Services				
Stakeholder Group				
Project Affected Parties	Direct Stakeholders	<ul style="list-style-type: none"> • Municipalities • Utilities • Communities likely to be affected by the construction works in the scope of component • Workers to be employed for the construction activities • Local businesses 	High	High
	Indirect Stakeholders	<ul style="list-style-type: none"> • Neighborhood residents • Local community organizations 	Medium	Medium
Vulnerable individuals or groups		<ul style="list-style-type: none"> • People with disabilities • Elderly individuals • Immigrants, refugees and non-native Turkish speakers • Children • People with post disaster trauma and mental health issues. 	High	low
Other Interested Parties		<ul style="list-style-type: none"> • Non-governmental Organization (NGOs) • Media • Public institutions 	Medium	Medium
		<ul style="list-style-type: none"> • Workers to be employed for the construction activities • Local administrators 	High	High
Component 4			Level of Interest	Impact Level
Project Management, Monitoring & Evaluation				

¹ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Stakeholder Group				
	Direct Stakeholders	<ul style="list-style-type: none"> • Municipalities • Utilities 	High	High
	Indirect Stakeholders	<ul style="list-style-type: none"> • Public institutions 	Medium	Medium

7. Stakeholder Engagement Program

7.1. Propose and timing of Stakeholder Engagement Program

The main goals of the stakeholder engagement program are to inform, disclose and consult on various project documents and activities early on to establish a dialogue with project stakeholders from project planning phase through the implementation and operation phases.

ILBANK will ensure that meaningful engagement, consultation and project information is disclosed to all stakeholders in consideration with some key guiding principles, including:

- Consultations will be widely publicized, particularly among project-affected stakeholders/communities, preferably one week before any meeting or commitment.
- A non-technical briefing will be available prior to any event to ensure that people are informed of the assessment and results prior to schedule meetings.
- The location and timing of meetings will be designed to maximize stakeholder engagement and availability.
- The information presented will be clear and non-technical and, where necessary, in all appropriate local languages.
- Participation will be facilitated to allow stakeholders to voice their views and concerns.
- Issues that arise will be addressed at meetings or at a later time.

7.2. Methods for Stakeholder Engagement

A variety of engagement techniques will be utilized to engage and consult with stakeholders, as well as to gather information from and deliver information to stakeholders.

The level of impact, in addition to the needs and concerns of the stakeholders will determine the basis of the communication tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in Table 2 below. The language of communication throughout the Project is expected to be Turkish; however, different languages will be also taken into consideration, if need be, to increase the efficiency of the engagement activities and ensure involvement of all stakeholder groups. The engagement activities will be carried out in a culturally appropriate manner and will include best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

Table 2. Engagement Methods to be employed under the Project

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> - Information sharing (in particular technical) on project requirements and impacts - Invitations to meetings and key events during project implementation - Arrangements for obtaining permits, licenses, transfer, and allocation of project land 	Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organizations/agencies

Engagement Method	Application/Purpose of the Method	Target Stakeholder
	<ul style="list-style-type: none"> - Information and data requests that will be utilized for project implementation 	
One-on-one meetings	<ul style="list-style-type: none"> - Information collection on an individual basis allowing stakeholders to voice their concerns/opinions about sensitive issues - Establishing personal connections with key actors 	Representatives of relevant state authorities and government officials, NGOs, local government, academia, and organizations/agencies, contractors and consultants
Formal meetings	<ul style="list-style-type: none"> - Collective information sharing on project requirements and impacts - Receiving comments, feedback, views and perception of project from a group of public institutions - Establishing relations with public institutions 	Different national and local government authorities and officials, NGOs, academia, and organizations/agencies, national and local media
Consultation meetings	<ul style="list-style-type: none"> - Information sharing (especially non-technical) to a large group of stakeholders, especially communities about the scope and timeline of the Project and sub-project activities. - Receiving comments, feedback, views and perception of project from a group of stakeholders - Collecting grievances and concerns related to the project - Establishing relations with affected communities, and groups 	Any stakeholder group identified throughout the project including the affected communities and groups, local NGOs, national and local government representatives/authorities, businesses, organizations/agencies, etc.
Face to face interviews	<ul style="list-style-type: none"> - Collecting baseline data on an individual basis with regard to project-affected people (PAPs) impacted by the project - Understanding, monitoring and assessing the project activities' environmental and social impacts and risks on an individual basis - Establishing relations on an individual basis 	PAPs, project workers (including workers to be employed for the construction activities, PIU staff, contracted workers, etc.), vulnerable/disadvantaged groups/people,
Focus group discussions	<ul style="list-style-type: none"> - Information sharing on a specific topic to a certain group of people including vulnerable groups - Receiving comments, feedback, views and perception of project from a certain group - Collecting grievances and concerns related to the project from a certain group - Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders - Establishing relations with certain groups 	Stakeholder groups relevant to the information to be shared and discuss during the meeting, vulnerable groups
ILBANK website	<ul style="list-style-type: none"> - Sharing project relevant information and update on progress - Disclosing project/subproject related documentation and communication tools: Environmental and Social Management Plan (ESMP), Resettlement Plan (RP), Ex-Post social audit document, grievance mechanism (GM), presentations, brochures, etc. - Announcements of key events (date/time, venue) 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses, and organizations/agencies
Digital communication tools social media (Facebook, Twitter,	<ul style="list-style-type: none"> - Non-technical information sharing and progress updates - Announcements of key events, dates and published documents related with the Project 	Any stakeholder group identified throughout the project including affected communities and PAPs,

Engagement Method	Application/Purpose of the Method	Target Stakeholder
<i>Instagram accounts, WhatsApp groups, national/local television channels, radio stations, SMS, etc.</i>		national and local media, academia, NGOs, businesses, and organizations/agencies
Project information brochures/leaflets	<ul style="list-style-type: none"> - Sharing brief project information to provide regular update - Informing the stakeholders on certain issues such as land acquisition, land entry and exit, project implementation schedule, scope of project activities and subprojects, etc. - Disseminating site-specific project information 	Any stakeholder group identified throughout the project including affected communities and PAPs, businesses and organizations/agencies
Online meeting (alternative tool if needed)	<ul style="list-style-type: none"> - Information sharing on a specific topic to a group of people including vulnerable groups - Receiving comments, feedback, views, and perception regarding the project from a certain group - Collecting grievances, concerns and feedback related to the project from a group - Monitoring project activities' environmental and social impacts and risks on a group - Establishing relations with local communities 	Any stakeholder group identified throughout the project, including project affected people, vulnerable groups, etc.
Grievance Mechanism (GM)	<ul style="list-style-type: none"> - Receiving and resolving any requests (such as suggestions, complaints, compliments, inquires for information or whistle-blower complaints) received by all project stakeholders 	Any stakeholder group identified throughout the project

7.3. Information Disclosure

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the lifetime of the Project. ILBANK will be in active communication with identified stakeholders throughout the lifetime of the project. In particular, ILBANK will seek feedback from stakeholders on the environmental and social performance of the project and the implementation of the identified mitigation measures and the Grievance Mechanism. If there are significant changes in the project resulting in additional risks and impacts, especially where they will affect the stakeholders, ILBANK will provide information on these risks and impacts and consult with the stakeholders on how to mitigate these risks and impacts.

All information regarding the Project will be made accessible on ILBANK's and WB's official websites. Within the scope of the project, brochures, leaflets, booklets and/or posters will also be developed to inform stakeholders about the project activities.

The ILBANK PIU will be responsible for the sharing, delivering and announcing of project documents, communication materials and GM.

In the light of information given in the previous paragraphs, the summary of the stakeholder engagement program is given in Table 3.

Table 3. The Overview of the Stakeholder Engagement Program

Project Phase	Consultation Subject/Message to be delivered	List of information to be disclosed	Method Used	Target Stakeholder	Frequency	Responsible Party
Preparation	<ul style="list-style-type: none"> • Inform the stakeholders about the scope and need of the Project. • Consult the stakeholders about <ul style="list-style-type: none"> ○ project design, ○ environmental and social risks and impacts, ○ proposed mitigation measures. ○ stakeholders’ views how project design can be improved to deliver greater benefits as part of the overall framework of “building back better” (including retrofitting of the existing facilities), such as climate and seismic resilience, universal design, etc. • ESMF, GMs 	<ul style="list-style-type: none"> • Project concept, E&S principles, and obligations • E&S documents (ESMF, RP) 	<ul style="list-style-type: none"> • Opening meeting • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools • Grievance Mechanism • Poster, brochure, leaflet, etc. • SMS 	<ul style="list-style-type: none"> • Project Affected Parties • Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>Before the commencement of component activities</p> <p>Throughout the project lifecycle</p>	<ul style="list-style-type: none"> • ILBANK PIU
Implementation & Construction	<ul style="list-style-type: none"> • Inform the stakeholders about the project scope and ongoing activities. • Inform back the stakeholders how their views that have been captured are being addressed. 	<ul style="list-style-type: none"> • ESMPs • RPs • GM procedure • Regular updates on Project development/ implementation 	<ul style="list-style-type: none"> • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools 	<ul style="list-style-type: none"> • Project Affected Parties • Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>Prior to start of implementation of the project, and as needed during the project lifecycle</p>	<ul style="list-style-type: none"> • ILBANK PIU • Supervision Consultants • Contractors

Project Phase	Consultation Subject/Message to be delivered	List of information to be disclosed	Method Used	Target Stakeholder	Frequency	Responsible Party
	<ul style="list-style-type: none"> Seek feedback from stakeholders on any emerging issues and/or problems and stocktake possible areas for correction and/or improvement. E&S documents (ESMF, ESMPs, RPs, etc.) GMs 		<ul style="list-style-type: none"> Grievance Mechanism Poster, brochure, leaflet, etc. SMS 			
Operation	<ul style="list-style-type: none"> GMs Stakeholders' perceptions and/or feedback to identify any issues encountered (post hand over) and remedial measures and/or enhancements. 	<ul style="list-style-type: none"> Project outputs Redress of grievances 	<ul style="list-style-type: none"> Closing Meeting Consultation meetings Disclosure meetings, Digital Communication Tools/social media Poster, brochure, leaflet, etc. SMS 	<ul style="list-style-type: none"> Project Affected Parties Disadvantaged/Vulnerable individuals or groups Other interested parties 	After completion of sub-project activities, during the one-year warranty period	<ul style="list-style-type: none"> ILBANK PIU Municipalities Utilities

7.4. Proposed Strategy for Including Views of Vulnerable Groups

It is of particular importance to understand whether project impacts disproportionately affect disadvantaged/vulnerable individuals or groups who are often unable to raise their concerns or understand the impacts of a project. Awareness raising and stakeholder engagement activities regarding the project should be implemented taking into account the special constraints and cultural sensitivities of these groups and individuals so that they fully understand the project activities and benefits. Interaction with vulnerable groups and individuals often requires special measures and assistance to ensure that these groups and individuals are well aware of the overall process and their contribution to the process is in balance with other stakeholders and focused on establishing their participation.

Within the scope of this Project, vulnerable individuals and groups can be disabled individuals, elderly individuals, and immigrants, refugees and non-native Turkish speakers. These groups in particular are experiencing certain disadvantages in benefitting from public services and are likely to be directly affected by Project.

Table 4 summarizes preliminary mapping carried out for the identification of the disadvantaged/vulnerable individual/groups as well as the suggested stakeholder engagement methods for each disadvantaged/vulnerable individual/group. The stakeholder categories, including the disadvantaged/vulnerable individual/groups and accordingly this SEP will be updated before the commencement of any project activity.

Table 4. Summary of Disadvantaged/Vulnerable Individuals/Groups and Suggested Stakeholder Engagement Methods

Project Component	Vulnerable Groups and Individuals	Features/Needs	Preferred method for information sharing and consultation	Additional Resource Support
Component 1	Persons with disabilities	Funding for training and communication strategy, including development of communication materials, to assist individuals with lack of accessibility, information, and special needs	Audio devices, accessible platforms, etc. special training needs	Special education coordinators, sign language translators/interpreters, psychologists and/or trained facilitators (for those who suffer disabilities following disasters)
	Elderly individuals	Lack of knowledge and inexperience about accessibility, online tools, services, and communication channels	Communication methods in accessible areas	Not necessary
	Immigrants, refugees, and non-native Turkish speakers	Those who have difficulties in communication due to language ability.	Translated documents, special translators, communication in accessible areas	Translators, and/or facilitators familiar with the target groups.
	Children, including orphaned children	Safe space, and engagement strategy that is tailored to understand their views and needs, including psychological support.	Facilitation with trained professionals, safe space facilities.	Safe space, facilitators

To include the views of vulnerable groups:

- Engagements will be carried out with regional organizations and NGOs representing the rights of persons with disabilities;
- Separate consultations will be conducted for elderly individuals and persons with disabilities (or people with additional accessibility needs), children immigrants, refugees and non-native Turkish speakers, and other disadvantaged/vulnerable groups who may be identified during the project;
- Information on the project will be provided face to face or by any other appropriate method specific to disadvantaged/vulnerable groups/individuals to be specified or specified (e.g., visually impaired alphabet, sign language, etc.);
- Consultations will be conducted at locations that provide access to disadvantaged/vulnerable groups/individuals; and
- Any written or printed materials related to the project to be distributed at project sites should be accessible to the disadvantaged/vulnerable groups/individuals of the project; the materials will also be prepared in culturally appropriate and easy to understand (non-technical) language.

8. Roles, Responsibilities and Resources for Stakeholder Engagement

The PIU in ILBANK will be responsible for the overall implementation of components 1 and 4a of the TERRP. ILBANK has prepared this SEP which will be used to guide ILBANK during the stakeholder engagement activities to be carried throughout the life of the Project.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of Social Expert in ILBANK PIU.

Adequate budget will be allocated for communication with stakeholders and grievance resolution mechanism. The budget is included in the project budget.

All contractors responsible for certain project activities will also be expected to apply the relevant provisions of the SEP. The Grievance Mechanism (GM) requirements will be regulated in tender documentation and contracts signed with contractors.

Under the PIU of the ILBANK Department of International Relations, a GM Team has been established and is composed of the Social Expert of the PIU and the Technical Group Manager. The GM Team is responsible for the implementation of ILBANK GM Policy².

Table 5. Responsible Parties for SEP Implementation

Responsible Party	Responsibilities
ILBANK PIU	<ul style="list-style-type: none"> • Incorporating all stakeholder engagement activities which will be undertaken by ILBANK into the environmental and social management systems • Developing an internal system to communicate the progress and results of stakeholder engagement to senior management and employees • Accelerating and monitoring the formation to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues. • Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues

² https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_gm_policy_1646748212.pdf

<p>Social Expert (PIU)</p>	<ul style="list-style-type: none"> • Planning and implementation of the SEP • Ensuring that stakeholder engagement is understood by PIU members and other stakeholders • Organizing / managing Stakeholder Engagement/Consultation Meetings and related events on public information sharing at project level • Coordinating interface and reporting to/from the World Bank on the implementation of the SEP • Updating the SEP periodically and in case of major Project changes • Monitoring and supporting the PIUs regarding communication with stakeholders and stakeholder engagement is at the maximum level • Acting as the focal point for the GM in the PIU • Keeping records and following up on complaints related to the project • Managing and coordinating the solution process of project-related complaints • Inspecting grievance records for relevant non-compliance issues or recurring issues with stakeholder engagement and other Project activities • Coordinating and monitoring GM contacts at the contractor level • Collecting project-related grievances from all different GM levels • Informing the PIU and management about the solution process • Preparing compiled GM reports related to the project • Monitoring the grievance records of contractors and the resolution process of the grievances and reporting them to the PIU in monthly progress reports • Maintaining contact with the PIU in order to respond to grievances/find solutions
<p>Environmental Expert (PIU)</p>	<ul style="list-style-type: none"> • Monitoring the progress of the project • Ensuring the successful delivery of all defined documents • Consolidating reports on overall SEP activities and project progress • Implementing social and environmental monitoring • Monitoring and reporting about the social and environmental issues specified in the relevant documents that are implemented throughout the Project • Supporting the Supervision Consultants and the sub-contractors on the implementation of E&S Documents (ESMPs etc.) • Supervising the implementation of the Project’s environmental and social instruments • Reviewing monitoring reports • Preparing semi-annual reports on the implementation of the environmental and social instruments • Alerting ILBANK management about accidents and incidents • Monitoring and reporting about the social and environmental issues specified in the relevant project specific E&S documents to be implemented throughout the Project.
<p>Procurement Specialist</p>	<ul style="list-style-type: none"> • Providing consultancy in tenders to be held within the scope of the Project. • Ensuring that the GM and the other environmental and social instruments are incorporated into the tender documents • Preparing English and Turkish copies of the tender documents
<p>Technical Specialist</p>	<ul style="list-style-type: none"> • Providing technical support to the project
<p>Governmental Authorities (both local and national level)</p>	<ul style="list-style-type: none"> • Providing inputs and feedback during the preparation and implementation phases of the SEP • Participating in relevant stakeholder engagement/consultation meetings
<p>Supervision Consultant</p>	<ul style="list-style-type: none"> • Ensuring that the project adheres to the methodology and other requirements which are mentioned in E&S Documents (ESMPs etc.) during implementation of sub-projects • Monitoring the contractors’ recording and resolution of grievances, and reporting these to PIU in their monthly progress reports

	<ul style="list-style-type: none">• Maintaining contact with the PIU GM Focal Point for the follow up of the grievances
--	---

9. Grievance Mechanism

9.1. Overview of Grievance Mechanism

ILBANK has established a transparent and comprehensive GM³ in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances and/or implements, and relevant mechanism will be in place during the course of the Project.

The operational flow of Grievance Mechanism for the stakeholders will be as follows:

1. **Dissemination of GM.** Communication and information tools will be prepared to disseminate information about the grievance mechanism. The project stakeholders will be informed regarding the available GM, its intake channels and operational procedures. The communication and informative tools to be developed are listed, but not limited to the followings:
 - a. Web page (ILBANK)
 - b. E-mail address (ILBANK)
 - c. Consultation meetings
 - d. Telephone (ILBANK)
2. **Submission of grievances and requests to ILBANK.** ILBANK includes several uptake channels for its GM.

Grievance/Suggestion Boxes	Grievance/Suggestion Boxes will be placed in the Department of International Relations of ILBANK and project sites. These boxes will be made available for all project workers and will be located at convenient places to enable the workers to submit their grievances or requests confidentially and/or anonymously.	
Phone	+90 312 508 79 79	
E-mail	bilguidb@ilbank.gov.tr	
Official Letter	ILBANK Department of International Relations, GM Team - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/Ankara	
Presidency Communication Center (CIMER) <i>The CIMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities</i>	Webpage	www.cimer.gov.tr
	Call Center	150
	Phone Number	+90 312 525 55 55
	Fax Number	+90 312 473 64 94
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the community relations desks at governorates, ministries and district governorates	
Foreigners Communication Center (YIMER) <i>The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for</i>	Webpage	www.yimer.gov.tr
	Call Center	157
	Phone Number	+90 312 157 11 22
	Fax Number	+90 312 920 06 09
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the community relations desks at governorates, ministries and district governorates	

³ https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_gm_policy_1646748212.pdf

<i>conveying their Project-related grievances and feedback directly to state authorities.</i>	Individual applications at the Republic of Türkiye General Directorate of Migration Management
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3. All the grievances received through the above channels will be collected at the ILBANK
4. The grievances received will be recorded into the database by GM Focal Points in the PIU
5. GM Focal Point who filed the grievance to confirm the receipt of the grievance by telephone and/or email within 2 days.
6. GM Focal Point prepares the draft response and submits it to the approval of the relevant Project Management (GM Team).
7. Following the response, the Grievance Form will be updated according to the outcome of the process and the complainant will receive the result within 10 working days. If the complaint is valid identifying and taking the required action within 15 working days. With the acceptance of the resolution by the applicant within 30 days, the case is closed. In case the applicant is not satisfied with the response and does not sign the Complaint Form, the GM Focal Point will organize a meeting with the PIU management, with the participation of the complainant, associated members of the PIU and the relevant construction contractor. The complainant will his/her concern with the management. The meeting will try to propose another solution to the complainant for the resolution that both parties can agree on.
8. If the complainant is still not satisfied with the outcome of the process, he/she may pursue their complaint through legal channels in the country.
9. A monitoring and evaluation system has been established. The monitoring is recorded in the monitoring and evaluation system.

The most important point in the grievance mechanism is to ensure that all requests are effectively received and recorded in a timely way, responded to and resolved within a predetermined timeline and on the basis of the content of the complaint. This has to be done by GM Focal Point, and proposed corrective/regulatory action has to be acceptable to both parties, or the complainant can pursue legal recourse. Additionally, the mechanism has to allow for anonymous complaints to be addressed and handled, including those related to sexual exploitation and abuse/sexual harassment (SEA/SH).

9.2. Workers' Grievance Mechanism

The workers (direct, contracted, including PIU staff) will be informed about the existence of grievance mechanisms, through notice boards, the presence of "suggestion/complaint boxes" and other means as needed. In addition, the workers' grievance mechanism will be described during the personnel induction trainings to be provided to all project workers. The workers' GM will allow submission of anonymous grievances and requests and these anonymous applications will also be addressed and handled.

The GM Team is established with expert/technical expert and technical group manager under the PIU of ILBANK Department of International Relations includes expert/technical expert and technical group manager.

The Ethics committee (EC) is responsible for investigating all sensitive complaints⁴ referred by the GM team or by any member of ILBANK PIU staff includes a senior manager, a manager and a staff representative under the Department of International Relations of ILBANK.

The workers grievance mechanism will have same operational flow as defined in *Section 9.1., Project Specific Grievance Mechanism.*

Below intake channels will be available for the project workers if they would like to submit a complaint or a request to ILBANK:

Grievance/Suggestion Boxes	Grievance/Suggestion Boxes will be placed in the Department of International Relations of ILBANK and project sites. These boxes will be made available for all project workers and will be located at convenient places to enable the workers to submit their grievances or requests confidentially and/or anonymously.	
Phone	+90 312 508 79 79	
E-mail	etikuidb@ilbank.gov.tr	
Official Letter	ILBANK Department of International Relations, GM Team - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/Ankara	
Presidency Communication Center (CIMER) <i>The CIMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities</i>	Webpage	www.cimer.gov.tr
	Call Center	150
	Phone Number	+90 312 525 55 55
	Fax Number	+90 312 473 64 94
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the community relations desks at governorates, ministries and district governorates	
Foreigners Communication Center (YIMER) <i>The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.</i>	Webpage	www.yimer.gov.tr
	Call Center	157
	Phone Number	+90 312 157 11 22
	Fax Number	+90 312 920 06 09
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the Republic of Türkiye General Directorate of Migration Management	

The worker complaints and requests will be classified based on their severity, frequency and more importantly sensitivity. Categories of complaints, descriptions and the responsible parties are presented below:

Worker Complaints

<u>Category</u>	<u>Description</u>	<u>Responsible Party</u>
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⁴ **Sensitive complaints** could include the following (not an exhaustive list): **1)** Sexual exploitation and/or any type of abuse by a staff member; **2)** Fraud and/or corruption by a staff member, such as involvement in bribery or misusing funds; **3)** Any action which constitutes a breach of ILBANK code of conduct including staff behavior.

Level 1	When an answer can be provided immediately and/or GM Team and Municipal/Contractor Community Engagement Officers are already working on a resolution	<ul style="list-style-type: none"> • GM Team
Level 2	Repeated, extensive and high-profile grievances that may jeopardize the Project or pose reputational risks	<ul style="list-style-type: none"> • GM Team • Ethics Committee • External Experts (when necessary)

9.3. Management of Sexual Exploitation and Abuse/Sexual Harassment issues

Although the risk from project activities is low, the grievance mechanism shall include handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints. The GM that will be in place for the project workers will also be used for addressing SEA/SH related issues and will have in place mechanisms for confidential reporting, with safe and ethical documenting of SEA/SH issues.

The project GM will include a channel to receive and address confidential complaints related to SEA/SH, with special measures in place. If an employee faces SEA/SH issue s/he can either apply to a higher-level superior or go directly to the police, as stipulated in the national referral system of the country for dealing such cases. The content and procedures of the project’s GM will also have a reporting line on such cases in regard to SEA/SH issues and will be handled under full confidentiality and with the consent of the survivor. If the ILBANK PIU will receive a SEA/SH related grievance, these grievances will be directed to national referral systems immediately and record that this has been directed, as set out in the GM Procedure of ILBANK. All details of the complainant of the sensitive case will be kept strictly confidential.

9.4. 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> . Project affected communities or individuals can also raise their grievances to the World Bank Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this

stage, WB would have an opportunity to respond to the complaints. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

10. Monitoring and Reporting

Monitoring and evaluation of the stakeholder engagement process is of utmost importance to ensure timely and effective decision making for Project implementation.

The ILBANK PIU will implement the monitoring activities throughout the lifetime of the Project. This SEP will be updated at least biannually and also upon receipt of feedbacks from stakeholders. Communication tools included in the SEP but not accepted by the stakeholders will also be updated with feedbacks. In addition, SEP will be updated in case of major changes that may arise in the scope of the Project.

A series of sample key performance indicators by Project Phase are presented in Table 6.

Table 6. Sample Key Performance Indicators by Project Phase

Project Phase	Indicator	Verification Method
Design and Planning	Stakeholder consultation meetings carried out to provide Project information and introduce project documents such as ESMPs and/or RPs	# of meetings conducted # and type of participants attended
Construction	Stakeholder consultation meetings carried out to provide Project information Awareness raising activities carried out throughout the life of the Project # of grievances received due to construction	# of meetings held # of people interacted Decrease in the # of grievances received due to construction
Operation	# of grievances received due to operation	Decrease in the # of grievances received due to operation

ANNEX 1. Grievance Submission Form

Türkiye Earthquake Recovery and Reconstruction Project				
COMPLAINT SUBMISSION FORM				
Person Filling the Form:	Date:			
Interview Agenda:	Reference No:			
1. INFORMATION ABOUT THE COMPLAINANT				
Name Surname <i>(Anonymous applications are also accepted, In case the complaint is submitted anonymously, the feedback regarding the measures taken/to be taken may not be communicated to the complainant. The result of the complaint will be made public on the ILBANK website) :</i>	How to receive the complaint			
Turkish ID Number:	Phone <input type="checkbox"/>			
Phone:	Face to face <input type="checkbox"/>			
Address:	Web-site/ E-Mail <input type="checkbox"/>			
E-Mail:	Other (Explain) <input type="checkbox"/>			
Stakeholder Type				
Public Institution <input type="checkbox"/>	Project Affected People <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Trade Association <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industry Associations <input type="checkbox"/>	Workers' Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
2. DETAILED INFORMATION ON THE COMPLAINT				
Description of the Complaint:				
Resolution method requested by the complainant				

Registered Person Name
Surname/Signature

Complainant Name Surname/Signature



MINISTRY OF HEALTH

TÜRKİYE

EARTHQUAKE RECOVERY & RECONSTRUCTION
PROJECT

Stakeholder Engagement Plan
(SEP) - Türkiye Earthquake
Recovery and Reconstruction

Project ID: P120040

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Abbreviations

AC	Appeals Committee
AFAD	Disaster and Emergency Management Presidency
AHM	Family Medicine Centers
Aoi	Area of Influence
CİMER	Turkish Presidential Communication Centre
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESIM	Unimpeded Health Communication Center
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
SuTP	Syrians under Temporary Protection
GM	Grievance Mechanism
GRS	Grievance Redress Service
İLBANK	İller Bankası A.Ş.
KPI	Key Performance Indicator
LMP	Labor Management Procedures
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoH	Ministry of Health
NGO	Non-governmental Organization
PAP	Project Affected People
PHC	Primary Health Care
PMSU	Project Management and Support Unit
Project	Türkiye Earthquake Recovery & Reconstruction Project
PRB	Patient Rights Board
PRU	Patient Rights Unit
SABİM	MoH Communication Center
SBN	Meeting Point at Health
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment

MoH – TÜRKİYE EARTHQUAKE RECOVERY & RECONSTRUCTION PROJECT

SEP Stakeholder Engagement Plan

WB World Bank

1 Introduction/ Project Description

This document is a Stakeholder Engagement Plan (SEP) that explains the stakeholder consultation and engagement process planned and to be implemented for the components 2 and 4b of the Türkiye Earthquake Recovery and Reconstruction Project (TERRP or Project) and prepared by the Ministry of Health.

On 6 February 2023 in Kahramanmaraş, a 7.8 magnitude earthquake at 04:17 (local time) and a 7.5 magnitude earthquake at 13:24 (local time) were occurred. The earthquakes have been recorded as the strongest to strike Türkiye since 1939 and the deadliest since the Izmit earthquake in August 1999.

These earthquakes and the aftershocks impacted approximately 13.4 million Turkish citizens and 1.8 million Syrians under Temporary Protection (SuTP), mainly in the provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kilis, Malatya, Osmaniye, Elazığ, Sivas and Şanlıurfa.

The earthquakes also caused extensive damage to critical infrastructure in the region, including hospitals, airports, ports, roads, railways, bridges, natural gas and electricity pipelines, and communications infrastructure.

The health sector is among those most affected by the earthquake due to damage to health facilities.

Prior to the earthquake, the health sector in the ten earthquake provinces was well-developed, comprising 12.5% of hospitals (116 out of 927 hospitals) and 17.5% of primary health care facilities (2,454 out of 14,031 facilities) in Türkiye.

In the region, the number of hospital beds per 10,000 inhabitants (32.3) was higher than the national rate of 31.3 beds per 10,000 inhabitants.

Affected provinces also provided 17.5% (2,454) of primary health care (PHC) centers in the country and a strong PHC system through a network of Family Medicine centers (AHMs) (14,031). AHM preventive care, reproductive health provides primary health care services, including maternal and childcare, immunization, and screening and treatment of chronic conditions. Healthy Life Centers lifestyle consultancy and supervision complements the family medicine model by providing people-centered/personalized services through screening and prevention of priority non-communicable diseases.

Due to the earthquake, the health sector suffered significant damage of approximately 4.3 billion USD.

Including public, private and university hospitals, approximately 31 percent of hospitals (42 out of 136 buildings) were severely damaged, and 69 percent of hospital buildings (94 out of 136 buildings) were slightly damaged. Damage to hospital buildings is estimated at US\$3.1 billion.

Similarly, primary health care facilities, public health laboratories, imaging centers and vaccine depots in the earthquake area were also severely damaged.

Damage to health facilities has hampered the ability of the sector to provide services at a time when communities affected by the earthquake most need it. This includes services not only for patients injured in the earthquake, but also for patients with chronic diseases such as diabetes, lung and cardiovascular disease, and those requiring advanced treatment such as chemotherapy and dialysis.

Disruption of services has increased barriers to access to routine care such as vaccination and maternal and child health services. In addition to the depletion of medical supplies and drugs needed for those with existing health problems, there has also been a very high increase in the demand for disability care and mental health services after the earthquake.

In addition to these disruptions, service provision in the region is seriously hampered by the health workforce shortages.

Health workers lost their lives or were injured in earthquakes, or health workers could not continue to work because their homes were destroyed and their families suffered losses. Improving the working conditions of the currently serving health workers also stands out as a priority issue in the earthquake zone. Most of the healthcare workers are currently staying in tents, working under difficult conditions with extreme fatigue.

After the earthquake, approximately 3.3 million people migrated from the earthquake area and approximately two million people live in tent camps and container settlements. Additional resources are needed to meet the increase in the demand for health services in cities such as Mersin, Adana, Antalya, Konya, Samsun, Ankara, Eskişehir and Van, which received immigration in this process.

2 About the Türkiye Earthquake Recovery and Reconstruction Project

The Project will support the Government of Türkiye's recovery efforts to restore essential services and provide resilient rural housing in areas affected by the February 2023 earthquakes. It will support the provision of temporary facilities and equipment, rehabilitation/structural strengthening and resilient reconstruction of damaged infrastructure and buildings required for the restoration and continued operation of essential services, including health, water, sanitation, and emergency services. It will also finance the resilient reconstruction of damaged rural houses and associated basic infrastructure in villages. Investments under the Project will be made using a build-back-better approach that promotes resilience to disaster and climate, sustainability, and inclusion.

Eligible provinces are the eleven provinces that sustained the greatest damages in the February 2023 earthquakes; however, provinces nationally that received a high influx of displaced population will also be eligible for support under the health component. The eleven provinces declared as disaster zones in February 2023 are Adana, Adıyaman, Diyarbakır, Elazığ, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, and Şanlıurfa.

The Project will be implemented through four components.

Component 1 Restoration of Municipal Infrastructure and Services. The responsibility for overall management and implementation of this component will lie with ILBANK. This component will finance civil works (including demolition as applicable), goods, consultancy, and non-consulting services needed to restore access to critical municipal services of affected communities while enhancing disaster and climate resilience.

Subcomponent 1.1: Resilient rehabilitation and reconstruction of municipal infrastructure. This subcomponent will finance rehabilitation and reconstruction of existing municipal water, sanitation, wastewater, and drainage services damaged by the earthquakes. Eligible activities will include the repair and reconstruction of damaged water and sewage networks, water treatment plants, wastewater treatment plants, stormwater drainage, etc. to be more disaster and climate resilient and, as such, be better adapted for the climate change and/or would consider introduction of climate-smart/nature-based technologies and solutions contributing to climate change mitigation. The subcomponent may also support the installation of temporary water and sanitation facilities for container cities, such as package wastewater treatment plants, solar thermal hot water collectors, portable rainwater storages, etc., as needed. This subcomponent will also finance rehabilitation and resilient reconstruction of municipal roads, bridges, underpasses, and allied infrastructure that have been damaged by the earthquakes.

Subcomponent 1.2: Resilient recovery of critical municipal service facilities. This subcomponent will finance the rehabilitation and reconstruction of municipal fire station buildings and purchase of equipment required to restore the provision of firefighting, emergency response, and other critical municipal services. Eligible activities will include inter alia: (a) installation of prefabricated facilities to provide critical municipal fire and emergency services during transition periods and ensure continuity of services, as needed; (b) repair and strengthening of lightly damaged municipal fire stations; (c) in-situ resilient reconstruction of destroyed, heavily and moderately damaged municipal fire stations or reconstruction of such facilities in new locations as deemed acceptable according to the World Bank's ESF; and (d) the acquisition of emergency response and municipal services equipment and vehicles (e.g. firefighting and rescue vehicles and equipment, solid waste collection vehicles, buses, street sweeping vehicles, etc.) to restore municipal capacity for essential service provision. These activities will also contribute to strengthening the capacity and preparedness of the affected municipalities to respond to future disasters, including climate change-imposed challenges and the expected growing impact of extreme weather and natural hazards.

Component 2: Restoration of Health Services. The responsibility for overall management and implementation of Component lies with the MoH through the existing Project Management Support Unit (PMSU). This component will support activities to ensure continuity of access to health services for the affected population in the immediate and short-term. This will include establishing and ensuring the operation of prefabricated primary health care (PHC) facilities and equipping field emergency hospitals, establishing a network of field and mobile PHC and diagnostic services, restoring depleted medical supplies, improving access to vaccination, supporting access to disability support, and supporting sanitation measures to ensure clean water and prevent infectious diseases.

Subcomponent 2.1 – Ensuring continuity of primary-level and hospital-level health services. This subcomponent will support the establishment of a network of fixed prefabricated family health centers supported by mobile PHC units. The prefabricated facilities are needed to replace the collapsed, heavily, and moderately damaged primary health care buildings (Family Medicine Centers) in the earthquake region until permanent PHC facilities can be reconstructed. The mobile units will also allow health care providers to provide services to displaced population in tent camps, container cities, refugee shelters and scattered villages in rural areas. In line with MoH's interim strategy to restore PHC services, the subcomponent will finance: (i) the installation of 350 prefabricated, fully equipped family health centers with an average of 3-4 family medicine units in each, for primary health care service delivery in the region; and (ii) procurement of 250 mobile health clinics to reach out to the different temporary settlements with large, displaced population and rural regions. This subcomponent will also support the operation of eleven prefabricated emergency hospitals through the procurement of furnishings and medical equipment.

Subcomponent 2.2 – Providing mobile pharmaceutical and diagnostic services. This subcomponent will establish a network of mobile diagnostic services to support the field emergency hospitals and prefabricated PHC facilities. Activities will include the purchase of: (i) vehicles equipped with mobile imaging equipment, (ii) mobile public health laboratories for microbiology and water analysis, (iii) mobile computerized tomography devices, (iv) mobile digital X-ray and ultrasound devices, (v) home health care services vehicles and related kits, (vi) ambulances and fully equipped medical all-terrain vehicles, and (vii) mobile command control vehicles.

Subcomponent 2.3 – Supporting access to vaccination, disability services, and medical equipment. This subcomponent will finance activities to restore MoH's capacity in vaccination, address the needs of people disabled due to the earthquakes, and curb the spread of infectious diseases. Activities will include: (i) the replacement of damaged provincial and district vaccine warehouses with prefabricated and light steel construction vaccine storage containers to be located in the major cities of Hatay, Malatya, Kahramanmaras, Adiyaman and Adana that will service as regional vaccine warehouses for the earthquake region; (ii) provision of vaccine transport vehicles to ensure timely distribution of vaccines from the regional warehouses to settlements across the earthquake region, including container cities, dispersed villages in rural areas, and refugee shelter camps; (iii) provision of equipment for disability services, including inter alia, microprocessor prosthesis, orthotics and prosthesis, and battery powered wheelchairs; (iv) provision of equipment and capacity building for physical therapy and rehabilitation centers in earthquake-affected provinces; and (v) provision of essential medical supplies such as biocidal products and rapid test kits.

Component 3– Emergency Housing Support and Recovery. The responsibility for overall management and implementation of Component 3 will lie with MoEUCC's General Directorate for Construction Affairs (GDCA), in close coordination with AFAD, the Strategy and Budget Presidency (SBP), the MoTF, and other relevant directorates of MoEUCC.

Subcomponent 3.1 – Rural housing reconstruction. This subcomponent will finance civil works, consultancy, and non-consulting services to support the recovery of the earthquakes-affected rural villages under the government's existing post-disaster housing reconstruction program. For resilient

reconstruction of rural houses assessed as collapsed, severely or moderately damaged, preference will be given for in-situ reconstruction to the extent possible under the Project. Civil works for infrastructure will support the repair of damaged municipal infrastructure/engineering networks where housing is reconstructed in situ and the new construction of such infrastructure where housing is being relocated to new sites. The subcomponent will also provide technical assistance to strengthen the current post-disaster rural housing program.

Subcomponent 3.2 – Resilient recovery foundations and inclusive post-disaster housing support. This subcomponent will finance technical assistance and advisory services to AFAD’s General Directorate of Housing and Construction Works, and MoEUCC’s General Directorate of Construction Affairs to support planning for medium/longer term resilient reconstruction and improve post-disaster housing programs for future disasters.

Component 4 – Project Management, Monitoring & Evaluation. This component will finance consultant and non-consulting services, goods, training, and operating costs for supporting the Implementing Agencies in project management and implementation activities under the Project, including for, but not limited to, monitoring and evaluation, reporting, procurement, financial management, environmental and social management, grievance redress mechanism, and project communication and outreach.

3 Aim and Scope of Subcomponents to be implemented by the MoH

According to the current situation described above, the components 2 and 4b of the Project is planned according to the following criteria, focusing on restoring access to services and maintaining health care.

- (i) Supporting the operation of five prefabricated field hospitals through the purchase of furniture and medical equipment;
- (ii) Ensuring access to primary health care and maintaining health care through a network of prefabricated fixed health centers supported by mobile PHC units
- (iii) Restoring the vaccination capacity of the Ministry of Health,
- (iv) Connecting established field hospitals and primary health care facilities through a network of mobile pharmaceutical and diagnostic services;
- (v) Supporting access to disability services, including microprocessor prosthetics, orthoses and prostheses, battery powered wheelchairs, FTR capacity development in the 4 major damaged provinces of Hatay, Maraş, Gaziantep and Diyarbakır,
- (vi) Purchasing essential medical supplies to reduce the spread of infections by speeding up the distribution of medical supplies.

These activities will be implemented for the Hatay, Malatya, Kahramanmaraş, Adana, Adıyaman, Gaziantep, Osmaniye, Diyarbakır, Şanlıurfa, Kilis, Elazığ, Sivas provinces which have been affected by the earthquake and, for the provinces of Antalya, Ankara, İstanbul, İzmir, Mersin where the health service demands have highly increased, due to the received migration from the earthquake impacted provinces.

4 Regulations and Requirements

National requirements

The Constitution of The Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

Health, the Environment and Housing

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality

and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organisations, which qualify as public institutions.

Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

Expropriation Law

Another law related to the involvement of stakeholders in the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorization, procedure, reason, and the subject of the action.

World Bank Requirements

The World Bank Environmental and Social Standard 10 (ESS 10) defines the requirements of the "Stakeholder Engagement and Information Disclosure" in accordance with the WB approach.

World Bank's Environmental and Social Framework (ESF) recognizes, " the importance of open and transparent engagement between the Borrower (MoH) and project stakeholders as an essential element of good international practice."

The requirements set out by ESS10 are as follow:

- 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).

WB ESS 10 highlights the importance of open and transparent participation between the Borrower and Project stakeholders as a key element of international good practice. Therefore, ESS10 defines an effective stakeholder engagement process as one that makes significant contributions to the environmental and social sustainability of the Project, its acceptance, and successful project design and implementation.

In line with this approach, stakeholder engagement process according to ESS10 should cover the following topics;

- (i) identification and analysis of stakeholders,
- (ii) planning how the interaction with stakeholders will take place,
- (iii) disclosure of information,
- (iv) consultation with stakeholders,
- (v) handle and respond to complaints,
- (vi) reporting to stakeholders.

As detailed in ESS10, as part of the Borrower's environmental and social assessment, 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 not why.

However, according to ESS10, the Borrower is required to respond in a timely manner to stakeholders' concerns and complaints regarding the environmental and social performance of the project. The Borrower shall establish and implement a grievance mechanism to resolve such concerns and grievances.

The grievance mechanism should be accessible and inclusive, commensurate with the potential risks and impacts of the project.

5 Brief Summary of Previous Stakeholder Engagement Activities

This SEP was developed during the preliminary phase of the Project. In this early phase of the preliminary work, institutional consultations, which played a role in the development of the Project, were held within the scope of stakeholder consultations.

For the current situation analysis and needs analysis for the Türkiye Earthquake Recovery and Reconstruction Project following engagement activities were held:

- weekly face-to-face and online meetings were conducted at the level of director, general manager and department head of the General Directorate of Public Hospitals, General Directorate of Public Health, General Directorate of Emergency Health Services, which are in the MoH,
- weekly face-to-face and online meetings were conducted at the level of expertise with the participation of social, environmental, purchasing, finance experts and consultants from the General Directorate of Public Hospitals, General Directorate of Public Health, General Directorate of Emergency Health Services, and
- online correspondence and meetings were held with the provincial health directorates, hospital administrations and public health units of the earthquake zone provinces.

The main focus of the stakeholder meetings carried out are listed below;

- to understand the current situation in the earthquake region,
- to understand and identify the losses in the health institutions and the health sector in the earthquake region,
- to identify and prioritize the urgent needs in health sector at national, regional and provincial levels,
- to carry out provincial level need assessments and categorizations,
- to identify the opportunities and constraints based on the needs and urgent actions those can be financed within the scope of the Project,
- to determine the provinces outside the earthquake zone but indirectly affected by the earthquake (migration, population influx, economic losses, etc.) and to assess the potential health sector problems on these provinces, and
- to determine the urgent needs of the provinces that received population from the earthquake region and to assess their preliminary needs to be financed within the scope of the Project.

6 Stakeholder Identification and Analysis

The first step of defining the stakeholders is the first step of the stakeholder engagement process. Therefore, in order to determine the most appropriate consultation methods, stakeholders are identified and classified.

The identification and analysis of the stakeholders should be performed as early as possible in the project life cycle, taking into account the dynamics between stakeholders and the risks and opportunities of their involvement in the Project, and should:

- Categorize stakeholders in accordance with their level of impact and interest in the project/sub-projects;
- Present how each stakeholder group (vulnerable groups, individuals, organizations, government institutions, etc.) will be affected by the project and how will influence the Project – directly or indirectly; through taking into account:
 - the area of influence; geographical location where anticipated impacts (both positive and negative) will occur, and therefore the localities within which people and businesses could be affected, and
 - the nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues.

Project stakeholders are defined as individuals, groups or other entities who;

- I. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’) and,
- II. may have an interest in the Project (‘interested parties’). Interested parties include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

It is the first step of defining the stakeholders in the project process and determining the consultation methods with the identified stakeholders and then implementing them.

At this stage, the following steps are applied.

- Defining the area of influence
- Identification of stakeholders with mapping
- Classification of stakeholders according to their level of influence or interest,
- Identification of stakeholder representatives,
- Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent),
- Determining the appropriate consultation tools for the social, cultural and economic conditions of the community representatives and stakeholders,
- Identification of stakeholders identified as vulnerable groups,
- Identification of vulnerable group contact persons/representatives,
- Determination of consultation methods and tools with vulnerable groups
- Determining the project stakeholder engagement process program,
- Developing the Project Grievance Mechanism Procedure

The method and approach used in implementing these stages are detailed below.

7 Approach and Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are encouraged to be involved in the consultation process, to the extent the current circumstances permit. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly and the cultural sensitivities of diverse ethnic groups.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (Aoi) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups**⁵ – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status⁶, and that may require special engagement efforts to ensure their equal

5 <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=111&zoom=80> : “Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable “.

6 Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

representation in the consultation and decision-making process associated with the project.

8 Area of Influence

IFC Guidance Note 1⁷ describes the AoI as follows;

Where the project involves specifically identified physical elements, aspects, and facilities that are likely to generate impacts, environmental and social risks, and impacts will be identified in the context of the project's area of influence.

This area of influence encompasses, as appropriate:

The area likely to be affected by:

- i. The project and the client's activities and facilities that are directly owned, operated, or managed (including by contractors) and that are a component of the project;
- i. Impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or
- ii. Indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.

Therefore, in the light of the above explanations, the Project Area of Influence is defined in the following order;

- Directly earthquake impacted provinces which area is defined as the foot-print of the Project,
- Migration affected provinces which are both foot-print and likely to be affected area and,
- Turkiye.

The AoI of the Project is presented in the figure below.

⁷ Assessment and Management of Environmental and Social Risks and Impacts

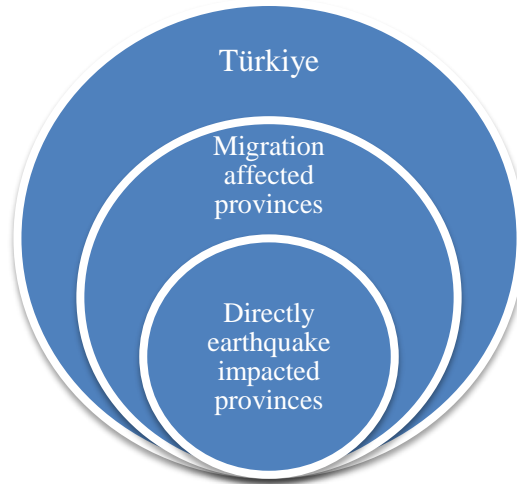


Figure 5-1 Project Aol

Project area of influence footprint includes the directly earthquake impacted provinces which are Hatay, Malatya, Kahramanmaraş, Adana, Adıyaman, Gaziantep, Osmaniye, Diyarbakır, Şanlıurfa, Kilis, Elazığ, Sivas.

Migration affected provinces where the health service demands have highly increased, due to the received migration from the earthquake impacted provinces, which are Ankara, Mersin, İstanbul, İzmir, Antalya. Project activities and supports will be extended to these provinces as well.

It is also expected that the improvements and health sector supports arising from the Project activities in the project provinces will positively affect the health service delivery, health conditions and working conditions throughout Türkiye in the future.

When all areas of the project that are likely to have an impact are evaluated, Türkiye, including other interested parties, is considered as the last circle in the indirect influence area.

9 Stakeholders

Affected Parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups are defined within this category:

- Earthquake impacted people living in the earthquake provinces,
- Earthquake impacted people migrated from the earthquake provinces,
- Health institutions in earthquake provinces including;
 - o state hospitals in the earthquake provinces
 - o family health centers in the earthquake provinces
 - o public health centers in the earthquake provinces

- centers operating in the earthquake provinces, such as laboratories, etc.
- physical therapy institutions in the earthquake provinces
- Pharmacies in the earthquake provinces
- State hospitals in the immigration cities (Ankara, Mersin, İzmir, İstanbul, Antalya)
- Public/private health care workers (doctors, nurses, public health inspectors, midwives, laboratory technicians/staff,) and emergency personnel
- Staff at medical and testing facilities, pharmacies and public health agencies
- Ministry of Health, Ministry of Health/ Emergency Health Services General Directorate,
- Ministry of Health, General Directorate of Public Hospitals,
- Ministry of Health, General Directorate of Public Health,
- Disaster and Emergency Management Presidency (AFAD)
- Municipalities of the earthquake impacted provinces
- Governorships of the earthquake impacted provinces
- Provincial Directorates of MoH
- Provincial Directorates of AFAD
- Provincial Directorates of Environment, Urbanization and Climate Change
- Service or Good Providers of the Project
- Local businesses
- NGO's, health organizations/ associations working in the earthquake provinces

Other Interested Parties

The Project stakeholders also include parties other than the directly affected communities, including:

- Community based organizations, national civil society groups and NGOs, etc.
- Goods and service providers involved in the project's wider supply chain
- Ministry of Environment, Urbanization and Climate Change (MoEUCC)
- Provincial Directorates of Environment, Urbanization and Climate Change
- Ministry of Interior
- İller Bankası A.Ş. (İLBANK)
- Union of Municipalities of Türkiye
- Communities living in the neighborhood provinces
- Family health centers in the immigration cities
- Public health centers in the immigration cities
- Centers operating in the immigration cities
- Physical therapy institutions in the immigration cities
- Media including social media

- National and international health organizations/ associations (e.g. the Turkish Medical Association (TTB), TTB Specialist Associations, Public Health Experts Association, Turkish Clinical Microbiology and Infectious Diseases Association, Turkish Thoracic Society, and Turkish Intensive Care Association, Red Crescent Society, WHO, Global Fund)
- Other interested national NGOs
- Other donor organizations (ADB, EBRD, CEB, IsDB, KfW, USAID, and GIZ),
- Interested international NGOs, Diplomatic mission and UN agencies (especially UNICEF, WHO), EU, bilateral agencies and others
- Academics

Vulnerable/Disadvantaged Individuals or Groups

WB ESS10 defines vulnerable/disadvantaged individuals/groups as; "*disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits*"⁸.

Based on this definition, WB ESS10 emphasizes the importance of ensuring the meaningful participation of vulnerable groups in consultation processes; "Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so"⁹.

Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the scope of the Project, the vulnerable or disadvantaged groups include but are not limited to the following:

- Individuals with disability, including those with new disabilities due to disasters.
- Elderly individuals
- Chronic patients
- Immigrants, refugees, and non-native Turkish speakers
- Poor households
- All earthquake victims who lost their relatives and suffered material and moral damage in the earthquake and Post-Traumatic Mental Disorder (PTSD)
- Pregnant women, infants and children
- Refugees, migrants, citizens with limited Turkish language abilities
- the unemployed and homeless
- Women-headed households and/or single mothers with underage children
- Extended low-income families

⁸ <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=111&zoom=80>

⁹ <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=111&zoom=80>

- Patients in health-care facilities, including those in temporary locations.

Vulnerable/disadvantaged individuals/groups in the population will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement to be undertaken by the project is provided in the following sections.

Mapping of the Project Stakeholders

Table 5-1 Mapping of the Stakeholder Groups

Stakeholder Groups	Stakeholders	Affected Parties		Other Interested Parties
		Direct Stakeholders	Indirect Stakeholders	
Project Affected People (PAPs)	<ul style="list-style-type: none"> • Earthquake impacted people living in the earthquake provinces 	x		
	<ul style="list-style-type: none"> • Earthquake impacted people migrated from the earthquake provinces 	x		
	<ul style="list-style-type: none"> • Communities living in the neighborhood provinces 			x
Governmental bodies	<ul style="list-style-type: none"> • Ministry of Health, Ministry of Health/ Emergency Health Services General Directorate 	x		
	<ul style="list-style-type: none"> • Ministry of Health, General Directorate of Public Hospitals 	x		
	<ul style="list-style-type: none"> • Ministry of Health, General Directorate of Public Health 	x		
	<ul style="list-style-type: none"> • AFAD 			x
	<ul style="list-style-type: none"> • MoEUCC 			x
	<ul style="list-style-type: none"> • Ministry of Interior 	x		
	<ul style="list-style-type: none"> • ILBANK 			x
Local governmental bodies	<ul style="list-style-type: none"> • Governorships of the earthquake impacted provinces 	x		
	<ul style="list-style-type: none"> • Provincial Directorates of MoH 	x		
	<ul style="list-style-type: none"> • Provincial Directorates of AFAD 			x
	<ul style="list-style-type: none"> • Provincial Directorates of Environment, Urbanization and Climate Change 			x
Municipalities	<ul style="list-style-type: none"> • Municipalities of the earthquake impacted provinces 	x		
	<ul style="list-style-type: none"> • Union of Municipalities of Türkiye 			x
Health institutions	<ul style="list-style-type: none"> • State hospitals in the earthquake zone 	x		
	<ul style="list-style-type: none"> • Family health centers in the earthquake area 			

	<ul style="list-style-type: none"> Public health centers in the earthquake area Centers operating in the earthquake zone, such as laboratories, etc. Physical therapy institutions in the earthquake area Pharmacies in the earthquake area 			
	<ul style="list-style-type: none"> State hospitals in the immigration cities (Ankara, Mersin, İzmir, İstanbul, Antalya) 	x		
	<ul style="list-style-type: none"> Family health centers in the immigration cities Public health centers in the immigration cities Centers operating in the immigration cities Physical therapy institutions in the immigration cities 			x
Healthcare workers in the earthquake provinces	<ul style="list-style-type: none"> Public/ private health care workers, Doctors, Nurses, Midwives Public Health workers, Pharmacist 	x		
NGO's and organizations	<ul style="list-style-type: none"> National and international health organizations/ associations: Turkish Medical Association, TTB, Public Health Experts Association, Turkish Clinical Microbiology Infectious Diseases Association, Turkish Thoracic Society, Turkish Intensive Care Association, Interested national NGOs 			x
	<ul style="list-style-type: none"> NGO's, health organizations/ associations working in the earthquake provinces 	x		
	<ul style="list-style-type: none"> Red Crescent Society, Global Fund Diplomatic mission and UN agencies (UNICEF, WHO), EU Interested international NGOs, 			x

Local sector	<ul style="list-style-type: none"> • Service or Good Providers 		x	
	<ul style="list-style-type: none"> • Local businesses 			x
	<ul style="list-style-type: none"> • Chamber of Arts and Craftsman 			x
Academics	<ul style="list-style-type: none"> • Universities • Institutes 			x
Other donor organizations	<ul style="list-style-type: none"> • ADB, • EBRD, • CEB, • IsDB, • KfW, • USAID, • GIZ 			x
Vulnerable/Disadvantaged Individuals/Groups	<ul style="list-style-type: none"> • Individuals with disability • Elderly individuals • Chronic patients • Immigrants, refugees and non-native Turkish speakers • Poor households • All earthquake victims who lost their relatives and suffered material and moral damage in the earthquake and PTSD. • Pregnant women, infants and children • Refugees, migrants, citizens with limited Turkish language abilities • The unemployed and homeless • Women-headed households and/or single mothers with underage-children; • Extended low-income families • Patients at health care facilities, including in temporary locations. 	x		

10 Stakeholder Engagement Program

Purpose and timing of stakeholder engagement program

Due to the urgency of the project, the consultations during the project preparation phase were conducted with the officials of the relevant ministries/state units and provincial-district directorates, hospital administrators and relevant persons from other institutions working in the health sector.

Consultations during this preliminary phase are described in Section 5 Introduction/ Project Description.

This SEP will be consulted before being finalized. The Environmental and Social Management Framework (ESMF), Environmental and Social Commitment Plan (ESCP), Environmental and Social Management Plan (ESMP) and Request, Suggestion and Complaint Forms to be developed for the Project will be announced on the PMSU's official website¹⁰. The SEP will be continuously (at least biannually) updated as needed throughout the project implementation period.

Information disclosure

Stakeholder engagement during project preparation and implementation phases will be carried out in compliance with the national legislation and WB Environmental and Social Standard 10 – Stakeholder Engagement and Information Disclosure (2018).

MoH will make sure that all affected parties, including internal and external stakeholders such as health care workers, organizations, NGOs, local governmental agencies and etc. will be informed about the Project and will be involved in the process of identifying the important issues of the Project.

Stakeholder engagement will continue throughout preparation, implementation and operation phases. Key stakeholders will be kept informed about the Project progress, have the opportunity to feedback on the effectiveness of mitigation and enhancement measures and to raise any concerns or grievances (but not limited to) the following:

1. The impacts that have been identified as a result of the Project
2. The impacts and mitigation or enhancement measures that are being implemented;
3. The implementation schedule;
4. Roles and responsibilities;
5. Monitoring and management measures; and
6. Information on the grievance mechanism for the Project.

¹⁰ For Turkish <https://pydb.saglik.gov.tr/>, for English https://pydb.saglik.gov.tr/?_Dil=2

To ensure effective stakeholder engagement, the SEP will be reviewed monthly by the authorized person working in PSMU during the life of the Project.

This section also presents the type of information to be shared with each different stakeholder groups during the stakeholder consultation process, and the types of methods to be used for information sharing with each stakeholder group.

Various engagement techniques will be used to interact and consult with stakeholders as well as to gather and communicate information from stakeholders.

The level of influence, in addition to the needs and concerns of the stakeholders, will determine the basis of the communication tools and methods chosen to interact with particular groups.

Throughout the project, the language of communication with stakeholders will be Turkish. However, different languages will be taken into account if necessary, in order to increase the effectiveness of engagement activities and ensure the participation of all stakeholder groups.

Engagement activities will continue to ensure meaningful participation, and timely and effective information will be provided to stakeholders in line with this purpose.

The tools and methods defined for stakeholder engagement have been diversified and expanded to implement sustainable stakeholder engagement that is appropriate to the cultural, social and economic conditions of all stakeholders.

Consultations, information activities and meetings to be held with stakeholder groups will be carried out with the weighted use of methods suitable for the emergency situation of the Project and current conditions.

The methods and tools of stakeholder engagement of the project are described below.

Methods and Tools of Stakeholder Engagement

MoH PMSU Website: The website will be one of the active tools in the stakeholder engagement process throughout the life of the Project.

MoH PMSU Website: <https://pydb.saglik.gov.tr>

E-mail address to external stakeholders: Project authorized persons can reach stakeholders via e-mail addresses in order to reach stakeholders and/or provide feedback.

E-mail: trhealth@saglik.gov.tr

Online meetings: Consultation and information sharing meetings will be held with key stakeholders.

Online interviews can also be used for the application of research techniques such as in-depth interviews, surveys, focus group meetings to monitor and evaluate, obtain information and collect data, if needed. Records can be taken at these meetings, if deemed necessary and with the consent of all stakeholders.

Grievance Mechanism: The grievance mechanism, which will include the operation of the process where the notifications, records, information and complaints of the stakeholders will be kept, the complaints will be evaluated and monitored and the results will be communicated to the stakeholders with the feedbacks, is an important stakeholder engagement management tool and method to be used throughout the project.

Alternative Tools: The following tools and methods are planned to be used simultaneously in order to ensure stakeholder participation of vulnerable/disadvantaged individuals/groups such as illiterate population, people with disabilities and refugee groups who do not have access to the internet, smart phones, social media or e-mail.

Letter/post: Project brochures (including project information, grievance mechanism, etc.), postings, reports or announcements can be sent to disadvantaged or vulnerable groups or individuals who do not have access to the internet, smartphone, social media or e-mail.

Public boards: Announcements and information posters of communication channels related to the Project can be used in common public areas in surrounding settlements, headman offices, municipalities, Provincial directorates of the Ministry of Health, when necessary.

Posters/brochures/flyers: Brochures/flyers with communication channels, announcements and information about the Project can be posted in the common public areas in the surrounding settlements, headman's offices, municipalities, provincial directorates, when necessary.

Local media: Announcements will be made in the printed and visual media at the stages and situations required by the Project.

Stakeholder visits: Face-to-face meetings will be held with stakeholders during the project process, and stakeholder visits will be made when necessary for monitoring and evaluation processes.

Consultation meetings: Consultation meetings can be held during the project process when needed and when stakeholders demand. Meetings will be held in places and places that will facilitate the participation of stakeholders. Details such as the time, date and place of the consultation meetings will be planned in line with the opinions and suggestions of the stakeholders.

Stakeholder Engagement Program

Information sharing and consultation issues, participation methods and implementation tools foreseen for the stakeholders of the project are presented in the Table 10-1 given below.

Table 10-1 Stakeholder Engagement Program

Project stage	Topic of consultation / message	Method / tool	Target stakeholders	Responsibilities
Project preparation	Project design and activities concerning Component 3,	<ul style="list-style-type: none"> E-mail to external stakeholders Official correspondences 	Affected parties:	PMSU

Project stage	Topic of consultation / message	Method / tool	Target stakeholders	Responsibilities
	<p>including information on how to access project support (i.e., disability services, therapy, pharmaceutical and diagnostic services, counseling and psycho-social support, etc.), measures to promote universal design, etc.</p> <p>Preparation of the E&S instruments for the Project:</p> <ul style="list-style-type: none"> • SEP • Labor Management Procedures (LMP) • Grievance mechanism (GM) • ESMF • ESCP 	<ul style="list-style-type: none"> • Online meetings • Online interviews • Stakeholder visits • Consultation meetings 	<ul style="list-style-type: none"> • Governmental bodies • Local Governmental bodies • Health institutions 	
	<p>Disclosure of the project information along with the E&S safeguard plans instruments</p> <ul style="list-style-type: none"> • SEP • LMP • GM • ESMF • ESMP 	<ul style="list-style-type: none"> • MoH PMSU Website • E-mail to external stakeholders • Online meetings • Online interviews • Grievance Mechanism • Letter/post • Public boards • Posters/brochures/flyers • Local media • Stakeholder visits • Consultation meetings 	<ul style="list-style-type: none"> • All stakeholders 	PMSU
Implementation	<ul style="list-style-type: none"> • SEP • Grievance mechanism • Health and safety of public and health workers addressed in LMP and in worker's GM • Delivery of health services at both primary and 	<ul style="list-style-type: none"> • MoH PMSU Website • E-mail to external stakeholders • Online meetings • Online interviews • Grievance Mechanism • Letter/post • Public boards • Posters/brochures/flyers • Local media • Stakeholder visits • Consultation meetings 	<p>Affected parties of;</p> <ul style="list-style-type: none"> • Governmental bodies • Local Governmental bodies • Health institutions • Healthcare workers 	Environment and Social Specialist of the PMSU

Project stage	Topic of consultation / message	Method / tool	Target stakeholders	Responsibilities
	<p>hospital levels, as well as supporting services such as vaccines, disability services, and equipment and stakeholders' perceptions on access to and delivery of such services.</p> <ul style="list-style-type: none"> • Environmental concerns under Waste Management Plan for Hospitals • ESMF and Project related occupational health and safety arrangements • National Emergency Plan 		<ul style="list-style-type: none"> • Vulnerable/disadvantaged individuals/groups • Municipalities • Local sector • NGOs 	

Proposed strategy/differentiated measures to include the views of and encourage participation by vulnerable/disadvantaged groups/individuals

It is of particular importance to understand whether project impacts disproportionately affect disadvantaged/vulnerable individuals/groups who are often unable to raise their concerns or understand the impacts of a project. Awareness raising and stakeholder engagement activities the project should be implemented regarding taking into account the special constraints and cultural sensitivities of these groups and individuals so that they fully understand the project activities and benefits. Interaction with vulnerable groups and individuals often requires special measures and assistance to ensure that these groups and individuals are well aware of the overall process and their contribution to the process is in balance with other stakeholders and focused on establishing their participation.

Within the scope of this Project, vulnerable individuals and groups can be disabled individuals, elderly individuals, and immigrants, refugees and non-native Turkish speakers. These groups in particular are experiencing certain disadvantages in benefitting from public services and are likely to be directly affected by sub-projects.

- Engagements will be carried out with regional organizations and NGOs representing the rights of persons with disabilities;

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- Separate consultations will be conducted for elderly individuals and disabled individuals (or people with additional accessibility needs), immigrants, refugees and non-native Turkish speakers, and other disadvantaged/vulnerable groups who may be identified during the project;
- Information on the project will be provided face to face or by any other appropriate method specific to disadvantaged/vulnerable groups/individuals to be specified or specified (e.g. visually impaired alphabet, sign language, etc.);
- Consultations will be conducted at locations that provide access to disadvantaged/vulnerable groups/individuals; and
- Any written or printed materials related to the project to be distributed at project sites should be accessible to the disadvantaged/vulnerable groups/individuals of the project; the materials will also be prepared in culturally appropriate and easy to understand (non-technical) language.

11 Roles, Responsibilities and Resources for Stakeholder Engagement

Resources

MoH is the implementing agency for the project. The same Project Management and Support Unit (PMSU) under the Türkiye Health Systems Strengthening and Support Project is utilized with an additional support from one environment and one social specialist assigned to the PMSU. The PMSU will carry out the stakeholder engagement activities in partnership with the other units of the MoH who are beneficiaries of the Project.

Responsible Party	Responsibilities
MoH PMSU	<ul style="list-style-type: none"> • Incorporating all stakeholder engagement activities which will be undertaken by MoH into the environmental and social management systems • Monitoring the SEP and GM PMSU to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues. • Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues
Social Expert (PMSU)	<ul style="list-style-type: none"> • Planning and implementation of the Project level SEP • Ensuring that stakeholder engagement is understood by PMSU members and other stakeholders • Organizing/managing stakeholder engagement related activities • Coordinating interface and reporting to/from the World Bank on the implementation of the SEP • Updating the Project level SEP periodically and in case of major Project changes • Monitoring and supporting the PMSU regarding communication with stakeholders and stakeholder engagement is at the maximum level • Monitoring the progress of the project • Ensuring the successful delivery of all defined documents • Implementing social and environmental monitoring • Monitoring and reporting about the social and environmental issues specified in the relevant documents that are implemented throughout the Project
Environmental Expert (PMSU)	<ul style="list-style-type: none"> • Monitoring the progress of the project • Ensuring the successful delivery of all defined documents • Implementing social and environmental monitoring • Monitoring and reporting about the social and environmental issues specified in the relevant documents that are implemented throughout the Project
Procurement Expert	<ul style="list-style-type: none"> • Providing consultancy in tenders to be held within the scope of the Project. • Ensuring that respective environmental and social instruments are incorporated into the tender documents

	<ul style="list-style-type: none"> • Preparing English and Turkish copies of the tender documents
Technical Expert	<ul style="list-style-type: none"> • Providing technical support to the project
Governmental Authorities (both local and national level)	<ul style="list-style-type: none"> • Providing inputs and feedback during the preparation and implementation phases of both project level SEP and sub-project specific SEPs • Participating in relevant stakeholder engagement/consultation meetings

Management functions and responsibilities

The Project is implemented by the MOH through the existing PMSU that implements the ongoing World Bank-financed Türkiye Health System Strengthening Project. The PMSU will support the MOH and directly implement technical activities, including procurement of medical supplies and equipment for activities.

The PMSU will report regularly to the Vice Minister of Health in charge of this operation and the ongoing Health Systems Strengthening Project.

The stakeholder engagement activities will be documented through project progress reports, to be shared with the World Bank on a quarterly basis.

12 Grievance Mechanism

The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Supports accessibility, anonymity, confidentiality and transparency in handling complaints and grievances;
- Avoids the need to resort to judicial proceedings (unless as a last resort).

A new grievance mechanism is established particularly for this project. Figure 12-1 summarizes the different steps of the GM:

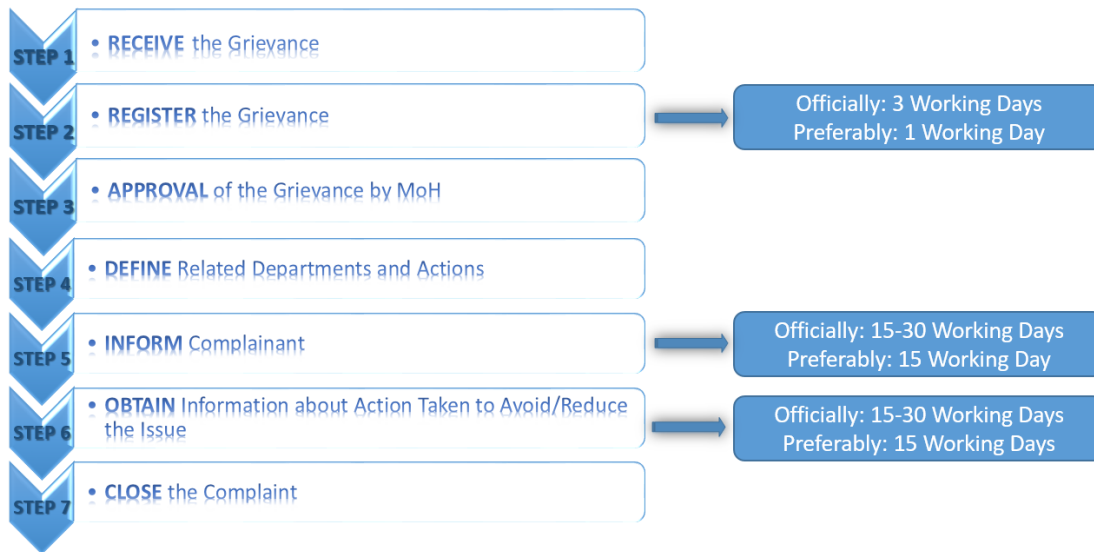


Figure 12-1 GM of the Project

Since the Project includes whole provinces in Türkiye, national mechanisms generated that are already in use (mentioned below) will be integrated to newly established . By providing necessary software integrations to new system, only Project related complaints are planned to be filtered from national systems and conveyed to Project specific grievance mechanism system.

National systems to be integrated are **SABIM** (MoH Communication Center) and **SBN** (Meeting Point at Health).

A. SABIM: Communication Centre of Ministry of Health “ALO 184”

The Ministry of Health founded a Communication Center (SABIM) in 2004 to receive patient complaints, problems and suggestions either in person or anonymously. These can be reported to SABIM by:

- 📞 Hotline by phone via the “Alo 184” line 24/7 (established by Türk Telecom),
- 🌐 Online via <https://sabim.saglik.gov.tr/login.aspx>,
- 📱 WhatsApp Number via 0541 888 0184, or
- 👤 In person at a Patient Communication Unit.

SABIM which serves also as a ministerial level grievance mechanism for its employees, health workers, patients and citizens at large. Inquiries, demands, complaints about all health services provided by MoH are responded by a professionally managed call center with 260 operators, 187 analysts and 69 other staff.

The hotline also provides translation support in 6 languages English, German, French, Arabic and Russian, and also includes specialized services for disabled under the “Unimpeded Health Communication Center (ESIM)”. The ESIM provides services 7/24 in sign language in order to ensure access of the disabled citizens to the health services. Available free of charge on the mobile phones, ESIM offers live interpreting services

for the persons with hearing disorder while calling 112 ambulance center, getting appointment from the Central Appointment System and during medical examinations.

Applications to the 184 SABİM Call Centre are replied to and recorded by operators using special software. The recorded applications are assessed by SABİM officials and transferred to related administrators. Firstly, analyst examines the application. In cases that need urgent solutions, analyst conducts necessary research and coordination works by intervening immediately. For cases that do not need urgent solutions, analyst manages the resolution process by making an importance list among cases and then analyze.

Analysts working at the headquarter and/or field units of the Ministry have access to the system on Internet, view duties assigned to them, take required actions, and report the results through the system. Administrators are able to monitor transactions of analysts, which were taken against applications concurrently through the system.

SABİM Operators take the calls of respondents calling the ALO 184 Line, create their applications during the call, and send the applications to the SABİM Analyst after registering them in the system as a petition. The Analyst examines the applications that are directed, conducts the necessary search and coordination works by intervening immediately in urgent situations, and manages the analysis process according to the order of importance of the applications in cases of urgency. It informs citizens in line with the legislation. If the applications require further investigation, they send the applications to the dispatch team. The dispatch team examines the applications, finalizes the applications when necessary, or sends them to the analyst of the Central or Provincial Health Directorates at the relevant unit depending on the content of the applications.

The Central or Provincial Analyst examines all the details of the submitted application and takes the necessary actions. After these processes are completed, the citizen is informed as soon as any feedback is obtained in defined time frames. Transactions made and results entered into the system are evaluated by SABİM Unit Officers. The application whose review has been completed is closed by the Unit Responsible.

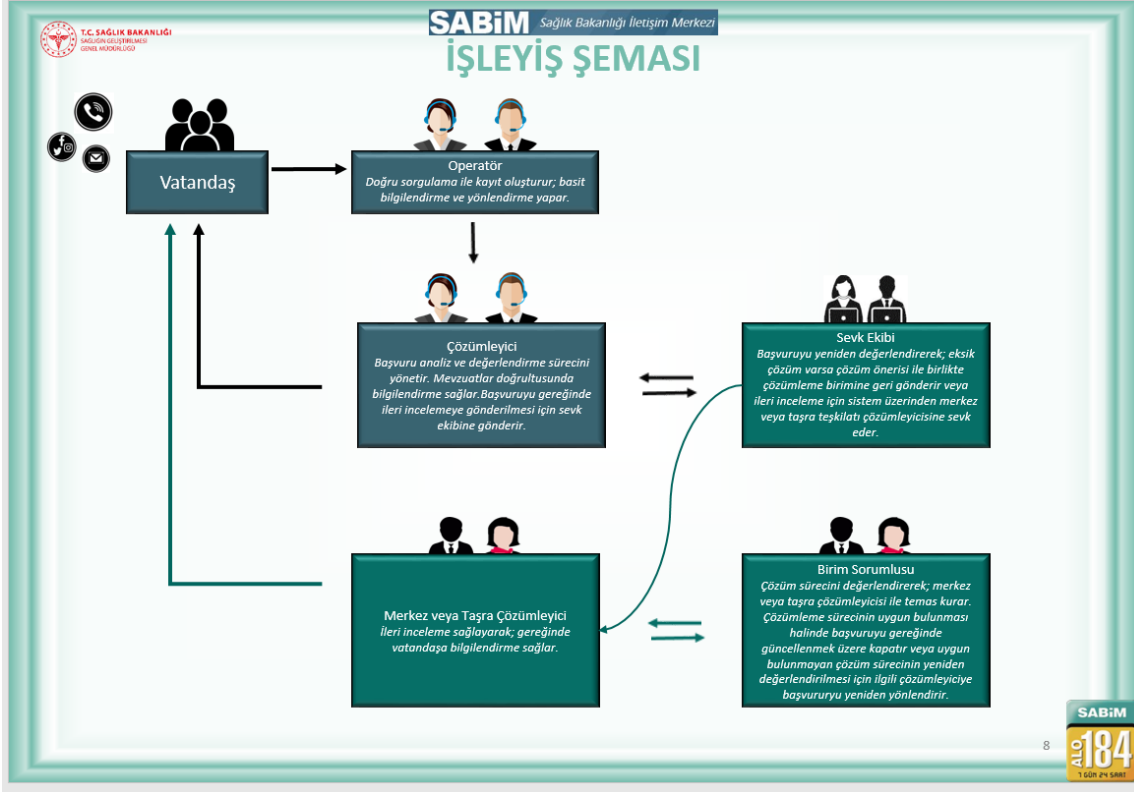


Figure 12-2 Flowchart of SABİM

Until the establishment of SBN website in 2011, MoH and health workers also used this system to raise their voices and submit grievances. However, the establishment of SBN generated a new platform for MoH and health service personnel to raise their voices.

Responsibilities and services given by SABİM are listed below:

1. To conduct engagement and communication processes between complainant and MoH via phone, e-mail, online, WhatsApp and social media,
2. To process any data and grievance that is directed from Turkish Presidential Communication Centre (CİMER) which is the national level of information and grievance mechanism in Türkiye, and
3. To carry out process related to the wishes and complaints from other public institutions and organizations related with Health service area in Türkiye for Turkish and Non-Turkish citizens.

Grievances received by SABİM, ALO 184, are resolved **no later than fourteen business days** that is dictated under the Law of Right to Information No 4982. Institutions and organizations provide access to information or document requested upon application **within fifteen business days**. However, number of days will raise to **30 business days** in cases the application concerns *more than one institution and organization* such as:

- The requested information or document is provided from another unit within the institution and organization applied for;
- The opinion of another institution and organization is demanded.

Anonymity: With the "Hide My Personal Information" button on the application registration screen in SABİM, the information of the citizens can be hidden in accordance with the demands of the individuals and depending on the sensitive content of the application. However, in applications involving harassment allegations, it is informed that the information of the person will be exposed due to the fact that the subject is being moved to the judicial authorities, and it is communicated that the application cannot be examined if the personal information is hidden. If the citizen gives consent to create applications without hiding their personal information, applications are directed to the relevant institutions. If the person has any statement of violence / threat against the healthcare worker, there is also no confidentiality of personal information in these applications. Because the person's statements and information are notified to the institution's superiors by searching the relevant institution and by sending the application. However, if there is a grievance of the citizen in the meantime, the grievances are written in the application content in detail and the application is sent to the relevant institutions in order to evaluate the application.

Accessibility: Disabled people, asylum seekers, refugees and those with temporary protection (Syrians) registered in Türkiye can also reach SABİM. For those who are not native in Turkish, an Interpreter Line is available communication can be held simultaneously. Communication is provided by conducting teleconferences.

Handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) issues: First responders will be trained on how to handle disclosures of SEA/SH. Health workers who are part of the disaster response will be trained with the basic skills to respond to disclosures of SEA/SH that could be associated with or exacerbated by the disaster impacts, in a compassionate and non-judgmental manner and know to whom they can make referrals for further care or bring in to treatment centers to provide care on the spot. Türkiye has already a national referral system for GBV, not only domestic violence but also workplace related harassment, bullying, violence as well as SEA/SH at work place, which all institutions and health care facilities are following. These are under the auspices of Ministry of Family, Labor and Social Services and already detailed in both the Turkish Labor code and Turkish Penal code, where unacceptable behaviors are explained and relevant penalties are detailed. Psychosocial support is already provided and available for women and girls who may be affected by the disaster and are also gender-based violence (GBV) survivors. GM that will be in place for the project will also be used for addressing SEA/SH issues at work place and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues. Further, the GM will also have in place processes to immediately notify both the MoH and the World Bank of any SEA/SH complaints, with the consent of the survivor. Thus, the existing GM will also be strengthened with procedures to handle allegations of GBV/SEA/SH violations.

The grievances related to exploitation of female workers, including sexual harassment and abuse at the workplace and unfair treatment will be prioritized to take actions. The Project Director, Deputy Project Director and Social Expert shall be responsible for taking appropriate action in cases in which there is

reason to believe that any right has been violated. The appropriate designated authorities will be informed about investigations into cases of Gender-based Violence/SEA/SH, and of the action taken as a result of such investigations.

- All grievances and feedbacks will be handled with a fair and objective approach. Transparency and accessibility are also two main concerns of this redress mechanism.
- In addition, the number, frequency, topics of grievances and feedbacks will be analyzed and reported periodically to the related units and administrative level.
- Based on these detailed reports, the most frequently addressed issues are identified and improvement activities are initiated.

B. SBN: Meeting Point at Health of MoH

SBN is established for health service workers or graduates of any departments providing health education and all personnel of MoH to gather up-to-date information about appointment rules, compassionate leave, permutation requests and promotion exams; besides to submit grievances and any suggestions. To benefit from SBN services, members of mentioned worker groups should register to the system. As of July 2020, there are over 58.000 members registered to SBN.

After registration, they can convey their inquiries, demands and complaints via;

- 📞 Hotline by phone via the “Alo 182” line 24/7,
- 📞 Online via <https://sbn.saglik.gov.tr/>,

There are five sections in SBN portal that are:

1. Ask Us
2. I have an Idea
3. Billboard
4. Looking for Solution
5. Permutation

Inquiries, demands, complaints about all health services provided by SBN are responded by a team composed of 133 personnel.

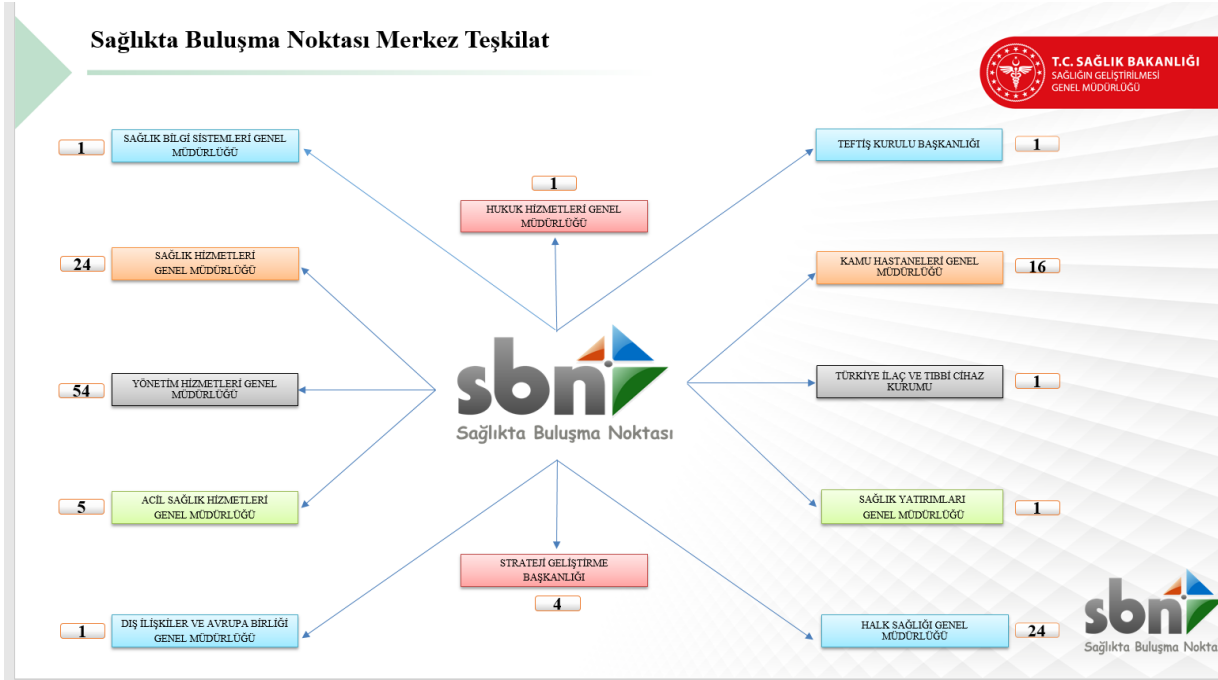


Figure 12-3 SBN Team at National Level

C. CİMER: Turkish Presidential Communication Center

Third national GM is “CİMER” which is “Cumhurbaşkanlığı İletişim Merkezi - Turkish Presidential Communication Center”. Grievances can be conveyed by:

- ✚ Hotline “Alo 150” (established by Türk Telecom),
- ✚ Written - Online via www.cimer.gov.tr, and
- ✚ Written – Post via T.C Cumhurbaşkanlığı Külliyesi 06560 Beştepe, Ankara, TÜRKİYE

CİMER conveys 99% of received complaints to related governmental institutions. Each grievance received for health sector via CİMER is already being conveyed to SABİM therefore CİMER and SABİM systems work integrated.

D. GRM under the Ministerial Level: Appeal Committee and Patient Rights Board of the Project

In 2003, the Ministry of Health issued the directive entitled “Practice of Patient Rights in Healthcare Facilities”, aiming to increase the recognition of patient rights and their implementation into services. This directive describes the mechanisms of the complaint procedure in the event of a violation of rights. The document also defines the structure and duties of the newly created Patient Rights Unit and Patient Rights Board. The Patient Rights Unit (PRU) and the Patient Rights Board (PRB) have a particular importance in the complaint mechanism. They are the foundations of the application system and the organs for the evaluation of any alleged incident. Patient’s Rights Units have to be present in hospitals having 100 or more beds, and Patient’s Rights Communication Units in hospitals having 100 or less beds. The Ministry

of Health has also enabled the establishment of patient's rights units and commissions within private hospitals by changing the private hospitals directive.

Process:

The Unit Officer, the first officer who meets the patient, is a healthcare worker (social worker, psychologist, nurse, etc.), and starts to work after receiving compliance training on public relations. If the problem cannot be resolved by oral communication at PRU, then the patient files a written complaint and the case is referred to the PRB. (This is also the case if the patient has filled out the application form (Annex-2) directly on the website). The PRB is chaired by the Vice-Chief of the hospital, who is in charge of hospital quality services. The PRB consists of a PRU Officer, the chief of the accused department, a representative of a non-governmental organization working in the field of patient rights (if needed), the patient's attorney, a union representative authorized by the institution, a citizen, and a member of the city council appointed by the city Governor. The PRBs do not have any power of sanctions; the file is referred to the administration of the hospital for disciplinary interrogation if necessary.



A decision is given within a month at the latest if the medical staff or the medical institution is at fault. The applicant or patient is informed of the decision as is the medical staff concerned and the top executive of the medical institution. If the commission finds the medical staff or institution guilty, the top executive has the authority to make inquiries about the staff and to impose punishment.

The results of a retrospective study performed using the complaint database of written and oral applications made to PRUs in 54 public hospitals operating under the authority of the Istanbul Health Directorate from 2005 to 2011 indicate that a total of 218,186 complaints were filed. Each year, the number of complaints increased compared to the previous year, and nearly half of the applications were made in 2010 and 2011 (48.9%). The three most frequent complaints were "not benefiting from services in general" (35.4%), "not being treated in a respectable manner and in comfortable conditions" (17.8%), and "not being properly informed" (13.5%). Two-thirds of the overall applications were found in favour of the patients (63.3%), but this rate has decreased over the years. The study found that 90.7% of the applications were resolved "on-site" in PRUs, and the percentage of complaints resolved in favour of healthcare workers has been steadily increasing over the years in PRBs. A simple explanation and a verbal apology resolved a significant proportion of the complaints.

E. Appeals Committee (AC) for the Project

In order to strengthen the existing GM and raise reliability of GM process, MoH established "Appeals Committee (AC)" comprising of 11 consultants having knowledge about Turkish health system and its practice on site. These consultants are the field coordinators of "Health System Strengthening and Support Project" of World Bank Loan No. 8531 which is already being implemented by UNDP.

AC will consider complaints on which MoH and the complainant could not reach an agreement on:

-  Constraints on reaching procured equipment,
-  Operational issues of procured equipment and materials

The complainant is free to convey his/her demand for transferring his/her complaint to the “Appeals Committee” so that any complaints that is already been considered by MoH but could not be resolved can be re-considered by the Committee.

Overview and Structure of Project GM

The operational flow of Grievance Mechanism for the stakeholders is as follows (Fig. 4):



Based on the article "d) to carry out the press and public relations and information acquisition services of the Ministry in Article 357 (d) of the Presidential Decree No. 1; SABİM serves citizens with its central and provincial units. SABİM, established in 01.01.2004 within the framework of the "Health Transformation Program", which was launched in 2003 with long-term and important goals, is a meeting point where citizens can convey all their demands, ideas and opinions by acting as a bridge between the Ministry of Health. SABİM is an institution that maintains its services with the principle of "public interest" and is in constant communication with the citizens.

80% of the applications created in SABİM are resolved in the communication center within the first 24 hours. Most of the applications requiring further examination are examined and answered within the legal period. The applications, whose process is not completed, are checked through the system and necessary warnings are made to complete the process through official channels and the process is followed.

There are standards based on quality and performance data for the evaluation of the contact center processes and they are evaluated regularly on a monthly basis.

MINISTRY OF HEALTH SERVICE STANDARDS OF PRESS AND PUBLIC RELATIONS CONSULTANCY

Item Number	NAME OF SERVICE	DOCUMENTS REQUIRED IN THE APPLICATION	SERVICE COMPLETION DURATION (MAXIMUM)
1	Responding to Requests from Citizens by Call (Question, Request, Opinions, Suggestions,	T. C. identity number	3 Days

	Implementation Support and Administrative Issues)		
2	Responding to Inquiries from Citizens	Petition (Applicant's name and surname, signature, home or work address, if the applicant is a legal person, the name and address of the legal person and the petition containing the signature and authorization document of the authorized person)	15 Days
3	Responding to Citizens' Applications within the Scope of the Right of Petition	Petition (Name, surname and signature of the petitioner, work or residence address)	30 Days

Target groups have also used CİMER as grievance mechanism in addition to the SABIM service. Nearly 30.000 CİMER applications were also directed to MoH and responded in the stipulated time frame by MoH personnel. CİMER is staffed with around 30 people.

Both SABIM and CİMER issue fines to institutions in cases where complaints are not resolved in a timely manner.

Within the scope of the project, the existing GM of SABIM Call Center will be utilized as Project GM and MoH will adjust the SABIM to track project-specific grievances from citizens including workers' grievances.

The GM 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-teachers and parents-, community members, project implementers/contractors/service providers etc—all of whom will be encouraged to refer their grievances and feedback to the GM. The GM will also allow anonymous applications through its online and phone feedback channels.

The GM 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 services 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, abuse or any misbehavior/ misconduct
- 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 project activities, or actual implementation of the project
- General feedback, questions, suggestions, compliments.

The timeframe for acknowledging the receipt of the grievance is 3 days. Addressing and responding to feedback is 15 business days from the time that it was originally received, and this period is subject to extension upon the written consent of the MoH PMSU Director.

13 World Bank Grievance Redress Mechanism

The requests/inquiries/grievances related to the Project will be tracked under a separate IT module which will be developed as part of this Project under this existing GRM and reported every quarter to the World Bank during implementation. The project will have a webpage under the MoH website and will share information regularly on the activities and results. It will also have an online complaint box inserted into the webpage in addition to the national GRM. The SEP will be updated once the project specific webpage and a project specific hotline will be assigned under the PMSU.

In updated version of the SEP, a fuller description of the GM will focus on typology of complaints and complainants to provide more efficient management. Possible examples: the highly vulnerable, persons with disabilities, people facing language barriers, disruptions in areas neighboring facilities, etc. The contact information for the GRM will be provided in the updated SEP which will be finalized 30 days after the project effectiveness date.

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the Bank'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 Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of Bank 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 Bank's corporate Grievance Redress Service (GRS), please visit: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7. Monitoring and Reporting

The SEP will be periodically revised (at least semiannually) and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Quarterly summaries and internal reports on public grievances (grievance log – Annex 1), enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions, will be collated by the designated GM officer, and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:

- i. Number of health workers obtaining information and sharing feedback about the Project.
- ii. Number, consultation meetings and other public discussions/forums conducted within a reporting period (i.e. quarterly);
- iii. Number of project grievances received within a reporting period (i.e. quarterly/six monthly) and number of those resolved within the prescribed timeline.

Annex 2: Application Form

Application Form		
Type of Application	Grievance	
	Suggestion	
	Information	
Province of Application		
Institution/Organization of the Application		
Subject of the Application		
Name-Surname (For Anonymous applications, leave this section empty)		
Preferred Tools to Contact and Contact Information (Please choose at least one tool)	Phone:	
	E-Mail	
	Mail:	
	Fax:	
Date of Application	Day/Month/Year	



Republic of Türkiye

Ministry of Environment, Urbanization and Climate Change

**TÜRKİYE EARTHQUAKE RECOVERY &
RECONSTRUCTION PROJECT (TERRP)
(P180849)**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

DRAFT

APRIL 2023

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ABBREVIATIONS AND ACRONYMS

CIMER	The Communication Center of the Presidency
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GDCA	Directorate General of Construction Affairs
GM	Grievance Mechanism
GRS	Grievance Redress Service
GT	Government of Türkiye
LMP	Labor Management Procedures
MoAF	Ministry of Agriculture and Forestry
MoENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoH	Ministry of Health
MoI	Ministry of Interior
MoT	Ministry of Trade
MoTI	Ministry of Transport and Infrastructure
MoYS	Ministry of Youth and Sports
PDoEUCC	Provincial Directorate of Environment, Urbanization and Climate Change
PIU	Project Implementation Unit
POM	Project Operational Manual
RF	Resettlement Framework
RP	Resettlement Plan
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
TERRP	Türkiye Earthquake Recovery and Reconstruction Project
WB	World Bank

EXECUTIVE SUMMARY

[To be completed after the finalization of the SEP.]

1. INTRODUCTION

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process implemented within the scope of the Türkiye Earthquake Recovery & Reconstruction Project (“TERRP” or the “Project”). The SEP is prepared under the World Bank’s ESS10 Stakeholder Engagement and Information Disclosure.

Two earthquakes with a magnitude of 7.8 Mw (± 0.1) and 7.5 Mw occurred on February 6, 2023, nine hours apart, with epicenters in the Pazarcık and Ekinözü districts of Kahramanmaraş, respectively. As a result of the earthquakes, at least 50 thousand 399 people died in Türkiye, and at least 8 thousand 476 people in Syria according to official figures, and more than 122 thousand people were injured in total. More than 24,000 aftershocks of up to 6.7 Mw occurred after the earthquakes. The provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, Şanlıurfa and Elazığ were affected by the earthquakes.

This project will provide financing to AFAD and MoEUCC for the support and improvement of emergency repairs, construction of new rural houses, and, if necessary, demolition/reconstruction of damaged infrastructure such as drinking water network, sewerage, and rural road in the provinces affected by the February 6, 2023 earthquakes. Within the scope of the project, it is aimed to finance approximately 1500 houses and infrastructure by the World Bank. The Project includes four components: Component 1 – Restoration of Municipal Infrastructure and Services; Component 2 – Restoration of Health Services; Component 3 –Emergency Housing Support and Recovery; Component 4 – Project Management, Monitoring & Evaluation. MoEUCC will be responsible for Component 3 and Component 4.3 with the AFAD.

The project will be implemented by MoEUCC through its GDCA. Within GDCA a separate department, the Internationally Funded Seismic Retrofitting Department has been established in 2022 to work as the dedicated Project Implementation Unit (PIU) to manage the ongoing Seismic Resilience and Energy Efficiency in Public Buildings of Türkiye (SREEPB), which consists of Project implementation and TA activities related to the public building sector. This department is responsible for the day-to-day management of the SREEPB Project under terms of reference and with adequate staffing, and with qualifications and functions acceptably to the Bank. The department/PIU currently includes about 14 technical staff and 5 individual consultants hired to support in the areas of procurement, financial management, engineers (electrical, mechanical, civil), environment and social issues, and communication. A new team will be established under this existing PIU to administer all aspects of the proposed Project.

Accordingly, while undertaking works and activities to meet the objectives, GDCA will also aim to ensure the continued involvement and participation of their stakeholders throughout the project life.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for the successful management of the project’s environmental and social risks. Communicating early, often, and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays. In addition, the framework assists in managing stakeholder expectations which will have a bearing throughout the lifespan of the project.

The objectives of the SEP are the identification of the project stakeholders at different stages of development and the establishment of their rules for the management of the exchange of information between the Project Implementation Unit (PIU) and the stakeholders in line with the national regulation and the World Bank (WB) Requirements. The purpose of the SEP is to present how the GDCA/PIU plans to communicate with stakeholders who may be affected by or will be interested in the TERRE Project

throughout the project life cycle. It also describes a grievance mechanism, which is a process that stakeholders may use to raise any concerns about the Project providing their opinions that may influence the Project implementation and its results.

The Stakeholder Engagement Plan is a living document, so it will be reviewed and updated periodically and in line with new activities, changes in the Project, and newly identified stakeholders. The up-to-date version of this SEP will be disclosed before starting the project activities.

2. PROJECT DESCRIPTION

a. PROJECT OBJECTIVE

Project Development Objective is to emergency housing support and recovery in the provinces affected by the February 6, 2023 earthquakes. In the provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, Şanlıurfa, a total of 143,261 rural houses will be reconstructed with their infrastructure if needed. In the scope of the Project,

- Resilient reconstruction of collapsed/heavily damaged rural houses and barns in-situ or in new locations, including assessment studies, design/supervision consultancy, and works. Where there is relocation, site selection is to be consistent with WB ESF.
- Repair/strengthening and reconstruction of damaged infrastructure (including water, sanitation, roads) and social facilities in villages where housing is being improved or construction of such infrastructure/facilities in new houses,
- Technical assistance to strengthen aspects of the existing rural housing program in a post-disaster context,
- Technical assistance and advisory services to support key strategic approaches and planning for medium/long-term resilient recovery, including multi-hazard risk assessments and mitigation plans, integrated housing and infrastructure planning, urban/land use plans, etc., and urban area restructuring will also be addressed under the Project.

The components and sub-components of the Projects are given in the next section by detailed.

b. PROJECT COMPONENTS

The Project includes four components: Component 1. Restoration of Municipal Infrastructure and Services; Component 2. Restoration of Health Services; Component 3. Emergency Housing Support and Recovery; Component 4. Project Management, Monitoring & Evaluation.

Component 1. Restoration of Municipal Infrastructure and Services

Subcomponent 1.1. Resilient rehabilitation and reconstruction of municipal infrastructure:

This subcomponent will finance rehabilitation and reconstruction of existing municipal water, sanitation, wastewater, and drainage services damaged by the earthquakes. Eligible activities will include the repair and reconstruction of damaged water and sewage networks, water treatment plants, wastewater treatment plants, stormwater drainage, etc. to be more disaster and climate resilient and, as such, be better adapted for the climate change and/or would consider introduction of climate-smart/nature-based technologies and solutions contributing to climate change mitigation. The subcomponent may also support the installation of temporary water and sanitation facilities for container cities, such as package wastewater treatment plants, solar thermal hot water collectors, portable rainwater storages, etc., as needed. This subcomponent will also finance rehabilitation and resilient reconstruction of municipal roads, bridges, underpasses, and allied infrastructure that have been damaged by the earthquakes.

Subcomponent 1.2: Resilient Recovery of critical municipal service facilities. This subcomponent will finance the rehabilitation and reconstruction of municipal fire station buildings and purchase of equipment required to restore the provision of firefighting, emergency response, and other critical municipal services. Eligible activities will include inter alia: (a) installation of prefabricated facilities to provide critical municipal fire and emergency services during transition periods and ensure

continuity of services, as needed; (b) repair and strengthening of lightly damaged municipal fire stations; (c) in-situ resilient reconstruction of destroyed, heavily and moderately damaged municipal fire stations or reconstruction of such facilities in new locations as deemed acceptable according to the World Bank's ESF; and (d) the acquisition of emergency response and municipal services equipment and vehicles (e.g. firefighting and rescue vehicles and equipment, solid waste collection vehicles, buses, street sweeping vehicles, etc.) to restore municipal capacity for essential service provision. These activities will also contribute to strengthening the capacity and preparedness of the affected municipalities to respond to future disasters, including climate change-imposed challenges and the expected growing impact of extreme weather and natural hazards.

Component 2. Restoration of Health Services. The responsibility for overall management and implementation of Component lies with the MoH through the existing Project Management Support Unit (PMSU). This component will support activities to ensure continuity of access to health services for the affected population in the immediate and short-term. This will include establishing and ensuring the operation of prefabricated primary health care (PHC) facilities and equipping field emergency hospitals, establishing a network of field and mobile PHC and diagnostic services, restoring depleted medical supplies, improving access to vaccination, supporting access to disability support, and supporting sanitation measures to ensure clean water and prevent infectious diseases.

1. Subcomponent 2.1. Ensuring continuity of primary-level and hospital-level health services:

This subcomponent will support the establishment of a network of fixed prefabricated family health centers supported by mobile PHC units. The prefabricated facilities are needed to replace the collapsed, heavily, and moderately damaged primary health care buildings (Family Medicine Centers) in the earthquake region until permanent PHC facilities can be reconstructed. The mobile units will also allow health care providers to provide services to displaced population in tent camps, container cities, refugee shelters and scattered villages in rural areas. In line with MoH's interim strategy to restore PHC services, the subcomponent will finance: (i) the installation of 350 prefabricated, fully equipped family health centers with an average of 3-4 family medicine units in each, for primary health care service delivery in the region; and (ii) procurement of 250 mobile health clinics to reach out to the different temporary settlements with large, displaced population and rural regions. This subcomponent will also support the operation of eleven prefabricated emergency hospitals through the procurement of furnishings and medical equipment.

Subcomponent 2.2: Providing mobile pharmaceutical and diagnostic services. This subcomponent will establish a network of mobile diagnostic services to support the field emergency hospitals and prefabricated PHC facilities. Activities will include the purchase of: (i) vehicles equipped with mobile imaging equipment, (ii) mobile public health laboratories for microbiology and water analysis, (iii) mobile computerized tomography devices, (iv) mobile digital X-ray and ultrasound devices, (v) home health care services vehicles and related kits, (vi) ambulances and fully equipped medical all-terrain vehicles, and (vii) mobile command control vehicles.

Subcomponent 2.3: Supporting access to vaccination, disability services, and medical equipment: This subcomponent will finance activities to restore MoH's capacity in vaccination, address the needs of people disabled due to the earthquakes, and curb the spread of infectious diseases. Activities will include: (i) the replacement of damaged provincial and district vaccine warehouses with prefabricated and light steel construction vaccine storage containers to be located in the major cities of Hatay, Malatya, Kahramanmaraş, Adıyaman and Adana that will service as regional vaccine warehouses for the earthquake region; (ii) provision of vaccine transport vehicles to ensure timely distribution of vaccines from the regional warehouses to settlements across the earthquake region, including container cities, dispersed villages in rural areas, and refugee shelter camps; (iii) provision of equipment for disability services, including inter alia, microprocessor prosthesis, orthotics and prosthesis, and battery powered wheelchairs; (iv) provision of equipment and capacity building for physical therapy and rehabilitation centers in earthquake-affected provinces; and (v) provision of essential medical supplies such as biocidal products and rapid test kits.

Component 3. Emergency Housing Support and Recovery. The responsibility for overall management and implementation of Component 3 will lie with MoEUCC's General Directorate for Construction Affairs

(GDCA), in close coordination with AFAD, the Strategy and Budget Presidency (SBP), the MoTF, and other relevant directorates of MoEUCC.

Subcomponent 3.1: Rural housing reconstruction: This subcomponent will finance civil works, consultancy, and non-consulting services to support the recovery of the earthquakes-affected rural villages under the government's existing post-disaster housing reconstruction program. For resilient reconstruction of rural houses assessed as collapsed, severely or moderately damaged, preference will be given for in-situ reconstruction to the extent possible under the Project. Civil works for infrastructure will support the repair of damaged municipal infrastructure/engineering networks where housing is reconstructed in situ and the new construction of such infrastructure where housing is being relocated to new sites. The subcomponent will also provide technical assistance to strengthen the current post-disaster rural housing program.

Subcomponent 3.2: Resilient recovery foundations for cities and inclusive post-disaster housing support: This subcomponent will finance technical assistance and advisory services to AFAD's General Directorate of Housing and Construction Works, and MoEUCC's General Directorate of Construction Affairs to support planning for medium/longer term resilient reconstruction and improve post-disaster housing programs for future disasters.

Component 4. Project Management, Monitoring & Evaluation

This component will finance consultant and non-consulting services, goods, training, and operating costs for supporting the Implementing Agencies in project management and implementation activities under the Project, including for, but not limited to, monitoring and evaluation, reporting, procurement, financial management, environmental and social management, grievance redress mechanism, and project communication and outreach.

MoEUCC will be responsible for Component 3 and Component 4 in close coordination with AFAD. MoEUCC will be responsible to carry out the building assessments in compliance with the "Presidential Decree No:1-Regulating the duties and responsibilities of MoEUCC". Considering the urgency of the work, the MoEUCC was granted special powers with the "Law on Acceptance of the Presidential Decree Regarding Settlement and Construction Under the Event of Emergency" published in the Official Gazette dated April 10, 2023, No:32159. For instance; without waiting for the special zoning plans, the MoEUCC has the authority to make the application with the lay-out plan and building permit in line with the geological survey and ground survey report. MoEUCC is authorized to make all kinds of constructions including infrastructure and superstructure and to determine the land shares. AFAD will be responsible to (with MoEUCC's technical input) identifying the resettlement areas and to confirm the areas suitable for in-situ reconstruction/strengthening. AFAD will develop and provide a portfolio of villages for strengthening and/or reconstruction to MoEUCC. AFAD will undertake and finalize the identification of rights holders'.

MoEUCC and AFAD will work in close coordination and collaboration through a protocol to be signed .

The Project will carry out meaningful consultations with the rights holders' on i) choice of resettlement areas; ii) designs, iii) scope of agreements and financial obligations, iv) to identify other needs of the stakeholders those can be considered/supported and matches these with existing support already provided by the government.

MoEUCC currently has five (5) typical types of house designs for rural housing which have been already implemented in different provinces due to different disasters experienced in Turkiye. During implementation, of these five existing typical housing design , the beneficiaries will be asked for their preference. In addition to these above mentioned five typical housing types, the MoEUCC also has a pool of typical house designs which can be utilized for this Project to be able to meet smaller housing needs and more economical preferences of the beneficiaries.

c. PROJECT LOCATION

The two earthquakes with a magnitude of 7.8 Mw (± 0.1) and 7.5 Mw occurred on February 6, 2023, nine hours apart, with epicenters in Pazarçık and Ekinözü districts of Kahramanmaraş, respectively. As a result of the earthquakes, at least 50 thousand 399 people died in Türkiye, and at least 8 thousand 476 people in Syria according to official figures, and more than 122 thousand people were injured in total. More than 24,000 aftershocks of up to 6.7 Mw occurred after the earthquakes. The Project will be carried out in the provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, and Şanlıurfa shown in the map provided in Figure 6 given below.

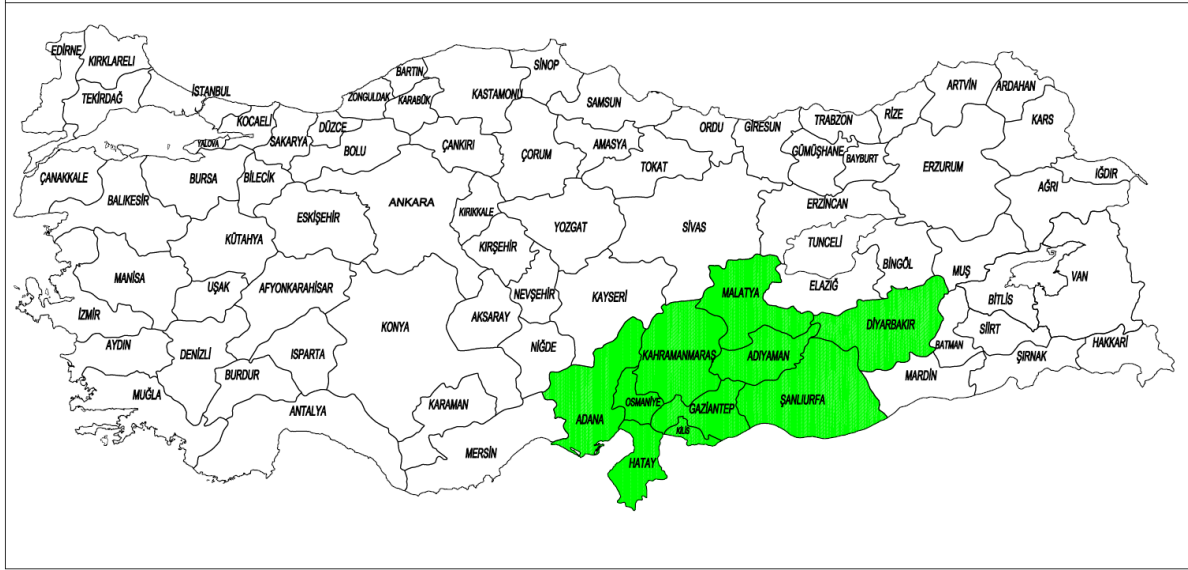


Figure 5 .: Project Provinces

In addition to the destruction in the cities, the earthquakes damaged 143,261 rural houses (see Figure 6) and all of them have to be rebuilt. However, approximately 1500 houses and their infrastructures will be supported and financed in this Project.

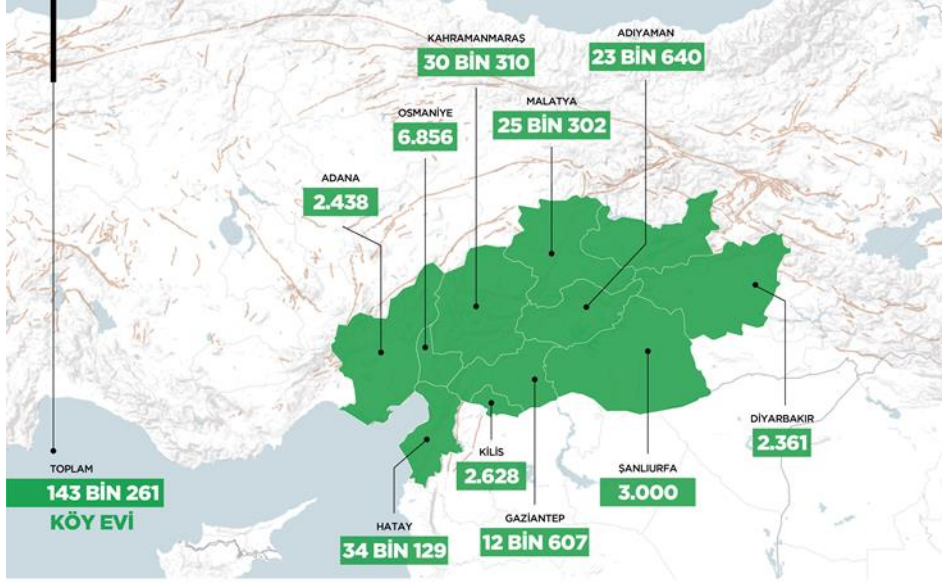


Figure 6. : The breakdown of houses to be reconstructed by city in the earthquake region

The identification process of the exact locations of the houses to be built within the scope of the project is still under discussion and once the list of provinces and villages are finalized, this SEP will be updated accordingly.

3. REGULATORY CONTEXT

a. NATIONAL LEGISLATION FOR STAKEHOLDER ENGAGEMENT

The right to information is the right of individuals to access the information included in the records of public institutions and agencies. National legislation on the right to information is:

- Constitution of the Republic of Türkiye
- Law on the Right to Information
- The Law on Use of the Right to Petition
- Regulation on Environmental Impact Assessment

Constitution of the Republic of Türkiye

Stakeholder engagement is secured by the Constitution of the Republic of Türkiye. The Constitution contains provisions that ensure that people can freely express their views. Article 25 of the Turkish Constitution is the article "Freedom of thought and opinion". According to this article, nobody can be forced to express their thoughts and convictions for whatever reason and purpose; cannot be condemned or accused because of his thoughts and convictions. As emphasized by the "Freedom to Explain and Spread Thought (Article 26 of the Constitution of the Republic of Türkiye)"; everyone has the right to express and disseminate their thoughts and opinions individually or collectively by word, text, picture or other means. This article also covers the freedom to receive or impart information or ideas without the intervention of the official authorities. At the same time, everyone has the "Right to Petition" (Article 74 of the Constitution of the Republic of Türkiye). Accordingly, the principle of reciprocity citizens and foreigners residing in Türkiye on condition that observance, on their own or with the wishes and complaints about public authorities and Türkiye has the right to appeal in writing to the National Assembly.

The Presidency's Communication Center (CİMER) is an official government tool used to receive requests, complaints and applications from the public. Communication channels of CİMER are as follows: :

- Online application through the website; <https://www.cimer.gov.tr/> and in E-Government website; <https://giris.turkiye.gov.tr/>
- Hotline: 150
- Address: T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara
- Phone: +90 312 590 2000
- Fax: +90 312 473 6494

Public institutions and agencies shall provide the requested information within 15 working days. If 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 content of the application pertains to 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 (Article 11).

Law on the Right to Information (No. 4982)

The purpose of this law is to regulate the procedure and basis of the right to information in accordance with the principles of equality, impartiality and openness, which are the requirements of a democratic and transparent government. According to the obligation to provide information (Article5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of

information and documents, considering the exceptions set out in this law, to provide information to applicants; and to evaluate and decide on applications promptly, effectively and correctly. **The Law on Use of the Right to Petition**

Based on "Article 3 of the Law on the Exercise of the Right to Petition", citizens of the Republic of Türkiye, may submit their complaints to the Grand National Assembly of Türkiye through written petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Türkiye are entitled to enjoy this right. **Regulation on Environmental Impact Assessment**

The Environmental Law No. 2872, which was published in the Turkish Official Gazette No. 18132 dated 11 August 1983 and amended in the Official Gazette dated 29 Mays 2013 (by Law No. 6486), establishes the underlying legal framework of the environmental legislation in Türkiye and is supported by a large number of regulations. Article 10 of the Environmental Law constitutes the main framework of the Environmental Impact Assessment Regulation (EIA Regulation) published in the Official Gazette No. 31907 dated 29 July 2022.

- b. Within the scope of EIA, for the projects included in the Annex-I list, a public participation meeting (PPM) will be organized by the bodies and organizations authorized by the MoEUCC with the participation of the project owner on the date set by the MoEUCC and at the place and time determined by the Governor's Office before the Committee determines the scope to inform the public about the investment and to hear their opinions and suggestions regarding the project.

INTERNATIONAL LEGISLATION FOR STAKEHOLDER ENGAGEMENT

UN Universal Declaration of Human Rights

The Universal Declaration of Human Rights (UDHR) is a milestone document in the history of human rights. Drafted by representatives with different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 (General Assembly resolution 217 A) as a common standard of achievements for all peoples and all nations.

It is defined that stakeholder engagement in the context of respect for human rights is “an ongoing process of interaction and dialogue between a company and its potentially affected stakeholders that enables the company to hear, understand and respond to their interests and concerns, including through collaborative approaches.

World Bank Requirements

The Environmental and Social Standard (ESS) 10 "Stakeholder Engagement and Information Disclosure" of the World Bank's Environmental and Social Framework (ESF) recognizes, " the importance of open and transparent engagement between the Borrower (ILBANK PIU) and project stakeholders as an essential element of good international practice." In more detail, the requirements set out by ESS10 are as follow: :

1. 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”
2. “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.”

3. “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.”
4. “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)”.

Within the framework of these principles, Stakeholder Engagement Plans are to be prepared in line with the principles and process defined in the SEP taking into account the features of the sub-projects/activities at the implementation stage. A Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts need to be developed by the Client. It has to be disclosed as early as possible, and before project appraisal and the Client needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Client has to disclose the updated SEP.

The MoEUCC PIU will be responsible respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project on time. To this end, the MoEUCC will propose and implement a grievance mechanism (GM) to receive and facilitate resolution of suggestions and complaints. The scope, scale and type of the required GM will be proportionate to the nature and scale of the potential risks and impacts of the project. The GM may include: (i) enable submission of grievance and concerns in person, by phone, e-mail and/or website; (ii) a log where grievances are registered in writing and maintained as a database; (iii) publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances; (iv) transparency about the grievance procedure, governing structure and decision makers; (v) an appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved

4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

After the February 6, 2023 earthquake, all units of the Ministry of Environment, Urbanization, and Climate Change carried out visits to the disaster area and following the completion of damage assessment studies, informative meetings with the participation of the local people, muhtars, NGOs, district governors, have been organized and carried out. Details of these informative meetings are provided in Table 7 given below.

Table 9. Stakeholder Meetings

Stakeholder Meetings		
Meeting Chaired by	Location	Date
General Director of Construction Affairs	Gaziantep	27.02.2023
Minister of Environment, Urbanization and Climate Change	Kırıkhan, Antakya, İskenderun Districts (Hatay)	28.02.2023
General Director of Construction Affairs	Hatay Center	02.03.2023
General Director of Construction Affairs	Defne District (Hatay)	02.03.2023
Minister of Environment, Urbanization and Climate Change	Adıyaman	02.03.2023
Minister of Environment, Urbanization and Climate Change	Kahramanmaraş	05.03.2023
Minister of Environment, Urbanization and Climate Change	Malatya	07.03.2023
Minister of Environment, Urbanization and Climate Change	Akçadağ District (Malatya)	17.03.2023

During the meetings, the strategy of the government for the recovery period have been introduced, concerns and suggestions of local residents have been received and responded and the housing designs have been introduced,

Considering the urgency of the situation, most of the Ministry's personnel were involved in damage assessment activities in the earthquake zone. Therefore, at the time of the meetings, there was no staff taking notes of the questions and answers. For this reason, the question-and-answer section cannot be presented. However, the photographs of the meetings are included in Annex 5.

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS (MAPPING)

The identification and analysis should be carried out as early as possible in the project cycle by considering dynamics among the stakeholders, risks and opportunities of their inclusion in the Project and should,

- categorize stakeholders (individuals, NGOs, government institutions, etc.),
- indicate how each stakeholder group will be impacted (directly/indirectly), and
- assess their level of interest and potential influence on the project.

To meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project(s) will be arranged during the whole life-cycle, carried out openly, free of external manipulation, interference, coercion or intimidation;
- **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- **Inclusiveness and sensitivity:** stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are encouraged to be involved in the consultation process, to the extent the current circumstances permit. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, and elderly and the cultural sensitivities of diverse ethnic groups.

Stakeholder identification is a key step in managing the overall stakeholder engagement process. It reduces the risk that a narrow stakeholder group can dominate the consultation process. The basis of stakeholder identification is their level of interest and interaction with the project. Accordingly, project stakeholders are categorized under the following groups:

- **Direct Stakeholders** refer to persons/groups/entities within the Project Area of Influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Indirect Stakeholders** refer to other individuals/groups/entities that may be positively or negatively affected by the scope of the project due to the project locations.
- **Other Interested Parties** refers to individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way
- **Disadvantaged/Vulnerable Individuals or Groups** refers to persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project

The frequency and the appropriate engagement method(s)/tool(s) for different stakeholder groups are identified by considering the following three criteria;

- the extent of the impact of the project on the stakeholder group,
- the extent of influence of the stakeholder group on the project, and
- the culturally acceptable engagement and information dissemination methods.

In general, engagement is directly proportional to the level of interest and influence, and as the extent of the impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used.

Table 10 summarizes the potential interests and influence of each of the above-mentioned affected parties.

Table 10. Identified Stakeholder Groups for the TERRE Project

Stakeholder Group		Level of Interest	Level of Influence
Direct Stakeholders	<ul style="list-style-type: none"> • Owners of village houses whose houses were destroyed or severely damaged due to the earthquake • Directly involved public administrations at the National, Provincial and District Levels (MoEUCC, MoCT, MoH, MoTI, MoENR, MoAF, MoT, Presidency of Religious Affairs) 	High	High
	<ul style="list-style-type: none"> • 		
Indirect Stakeholders	<ul style="list-style-type: none"> • Landowners and land users adjacent to the buildings • Residents of municipalities, neighborhoods 	Medium	High
Other Interested Parties	<ul style="list-style-type: none"> • Local governors and municipalities 	High	High
	<ul style="list-style-type: none"> • Construction companies and their employees • Consultants, supervisors 	High	Medium
	<ul style="list-style-type: none"> • NGOs – Associations at local and national level • Media • General public 	Low	Medium
Disadvantaged / Vulnerable individuals or groups	<ul style="list-style-type: none"> • Disabled individuals • Elderly individuals • Pregnant women and/or women with young kids • Female headed households • Immigrants, refugees, and non-native Turkish speakers • Children, including those that become orphaned following the disasters. • People suffering Post-traumatic Stress-Disorder (PTSD) and/or mental health issues as a result of the disaster impacts. 	Medium	Low

6. STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for the successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and forms an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.

The TERRP recognizes the rights of the local communities as key stakeholders in the project. Stakeholder engagement will be free of manipulation, interference, and intimidation, and conducted based on timely, relevant, understandable, and accessible information, in a culturally appropriate format. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions and ensure that this information is taken into consideration when making project decisions.

Stakeholder engagement activities will be ongoing through the whole life cycle of the Project, (Project's preparation, construction, and operation).

For the TERRP stakeholders will be engaged as early as possible and will continue the engagement throughout the planning, and implementation until the project is finished.

The nature and frequency of follow-up consultations will be different depending on the sub-projects to be developed.

Before starting the TERRE Project, all affected parties will be informed about the Project's scope, contact information (GM), and availability of the publicly available information on the GDCA website via consultation meetings, information boards, brochures, and flyers, printed newspaper, websites or social media.

Key communication principles are to:

- Keep the community and key stakeholders informed in advance of project progress.
- Encourage community participation.
- Listen to feedback, investigate suggestions, and adopt them where possible.
- Ensure transparency.
- Adapt appropriate communication including gender-sensitive and non-discriminatory language
- Apply user-friendly engagement tools.
- Use multiple channels for communication.
- Ensure safe space, and appropriateness how communication and engagements are handled, especially when working with vulnerable groups and people who are still recovering from post-disaster trauma.

The earthquake on February 6, 2023, caused devastation in 11 provinces of Türkiye. In addition to the city centers, serious destruction has occurred in the rural villages of these provinces. The people living in rural areas have serious problems in terms of housing. Local communities live in tents shared with other families. In addition, it is foreseen that insect problems will arise due to the warming weather. For these reasons, the people whose houses were destroyed due to the earthquake should be urgently relocated to new and safe housing. As a result of assessment studies, on-site reconstruction, including design/audit consultancy and

works, will be preferred. Where relocation is unavoidable due to seismic or other hazards, reconstruction will be on government-owned land in line with the requirements of the WB ESF¹¹.

¹¹ When the details of the project are clear, the PIU and the World Bank will consult on the preparation of the resettlement framework

6.1. PROPOSED STRATEGY FOR INCLUDING VIEWS OF VULNERABLE GROUPS

It is of particular importance to understand whether project impacts disproportionately affect disadvantaged/vulnerable individuals or groups who are often unable to raise their concerns or understand the impacts of a project. Awareness raising and stakeholder engagement activities regarding the project should be implemented taking into account the special constraints and cultural sensitivities of these groups and individuals so that they fully understand the project activities and benefits. Interaction with vulnerable groups and individuals often requires special measures and assistance to ensure that these groups and individuals are well aware of the overall process and their contribution to the process is in balance with other stakeholders and focused on establishing their participation.

Within the scope of this Project, vulnerable individuals and groups can be disabled individuals, elderly individuals, and immigrants, refugees and non-native Turkish speakers. These groups in particular are experiencing certain disadvantages in benefitting from public services and are likely to be directly affected by Project.

Table 4 summarizes preliminary mapping carried out for the identification of the disadvantaged/vulnerable individual/groups as well as the suggested stakeholder engagement methods for each disadvantaged/vulnerable individual/group. The stakeholder categories, including the disadvantaged/vulnerable individual/groups and accordingly this SEP will be updated before the commencement of any project activity.

Table 11. Summary of Disadvantaged/Vulnerable Individuals/Groups and Suggested Stakeholder Engagement Methods

Project Component	Vulnerable Groups and Individuals	Features/Needs	Preferred method for information sharing and consultation	Additional Resource Support
Component 3	Disabled individuals	Funding for training to assist individuals with lack of accessibility, information and special needs	Audio devices, accessible platforms, etc. special training needs	Special education coordinators, sign language translators/interpreters
	Elderly individuals	Lack of knowledge and inexperience about accessibility, online tools, services and communication channels	Communication methods in accessible areas	Not necessary
	Immigrants, refugees, and non-native Turkish speakers	Those who have difficulties in communication	Translated documents, special translators, communication in accessible areas	Translators
	Pregnant women and/or women with young kids	Accessibility, lack of information	Communication in accessible venues, methods	N/A

	Female headed households			
	Children	Safety, and appropriateness of communication and facilitation	Trained facilitators	Tailored communication media and approach
	People suffering from PTSD and mental health issues	Safety, timing, and appropriateness of communication and facilitation, preferably using professionals trained to handle post-disaster traumas.	Trained facilitators, psychologists	Psychological support

To include the views of vulnerable groups:

- Engagements will be carried out with regional organizations and NGOs representing the rights of persons with disabilities;
- For specific cases, such as engagement with children affected by the disaster, as well as individuals suffering PTSD and mental health issues, trained facilitators and/or psychologists may be mobilized.
- Separate consultations will be conducted for elderly individuals and disabled individuals (or people with additional accessibility needs), immigrants, refugees and non-native Turkish speakers, and other disadvantaged/vulnerable groups who may be identified during the project;
- Information on the project will be provided face to face or by any other appropriate method specific to disadvantaged/vulnerable groups/individuals to be specified or specified (e.g. visually impaired alphabet, sign language, etc.);
- Consultations will be conducted at locations that provide access to disadvantaged/vulnerable groups/individuals; and

Any written or printed materials related to the project to be distributed at project sites should be accessible to the disadvantaged/vulnerable groups/individuals of the project; the materials will also be prepared in culturally appropriate and easy to understand (non-technical) language

6.2.METHODS FOR STAKEHOLDER ENGAGEMENT

A variety of engagement techniques will be utilized to engage and consult with stakeholders, as well as to gather information from and deliver information to stakeholders.

The level of impact, in addition to the needs and concerns of the stakeholders will determine the basis of the communication tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in Table 2 below. The language of communication throughout the Project is expected to be Turkish; however, different languages will be also taken into consideration, if need be, to increase the efficiency of the engagement activities and ensure involvement of all stakeholder groups. The engagement activities will be carried out in a culturally appropriate manner and will include best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

Table 12. Engagement Methods to be employed under the Project

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> - Information sharing (in particular technical) on project requirements and impacts - Invitations to meetings and key events during project implementation - Arrangements for obtaining permits, licenses, transfer, and allocation of project land - Information and data requests that will be utilized for project implementation 	Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organizations/agencies
One-on-one meetings	<ul style="list-style-type: none"> - Information collection on an individual basis allowing stakeholders to voice their concerns/opinions about sensitive issues - Establishing personal connections with key actors 	Representatives of relevant state authorities and government officials, NGOs, local government, academia, and organizations/agencies, contractors and consultants
Formal meetings	<ul style="list-style-type: none"> - Collective information sharing on project requirements and impacts - Receiving comments, feedback, views and perception of project from a group of public institutions - Establishing relations with public institutions 	Different national and local government authorities and officials, NGOs, academia, and organizations/agencies, national and local media
Consultation meetings	<ul style="list-style-type: none"> - Information sharing (especially non-technical) to a large group of stakeholders, especially communities about the scope and timeline of the Project and sub-project activities. - Receiving comments, feedback, views and perception of project from a group of stakeholders - Collecting grievances and concerns related to the project - Establishing relations with affected communities, and groups 	Any stakeholder group identified throughout the project including the affected communities and groups, local NGOs, national and local government representatives/authorities, businesses, organizations/agencies, etc.
Face to face interviews	<ul style="list-style-type: none"> - Collecting baseline data on an individual basis with regard to project-affected people (PAPs) impacted by the project - Understanding, monitoring and assessing the project activities' environmental and social impacts and risks on an individual basis - Establishing relations on an individual basis 	PAPs, project workers (including workers to be employed for the construction activities, PIU staff, contracted workers, etc.), vulnerable/disadvantaged groups/people,
Focus group discussions	<ul style="list-style-type: none"> - Information sharing on a specific topic to a certain group of people including vulnerable groups - Receiving comments, feedback, views and perception of project from a certain group - Collecting grievances and concerns related to the project from a certain group - Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders - Establishing relations with certain groups 	Stakeholder groups relevant to the information to be shared and discuss during the meeting, vulnerable groups
ILBANK website	<ul style="list-style-type: none"> - Sharing project relevant information and update on progress 	Any stakeholder group identified throughout the project including

Engagement Method	Application/Purpose of the Method	Target Stakeholder
	<ul style="list-style-type: none"> - Disclosing project/subproject related documentation and communication tools: Environmental and Social Management Plan (ESMP), Resettlement Plan (RP), Ex-Post social audit document, grievance mechanism (GM), presentations, brochures, etc. - Announcements of key events (date/time, venue) 	affected communities and PAPs, national and local media, academia, NGOs, businesses, and organizations/agencies
Digital communication tools social media (<i>Facebook, Twitter, Instagram accounts, WhatsApp groups</i>), national/local television channels, radio stations, SMS, etc.	<ul style="list-style-type: none"> - Non-technical information sharing and progress updates - Announcements of key events, dates and published documents related with the Project 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses, and organizations/agencies
Project information brochures/leaflets	<ul style="list-style-type: none"> - Sharing brief project information to provide regular update - Informing the stakeholders on certain issues such as land acquisition, land entry and exit, project implementation schedule, scope of project activities and subprojects, etc. - Disseminating site-specific project information 	Any stakeholder group identified throughout the project including affected communities and PAPs, businesses and organizations/agencies
Online meeting (alternative tool if needed)	<ul style="list-style-type: none"> - Information sharing on a specific topic to a group of people including vulnerable groups - Receiving comments, feedback, views, and perception regarding the project from a certain group - Collecting grievances, concerns and feedback related to the project from a group - Monitoring project activities' environmental and social impacts and risks on a group - Establishing relations with local communities 	Any stakeholder group identified throughout the project, including project affected people, vulnerable groups, etc.
Grievance Mechanism (GM)	<ul style="list-style-type: none"> - Receiving and resolving any requests (such as suggestions, complaints, compliments, inquires for information or whistle-blower complaints) received by all project stakeholders 	Any stakeholder group identified throughout the project

6.3. INFORMATION DISCLOSURE

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the lifetime of the Project.

The PIU will provide all relevant and available information for the TERRP to the public through different communication channels (social media, official webpage, announcements, community representatives, local CSOs/NGOs etc). All project related documents, materials will be disclosed and made available throughout the life of the project on the official webpage of the MoEUCC.

All stakeholders, including the public, will be able to use the Grievance Mechanism (GM). The goal of the GM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express their concerns and grievances related to project activities. Detailed information about GM is given in Section 8.

The Supervision Consultant, under the supervision of the PIU, will prepare Project communication materials such as brochures, and posters for informative purposes and these materials will be delivered to the relevant stakeholders.

The PIU will be responsible for the disclosure of environmental and social instruments (ESMP/ESIA, SEP, RP, GM procedure, etc.) before the commencement of the project so that the stakeholders will be informed about the project details and communication channels to raise their requests (suggestions, grievances, questions, etc.) regarding the Project..

The PIU will be responsible for the disclosure and consultation of all environmental and social instruments to be prepared within the scope of the Project for 14 days to ensure dissemination of sufficient information to all stakeholders about project activities.

Table 3. The Overview of the Stakeholder Engagement Program

Project Phase	Consultation Subject/Message to be delivered	List of information to be disclosed	Method Used	Target Stakeholder	Frequency	Responsible Party
Preparation	<ul style="list-style-type: none"> • Inform the stakeholders about the scope and need of the Project. • Consult the stakeholders about <ul style="list-style-type: none"> ○ project design, including housing preferences, needs, choice of sites (if in-situ relocation is not feasible), requirements, etc. ○ Eligibility criteria, including options if not considered eligible. ○ environmental and social risks and impacts, ○ proposed mitigation measures, • Building back better • ESMF, RF, GMs 	<ul style="list-style-type: none"> • Project concept, E&S principles, and obligations • Eligibility criteria for housing, procedures to access project benefits, including any relevant requirements. • E&S documents (ESMF, RP) 	<ul style="list-style-type: none"> • Opening meeting • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools • Grievance Mechanism • Poster, brochure, leaflet, etc. • SMS • Engagement with vulnerable groups will be tailored to ensure safety and their inclusion as part of sub-project design. 	<ul style="list-style-type: none"> • Project Affected Parties • Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>Before the commencement of component activities</p> <p>Throughout the project lifecycle</p>	<ul style="list-style-type: none"> • MoEUCC PIU
Implementation & Construction	<ul style="list-style-type: none"> • Inform the stakeholders about the project scope and ongoing activities, including any emerging issues and/or problems • E&S documents (ESMF, ESMPs, RPs, etc.) • GMs 	<ul style="list-style-type: none"> • ESMPs • RPs • GM procedure • Regular updates on Project development/ implementation 	<ul style="list-style-type: none"> • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools • Grievance Mechanism • Poster, brochure, leaflet, etc. • SMS • Engagement with vulnerable groups will be tailored to ensure safety (in case there are grievances) as well as to enable their views being captured. 	<ul style="list-style-type: none"> • Project Affected Parties • Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>Prior to start of implementation of the project, and as needed during the project lifecycle</p>	<ul style="list-style-type: none"> • MoEUCC PIU • Supervision Consultants • Contractors
Operation	<ul style="list-style-type: none"> • GMs • Stock take stakeholders' views and perceptions about the houses constructed (to inform future activities and/or to identify remedial measures if needed) 	<ul style="list-style-type: none"> • Project outputs • Redress of grievances 	<ul style="list-style-type: none"> • Closing Meeting • Consultation meetings • Disclosure meetings, • Digital Communication Tools/social media • Poster, brochure, leaflet, etc. • SMS • As above on vulnerable groups. 	<ul style="list-style-type: none"> • Project Affected Parties • Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>After completion of sub-project activities, during the one-year warranty period</p>	<ul style="list-style-type: none"> • MoEUCC PIU • Municipalities • Utilities

6.4.REVIEW OF FEEDBACK FROM STAKEHOLDERS

Ongoing feedback and comments received from the stakeholders throughout the project implementation will be reviewed and necessary corrective actions, if needed, will be undertaken by the PIU through its social specialist, environmental specialist and project assistant .

Additionally, the project GM will be in place during the entire lifetime of the project to receive any concerns from both internal and external stakeholders.

7. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT

The PIU to be established under the GDCA will be responsible for the overall implementation of TERRP and also this SEP. The existing PIUs implementing different WB financed projects under the GDCA have qualified technical staff who have experience in managing design, and construction, and it will be strengthened more by hiring additional staff to provide efficient support to the TERRP.

The .

The Table 13 given below presents the roles and responsibilities of different parties to be involved in TERRP.

Table 13. Responsibilities of Key Actors/Stakeholders in SEP Implementation

Responsible Party	Responsibilities
PIU	<ul style="list-style-type: none"> • Incorporating all stakeholder engagement activities into the overall environmental and social management systems • Developing an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members • Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues. • Coordinating the parties for proper implementation of processes related to grievance mechanisms and stakeholder engagement issues
Social Specialist (PIU)	<ul style="list-style-type: none"> • Planning and implementation of the SEP • Ensuring that the stakeholder engagement is understood by PIU members and other stakeholders • Leading stakeholder engagement activities with identified stakeholders • Supporting other PIU staff that may have interaction with stakeholders • Coordinating interface and reporting to/from World Bank to implementation of SEP • Updating the SEPs periodically and upon major Project changes • Acting as the focal point for the GM in the PIU • Recording and following up on grievances relevant to the Project • Managing and coordinating the resolution of grievances within the Project • Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding stakeholder engagement and other Project activities and coming up with actions • Coordinating and monitoring GM contact person at consultant and contractor levels • Consolidating Project related grievances from all different GM levels • Informing the PIU and the management about the resolution process • Preparing consolidated GM reports of the Project
Environmental Specialist (PIU)	<ul style="list-style-type: none"> • Monitoring the project's progress • Ensuring the successful delivery of all defined documentation

	<ul style="list-style-type: none"> • Consolidated reporting on overall SEP activities and the project progress • Implementing social and environmental monitoring • Monitoring and reporting to the PIU and management whether the social and environmental issues stated in related documents are implemented throughout the Project's lifetime
	<ul style="list-style-type: none"> •
Procurement Specialist	<ul style="list-style-type: none"> • Providing consultancy in tenders to be held within the scope of the Project. • Ensuring that the GM and the other environmental and social instruments are incorporated into the tender documents • Preparing English and Turkish copies of the tender documents
Supervision Consultant	<ul style="list-style-type: none"> • Preparing of respective E&S instruments (ESMP, ESMP Checklist, RF, RP, OHS Plan, etc.) for the project activities • Ensuring that the project adheres to the methodology and other requirements which are mentioned in E&S Documents (ESMP, SEP and RP) during the implementation of sub-projects • Monitoring the contractors' activities on site (including recording and resolution of grievances, and reporting these to PIU in their monthly progress reports) • Contacting with PIU GM Contact Person for the follow-up of the grievances

8. GRIEVANCE MECHANISM

The Grievance Mechanism (GM) is an arrangement that enables any stakeholder to submit their grievances/concerns/suggestions on how the project is planned, constructed, or implemented.

To achieve transparency and accountability and meet the related standards of WB, a project specific Grievance Mechanism (GM) will be established and will be implemented during the project life cycle.

The goal of the GM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express their concerns and grievances related to project activities. The GM is a mechanism that allows also for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on their resolution process. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

Within the scope of the TERRP, grievances/concerns/suggestions will be handled at multiple levels: (a) Contractor (b) Construction Supervision (c) Provincial Directorates of Environment, Urbanization and Climate Change (d) MoEUCC/Project Implementation Unit (PIU), (e) national level through existing GMs of Republic of Turkiye.

- a. Contractor: Each contractor appointed for conducting the civil works will be responsible for receiving, recording and if possible, resolving the concerns and grievances raised by any stakeholder (right holders, local communities, project workers, etc.) due to the civil works executed within the scope of the TERRP. The PIU will also require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, before the start of work. If the Contractor is not able to resolve the concerns and grievances, they are obliged to direct them to the relevant person/institutions. Contractors will also submit the records including solved and unsolved concerns and grievances to the PIU on weekly basis.
- b. Supervision Consultant: The concerns and grievances that cannot be addressed by the contractor will be dealt with by the Project Manager who is appointed as Supervision Consultant. The Project Manager will remind the responsibilities of the contractor by issuing a status report and ensuring that necessary measures are/will be taken to solve the problem and ensure the implementation of required corrective actions. If the Project Manager is not able to resolve the concerns and grievances, he/she is obliged to direct them to the PIU.
- c. Provincial Directorates of Environment, Urbanization and Climate Change: PDoEUCC will be responsible for taking the necessary measures to address received concerns and grievances regarding the activities carried out within the scope of the TERRP to the extent possible. The Directorates will also immediately forward all received concerns and grievances to the PIU, whether the issues are addressed or not.
- d. MoEUCC/PIU: Within the scope of the TERRP, MoEUCC is responsible to collect, record, and resolve all concerns and grievances raised by stakeholders through the above-mentioned levels. MoEUCC is responsible for resolving the collected concerns and grievances within 15 days and informing the owner of the concerns and grievances about the result.
- e. National Level. Turkiye has different GMs available at national level for all individuals residing in the country: Presidency's Communication Center, Foreigners Communication Center (YIMER). The details and communication channels of these mechanisms are provided in the following sections.

8.1. PIU LEVEL GM

The MoEUCC/PIU will operate a website for TERRP where all relevant information is being disclosed for public opinion and review. Through the complaint submissions section and e-mail address (yigmkadev@csb.gov.tr) that will be available on the website, the PIU will be able to collect grievances from all stakeholders. The principle of confidentiality and the right to make anonymous complaints will be

ensured. The communication channels for the project specific GM will be provided in the SEP once it is established.

Grievance/concern/suggestions collected through different channels will be recorded by the MoEUCC and responded to within 15 days. Records of the grievance/concern/suggestion will be shared with WB through the Monitoring Report regularly.

Any comments or concerns can be brought to the attention of the Contractor verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on construction sites that are easily accessible to all relevant stakeholders. The principle of confidentiality and the right to make anonymous complaints will be enabled.

The following timeframe will be used by the Contractor, Supervision Consultant, and MoEUCC/PIU:

- Written acknowledgment of receipt of the grievance: within 5 days of receiving the grievance,
- Proposed resolution: within 30 days of receiving the grievance.
- Specifically, nominated, and trained members of staff will record grievance information in a grievance log. This will include:
 - Stakeholder name and contact details. (Personal details will not be shared by third parties or disclosed)
 - Details of the grievance and how and when it was submitted, acknowledged, responded to, and closed out.

The Grievance Form for the construction phase of the project (Annex 1) will be revealed on the:

- Websites of the GDCA and/or relevant government authorities, where the project activities will be implemented, and
- Available printed copies on the premises of the relevant buildings/government authorities (when the construction work activities will start) and the premises of the local communities, located near the project areas.

The grievance log will have all the necessary elements to disaggregate the grievance by gender of the person submitting it as well as by type of grievance. Each grievance will be verified in the registry with the following information: a) description of grievance, b) date of receipt of the grievance and when acknowledgment returned to the complainant; c) description of actions taken (investigation, corrective measures, and preventive measures); d) date of resolution and closure provision of feedback to the complainant.

In cases when the grievance/complaint is indefinite or not clear enough, the PIU will assist and provide advice in formulating/redrafting the submission, for the grievance/complaint to become clear, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project.

If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 30 calendar days upon the acknowledgment of the grievance. In the situation when the PIU is not able to address the particular issue verified through the grievance mechanism or if action is not required, PIU will provide a detailed explanation/ justification to the complainant on why the issue was not addressed. The response will also contain an explanation of how the person/ organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory. At all times, complainants may seek other legal remedies by the legal framework of the Republic of Türkiye, including formal judicial appeal.

The GDCA has developed its Grievance Procedure for their on-going World Bank financed projects which is provided in ANNEX 5.

8.2. NATIONAL LEVEL GM

In addition to the above-mentioned communication channels, the stakeholders may also utilize the national level GMs.

8.2.1. PRESIDENCY’S COMMUNICATION CENTER (CIMER)

The CIMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

Webpage	www.cimer.gov.tr
Call Center	150
Phone Number	+90 312 525 55 55
Fax Number	+90 312 473 64 94
Mail Address	Republic of Türkiye, Directorate of Communications

Individual applications at the community relations desks at governorates, ministries and district governorates

8.2.2. FOREIGNERS COMMUNICATION CENTER (YIMER)

The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

Webpage	www.yimer.gov.tr
Call Center	157
Phone Number	+90 312 157 11 22
Fax Number	+90 312 920 06 09
Mail Address	Republic of Türkiye, Directorate of Communications

Individual applications at the Republic of Türkiye General Directorate of Migration Management

8.3. 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> . Project affected communities or individuals can also raise their grievances to the World Bank Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

8.4. WORKERS' GM

A separate grievance mechanism will be available for the workers, through which they will be able to report working conditions, financial, child/forced labor, legal issues, and other issues such as gender-based discrimination in the workplace, with special attention to sexual harassment. Specifically building awareness and a GM hotline for gender-based violence (GBV) and abuse in the workplace for female workers (both at the construction site and in the buildings under the project) will be emphasized. There will also be awareness-raising discussions with both men and women regarding appropriate workplace behavior.

The MoEUCC/PIU and Supervision Consultant will develop and implement a grievance mechanism for their workforce including sub-contractors, before the start of work. The workers' grievance mechanism will include; (i) a procedure describing the flow of the GM, (ii) timeframes to respond to grievances and to resolve cases, (iii) a register sheet to record and track the timely resolution of grievances; (iv) a contact person responsible to receive, record, address and track resolution of grievances. The workers of the Consultant and Contractor will apply to PIU for their grievances through the project website.

The Supervision Consultant and Contractors will record, and solve the grievances of workers and report to PIU in monthly progress reports. The process will be monitored by the GM Contact person in the MoEUCC. PIU will also record and resolve the grievances of its employees and compile all data gathered from different levels (Supervision Consultants and Contractors) in a central log.

The workers will be informed about the existence of the grievance mechanism which will be available to all project workers (direct and contracted; including the PIU staff) through notice boards, the presence of "suggestion/complaint boxes" at the site, and other means as needed. Besides, the workers' grievance mechanism will be described during the staff induction trainings, which will be provided to all project workers.

The mechanism will be based on the following principles:

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

Information about the existence of the workers' grievance mechanism will be available to all project workers (direct, contracted,) through notice boards, the presence of "suggestion/complaint boxes" at the call center, announcements during training, seminars, meetings, access link on the main page of project website, project printed materials that will be distributed to workers, social media and other means as needed. The Project grievance mechanism will not prevent project workers to use other judicial or administrative remedies available under the law.

The project and workers' grievance mechanism will be established by Project effectiveness.

GDCA will develop and adapt its current grievance and complaints procedures and mechanisms for the project's necessities. The PIU will be responsible for managing the grievance mechanism and responding to grievances and complaints received in the scope of the Project.

In addition, the project GM will include a channel to receive and address confidential complaints related to Sexual Exploitation, Abuse/Sexual Harassment, and lack of Covid-19 measures with special measures in place.

8.5. MANAGEMENT OF SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARASSMENT ISSUES

Although the risk from project activities is moderate, the grievance mechanism will include handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints. The GM that will be in place for the project workers will also be used for addressing SEA/SH related issues and will have in place mechanisms for confidential reporting, with safe and ethical documenting of SEA/SH issues.

The project GM will include a channel to receive and address confidential complaints related to SEA/SH, with special measures in place. If an employee faces SEA/SH issue s/he can either apply to a higher-level superior or go directly to the police, as stipulated in the national referral system of the country for dealing such cases. The content and procedures of the project's GM will also have a reporting line on such cases in regard to SEA/SH issues and will be handled under full confidentiality and with the consent of the survivor. If the MoEUCC PIU will receive a SEA/SH related grievance, these grievances will be directed to national referral systems immediately and will be recorded. All details of the complainant of the sensitive case will be kept strictly confidential.

8.6. GM PROCEDURE

8.6.1. GRIEVANCE LOG

The PIU's Social Expert and contact person will keep a central log and will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The log should contain the following information:

- Owner of the complaint, his/her location, and details of his/her complaint,
- Date of reporting by the complainant,
- Date when the Grievance Log was uploaded onto the project database,
- Details of corrective action proposed, name of the approval authority,
- Date when the proposed corrective action was sent to the complainant (if appropriate),
- Date when the complaint was closed out,
- Date when the response was sent to the complainant.

The Supervision Consultant and the Contractor will maintain local grievance logs to ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

- Type of appeal,
- Category of appeal,
- People responsible for the execution of the appeal,
- Deadline for resolving the appeal,
- Agreed action plan.

a. MONITORING AND REPORTING ON GRIEVANCES

Monitoring and evaluation of the stakeholder process are important to ensure PIU can respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. The following characteristics/commitments/activities will assist in achieving successful engagement:

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

PIU will prepare Monitoring Reports to be submitted to WB in 6 months periods.

The supervision Consultant will be responsible for:

- Collecting data from the Contractors on the number, substance, and status of complaints and uploading them into a single regional database,
- Maintaining the grievance logs on the complaints received at the regional level,
- Monitoring outstanding issues and proposing measures to resolve them, and
- Submitting quarterly reports on GM to the PIU.

PIU within the GDCA will submit biannual reports to the WB, which shall include a section related to GM including updated information on the following:

- Status of GM implementation (procedures, training, public awareness campaigns, budgeting, etc.),
- Qualitative data on the number of received grievances (applications, suggestions, complaints, requests, positive feedback), highlighting those grievances related to the WB ESS 2 and the number of resolved grievances,
- Quantitative data on the type of grievances and responses, issues provided, and grievances that remain unresolved,
- Level of satisfaction by the measures (response) taken,
- Any correction measures are taken.

The PIU's Social Expert will be responsible for:

- Summarizing and analyzing the qualitative data received from different levels 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.

The PIU will be the focal point for GM and be responsible for the monitoring of all Project related stakeholder engagement activities, ensuring the fulfillment, and updating of this SEP, and reporting to the stakeholders.

ANNEX 2. GRIEVANCE FORM

Reference No	
Full Name (not mandatory, you can submit anonymously)	
Please mark how you wish to be contacted (by mail, telephone, or e-mail).	
Province/District/ Location	
Date	
Category of the Grievance	
1. On abandonment (public)	
2. On assets/properties impacted by the project	
3. On infrastructure	
4. On decrease or complete loss of sources of income	
5. On environmental issues (ex. pollution)	
6. On Employment	
7. On traffic, transportation, and other risks	
9-Other (Please specify):	
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?	
What would you like to see happen to resolve the problem?	

Although giving a name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance, some problems may occur due to a lack of information.

Signature:

Date:

ANNEX 3. GRIEVANCE CLOSEOUT FORM

Grievance closeout number:	
Define immediate action required:	
Define long-term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <input type="checkbox"/> NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and/or his/her complaint has been remediated.

Notes:

[Name-Surname and Signature]

Date: ___ / ___ / _____

Of the Complainant:

Representative of the Responsible Institution/Company
[Title-Name-Surname and Signature]

ANNEX 4. GRIEVANCE LOG

Grievance and Suggestion Register Number	Details on Grievance/Suggestion In-Take Channel				About the Complainant				About the Complaint/Suggestion				Action Taken				Supporting Documents for Grievance/Suggestion Close-Out	Please provide details If the Complaint could not be Closed/Resolved (referral was made to another institution/person etc.)		
	How Complaint is Received (Grievance Form, Community Meeting, Telephone, Alo 181, etc.)	Date of Complaint Received	Person Receiving Complaint/Suggestion Name/Surname and Position Level of Grievance (Contractor, MoEUCC Provincial Directorate Level, PIU Level, Ministerial Level, etc.)	Level of Grievance (contractor, supervision consultant, provincial directorates, Ministry, Alo 181, etc.)	Name and Surname of the Complainant*	Gender of the Complainant	Complainant's E-mail*	Complainant's Phone Number*	Province in which the C/S is Relevant	Building/Institution Related to Complaint/Suggestion (Sub-Project)	Project Component Related to Complaint/Suggestion	Complaint Category (Renovation-related, environmental issues, restriction of access to building entrances, damage, complaints about workers, accidents, working conditions, employee rights, sexual exploitation and abuse, sexual harassment, etc.)	Summary of Complaint/Suggestion	The date when the complainant is informed that the complaint/suggestion has reached the system and is under evaluation	Status of the Complaint Open, Closed, Pending	Person/Department to whom Complaint/Suggestion is directed	Action Planned		Due Date for Addressing the Grievance	Closed Date of Grievance

ANNEX 5. EXISTING GDCA GRIEVANCE MECHANISM

Introduction

The Grievance Mechanism (GM) is a process that enables any stakeholder to submit a complaint or a suggestion about how the project is being planned, constructed, or implemented.

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and cooperation, which forms an integral part of the more detailed community consultations that will pave the way for corrective action, as well as builds stakeholder engagement and ownership of the project. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Supports accessibility, anonymity, confidentiality, and transparency in handling complaints and grievances; and
- Reduces the need to resort to judicial proceedings.

The operational flow of the Grievance Mechanism for the stakeholders is given in Figure 6.



Figure 6. Operational Flow of Grievance Mechanism

The overall process for the GM usually is described in detail in the Project Operational Manual (POM) and is 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.

Purpose

The GM can be used to enable the stakeholders to raise any type of requests (complaints, compliments, feedback, inquiries for information, etc.) related to the overall management and implementation of the project, as well as issues about services 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, abuse or any misbehavior/misconduct [including sexual exploitation and abuse/sexual harassment (SEA/SH)]¹² in the workplace),
- disputes relating to resource use restrictions that may arise between or among affected communities, and
- grievances that may arise from members of communities who are dissatisfied with the project activities, or actual implementation of the project.

General feedback, questions, suggestions, and compliments: The Project Implementation Unit (PIU) of the Ministry of Environment, Urbanization and Climate Change (MoEUCC) established a transparent and comprehensive project-level GM to resolve and administer the requests that could be encountered during the renovation of public buildings as well as to address other social issues on the transfer of staff and relocation once the public buildings are operational if needed.

The individuals and communities directly or indirectly affected or likely to be affected by the Project may have concerns regarding the actual benefits or the temporary impacts of renovation. In this respect, the mechanism will allow overall public communities to express their concerns and requests. The GM will establish clearly defined timelines for acknowledgment, update, and final feedback to the complainant.

These timelines will be disseminated widely to Project stakeholders.

Scope

The GM will be accessible to a wide range of Project stakeholders who are likely to be directly or indirectly affected by the Project. These will include beneficiaries, staff (including PIU members), administrations, users of reconstructed housing and the wider public, and project implementers (Supervision Consultants, contractors, etc.). All of them will be encouraged to submit their complaints and feedback to the GM. In addition, care will be taken to ensure that the grievance mechanism is accessible to vulnerable groups.

Responsible Parties

Ministry of Environment, Urbanization and Climate Change/Project Implementation Unit (MoEUCC/PIU) would assume overall responsibility for the GM and serve as the main implementing agency. For this mechanism to function in a proper and timely manner, PIU will also assign a GM contact person.

The GM contact person who will oversee the entire process will be assigned as a part of the project team of the MoEUCC. GM's Contact Person (Social Expert) will also be responsible for reporting the grievance redress process of the project for monitoring purposes. This person will also be responsible to coordinate the GM to ensure its smooth functioning within the scope of the project.

Table 7 presents the responsible parties and their roles/responsibilities for the GM implementation.

Table 7. Responsible Parties in Grievance Mechanism Implementation at Each Defined Level

Responsible Party	Responsibilities
Ministry of Environment, Urbanization and Climate Change/Project	<ul style="list-style-type: none"> • The PIU will be responsible for the overall implementation, management, and coordination of this Standard Operating Procedure (SOP). • PIU will also guide and assist the relevant responsible parties to ensure the successful implementation of this SOP.

¹² Measures to be taken in the context of the consent of the survivor in the future complaints on sensitive issues such as this will be carried out on the basis of the principle of confidentiality and by putting the safety of the survivor at the center.

Implementation Unit (MoEUCC/PIU)	<ul style="list-style-type: none"> PIU will be responsible for continuous monitoring of each process of the stakeholder's requests to assure compliance with the GM Procedure.
GM Contact Person of the PIU	<ul style="list-style-type: none"> Acting as the GM contact person in the PIU. Reviewing, and classifying whether the grievances are genuine/eligible and related to Project activities or not together with relevant member(s) of the PIU. Establishing the main register and monitoring system for this SOP and following up on all grievances relevant to the Project. Managing and coordinating the resolution of grievances within the Project. Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding stakeholder engagement and other Project activities and coming up with actions. Coordinating and monitoring the GM contact persons at the Contractor level. Consolidating Project related requests received from different GM levels. Informing the PIU and the management about the resolution process. Preparing consolidated GM reports of the Project.
GM Contact Person of the (Provincial Directorate of Ministry of Environment and Urbanization (PDoMoEUCC)	<ul style="list-style-type: none"> Receiving project-related requests (complaints, compliments, feedback, inquiries for information, etc.). Evaluating and addressing the complaints that fall into their area of responsibility by taking confidentiality and security measures. Recording each request whether they are addressed or not on the register and monitoring system and convey the register log to the MoEUCC on monthly basis. Immediately notifying the MoEUCC/PIU if complaints have great significance (sexual abuse, workplace accident, etc.).
Social Specialists Supervision Consultants	<ul style="list-style-type: none"> Evaluating and addressing the received applications together with the Contractor's Social Specialist/OHS Specialist or if deemed necessary the management of the contractors' and the Project Managers (of supervision consultants) will involve in the resolution process of the applications. Monitoring the contractors' recording and resolution of grievances and reporting these to PIU in their monthly progress reports.

Dissemination of the Grievance Mechanism

MoEUCC will provide leaflets and other means of information (official letters, notice boards, the official website of MoEUCC, consultation meetings, etc.) to inform the communities about the project, project activities to be carried out, and renovation/retrofitted of the public buildings.

The Grievance/Suggestion Form for the project will be publicly available on the project website, on the webpage of the relevant government institutions, and the construction sites of the sub-projects.

MoEUCC/PIU will also conduct some GM consultation meetings with representatives of the beneficiaries, the supervision consultants, and contractors.

During the implementation of the Project, once the civil works commence, printed copies of the Grievance/Suggestion Form will also be available in the buildings/government authorities included in the Project and at the PDoEUCCs.

Submission of a Request

Who May Use the Grievance Mechanism?

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

- Project’s beneficiaries;
 - The staff of PV Panel installed buildings (teachers, healthcare professionals, and contracted workers at the buildings, etc.)
 - Beneficiaries of PV Panel installed buildings (students, patients, visitors, and their families, etc.)
- Communities that could potentially be affected by the construction/renovation/retrofitted activities at the buildings (visitors, surrounding residences, etc.)
- Employees of Contractors and Supervision Consultants
- Members of the PIU
- Other parties (NGOs, etc.)

The GM will allow anonymous applications through its different request/suggestion/grievance intake channels established within the scope of the project. In case, the request/suggestion/grievance is submitted anonymously, the same process will be followed as a non-anonymous request. However, since no contact information can be recorded in anonymous requests/suggestions/grievances, the applicants should be informed that information on how the grievance process will end cannot be transmitted.

How to Submit a Request?

The Ministry of Environment, Urbanization and Climate Change (MoEUCC) have a hotline `Alo181` which is accessible via phone and website. This hotline serves also as a ministerial-level grievance mechanism for its employees, partners, and the wider public. Requests/suggestions/grievances about all environmental and urban services provided by MoEUCC are responded to by a professionally managed call center.

The applicants can submit their request/suggestion/grievance in any of the ways NGOd below:

MoEUCC Call Center	Alo 181
Telephone	+ 90 312
Grievance Forms	
E-mail	yigmkadev@csb.gov.tr
Provincial Directorates of Environment, Urbanization And Climate Change (PDoEUCC)	Alo 181 TERRP Grievance Forms are disclosed on the official webpage of the respective PDoEUCC.
Contractors	Forms that are available at construction sites (Annex 1-2)

In addition to the above-mentioned communication channels, the stakeholders may also utilize the Presidency's Communication Center (CIMER) to submit their concerns and grievances about the project implementation. The communication channels of CIMER are given below.

Grievance Mechanism Process

Webpage <https://www.cimer.gov.tr>
<https://giris.turkiye.gov.tr/>

Hotline Alo 150

Phone +90 312 590 2000

Fax +90 312 473 6494

Within the scope of the TERRP, requests/suggestions/grievances will be handled at different levels: (a) contractor level; (b) construction supervision level; (c) MoEUCC Provincial Directorates level; (d) national level MoEUCC Project Implementation Unit (PIU).

- a) **Contractor Level:** Each contractor appointed for conducting the civil works will be responsible for receiving, recording and if possible, resolving the concerns and grievances raised by any stakeholder (public building management, building users, visitors, host communities, or beneficiaries, project workers, etc.) due to the civil works executed within the scope of the TERRE Project. The PIU will also require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, before the start of work. If the Contractor is not able to resolve the concerns and grievances, they are obliged to direct them to the relevant person/institutions. Contractors will also submit the records including solved and unsolved concerns and grievances to the MoEUCC on weekly basis.
- b) **Construction Supervision Level:** The concerns and grievances that cannot be addressed at the contractor level will be dealt with by the Project Manager who is appointed as Construction Controller. The Project Manager will remind the responsibilities of the contractor by issuing a status report and ensuring that necessary measures are/will be taken to solve the problem and ensure the implementation of required corrective actions. If the Project Manager is not able to resolve the concerns and grievances, he/she is obliged to direct them to the MoEUCC.
- c) **Provincial Directorates of Environment and Urbanization Level:** Provincial Directorates of Environment and Urbanization will be responsible for taking the necessary measures to address received concerns and grievances regarding the activities carried out within the scope of the TERRE Project to the extent possible. The Directorates will also immediately forward all received concerns and grievances to the Administration, whether the issues are addressed or not.
- d) **MoEUCC Level:** Within the scope of the TERRE Project, MoEUCC is responsible to collect, record, and resolve all concerns and grievances raised by stakeholders through the above-mentioned levels. MoEUCC is responsible for resolving the collected concerns and grievances within 30 days and informing the owner of the concerns and grievances about the result.

Registration

The requests/suggestions/grievances raised by any stakeholder (including but not limited to; workers of the TERRE Project, public building management, building users, visitors, surrounding residents, or beneficiaries, etc.) due to the executed civil works will be logged in the Grievance Table (Annex 2) within 3 business days from the date of receipt by PIU, Consultants, and PDoEUCC.

The grievance contact person (supervision consultant and PDoEUCC) may delegate responsibilities to other staff, but is ultimately responsible for:

- Investigating the grievance,
- Consulting relevant technical persons within the project,
- Defining and implementing resolution actions,
- Making sure resolution actions are completed,
- Tracking the progress of individual grievances,
- Informing the Complainant once the grievance is registered in the system and then when the grievance is resolved,
- Documenting resolution actions, and
- Gaining necessary approvals from and reporting to relevant management.

The anonymous grievances will be logged and reported with other grievances to facilitate continuous improvement of the GM and project implementation. To ensure the confidentiality and life safety of the survivor's identity info, necessary measures will be taken to log in to the system (where the complaint mechanism is followed) with a username and password, especially in cases of gender-based violence, sexual exploitation, and harassment.

The Supervision Consultant and PDoEUCC will record the request/suggestion/grievance through the Grievance/Suggestion Form and the Grievance Close-Out Form (provided in Annex 1 and 2 respectively). Verbal requests/suggestions/grievances will be recorded by the responsible personnel of the Supervision Consultant and PDoEUCC by filling out the Grievance and Suggestion Form. The Supervision Consultant is obliged to send the record of the request/suggestion/grievance to the PIU on monthly basis.

Grievance Registration Process of Alo 181

Headquarter of Alo 181 has been informed about the TERRE Project and it currently receives, and records all inquiries received on TERRE Project and conveys them to the PIU of the TERRE Project. The officer of ALO 181 will record the grievance and will ask the complainant if a response is requested or not. If the complainant requests feedback about the result of her/his complaint, then the complainant is asked to provide her/his phone or e-mail information. Even if the complainant would prefer to stay anonymous, her/his complaint is recorded by the representative of Alo 181. Thereafter, all types of recorded complaints will be sent to the relevant department of MoEUCC.

Assessment, Addressing, and Closure Process of the Requests

The complaints will be registered within three (3) business days from the date of receipt. During these three (3) days, grievances will be reviewed to be classified whether they are genuine and related to Project activities or not by the responsible person. If the issues/disputes raised are not related to the Project, guidance is provided to the Complainant to contact the relevant party.

The requests will be addressed, and corrective actions will be taken to resolve the complaint within *15 working days*. If the resolution period takes more than 15 days (the resolution period will take a maximum of 30 calendar days) this should be agreed upon between the Supervision Consultant/PIU and the complainant. The applicant should be informed about the closure of the request.

All parties of GM are responsible for assigning a grievance owner to liaise with the stakeholder/s and work on a resolution. Grievances will be screened to determine who the responsible party for further assessment will be and how the grievance is approached. Steps to be taken for assessing, addressing, and closing the request at each level of GM are provided in Table 15.

Table 15. Steps to be taken for Assessing, Addressing, and Closing the Request for all parties of GM

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
Contractor Level	If an answer/ corrective action can be provided immediately	Social Specialist of the Contractor	<p>If the complaint is verbal, it will be recorded in Grievance/ Suggestion forms (this action will be taken for all types of grievances).</p> <p>The social specialist will draft a response with explanations of corrective actions.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p>	Management of Contractor	<p>If the complainant is satisfied with the answers and actions are taken, the Close- Out Form with corrective actions and explanations will be signed by the complainant.</p>	<p>Further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> • A site visit would be held to collect more information about the issue/dispute, if appropriate. • A virtual or face-to-face meeting would be conducted with the complainant in order to propose another corrective action, if possible. • The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p>If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant.</p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> • CIMER • Civil Courts of First Instance • Administrative Court • Commercial Courts of First Instance • Labor Courts • Ombudsman https://ebasvuru.ombudsman.gov
	If it cannot be ensured whether the complaint is eligible or not	Management of Contractor	<p>Further-assessment will be made by the management.</p> <p>If the management decides the grievance is relevant to TERRE Project activities and is eligible for assessment, the Social Specialists of the Contractor will assess the application and will draft a response to the Complainant with explanations and corrective actions to be taken.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p> <p>If the management decides the complaint is NOT relevant to TERRE Project activities, the Complainant will be informed; accordingly, guidance will be provided to contact the relevant party(-ies).</p>	Management of Contractor	<p>If the complainant is satisfied with the answers and actions are taken, the Close- Out Form with corrective actions and explanations will be signed by the complainant.</p>	<p><u>If the complaint is eligible and there is disagreement, then</u> <u>further assessment will be taken by the PIU.</u></p> <ul style="list-style-type: none"> • A site visit would be held to collect more information about the issue/dispute, if appropriate. • Virtual or face-to-face meetings would be conducted with the complainant in order to propose another corrective action, if possible. • The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p>If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant.</p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> • CIMER • Civil Courts of First Instance • Administrative Court • Commercial Courts of First Instance • Labor Courts • Ombudsman https://ebasvuru.ombudsman.gov
	If the submitted grievance or concern is indefinite or is not clear enough	Social Specialist of the Contractor	<p>Social Specialists of the Contractor will assist and provide advice in formulating/ redrafting the submission, to ensure that the grievance is clear enough for assessment in the best interests of persons affected by the Project.</p> <p>After necessary revisions are made to the complaint to ensure it is detailed enough for assessment and the complaint is assessed; feedback including necessary actions taken will be sent to the complainant.</p>	Management of Contractor	<p>If the complainant is satisfied with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.</p>	<p>Once the submitted request is clarified to be assessed under the Project's GM and if there is still a disagreement with the actions taken, <u>further assessment will be taken by the PIU.</u></p> <ul style="list-style-type: none"> • A site visit would be held to collect more information about the issue/dispute, if appropriate. • A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible. • The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p>If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant.</p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> • CIMER • Civil Courts of First Instance • Administrative Court • Commercial Courts of First Instance • Labor Courts • Ombudsman https://ebasvuru.ombudsman.gov
	If the issues/disputes are related to the project but cannot be addressed at the contractor level	Management of Contractor and Project Manager of the Supervision consultant	<p>Draft assessment will be sent to the GM contact person of the PIU by the Supervision Consultant.</p> <p>Considering the draft assessment shared by the Supervision Consultant, the GM contact person of the PIU will draft a response with explanations and corrective actions to be taken.</p>	PIU/MoEUCC	<p>If the complainant is satisfied with the explanation provided and actions are taken, the Close-Out Form with corrective actions and</p>	<p>If there is still a disagreement with the actions taken, <u>further assessment will be taken by the PIU.</u></p> <ul style="list-style-type: none"> • A site visit would be held to collect more information about the issue/dispute, if appropriate. • A virtual or face-to-face meeting would be conducted with the complainant in order to propose another corrective action, if possible. • The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. 	<ul style="list-style-type: none"> • CIMER • Civil Courts of First Instance • Administrative Court • Commercial Courts of First Instance • Labor Courts

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
			The final response will be prepared and shared with the complainant.		explanations will be signed by the complainant.	If the agreement is ensured , the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution , s/he will be informed about the appeal process.	<ul style="list-style-type: none"> • Ombudsman https://ebasvuru.ombudsman.gov
	When a contractor's worker issues a complaint	Social Specialists of the Contractor	<p>The complaint will be directed to the management of the contractor.</p> <p>The Project manager of the supervision consultant will be immediately informed about the grievance received.</p> <p>If the grievance can be resolved immediately, the Contractor will identify and take necessary actions. If not, the grievance will be escalated to the Supervision Consultant and/or the PIU for necessary actions to be identified and taken.</p> <p>If the grievance is repetitive, extensive, and high-profile that may jeopardize the Project or the reputation of the Bank then the grievance will be escalated to the PIU and necessary actions to be taken will be identified.</p> <p>The response with the appropriate solution and actions to be taken will be prepared and shared with the complainant.</p>	Project Manager of Supervision Consultant	If the worker is satisfied with the explanation provided and actions are taken , the Close-Out Form with corrective actions and explanations will be signed by the complainant.	<p>In case of disagreement, the complaint will be directed to the PIU.</p> <p>PIU will organize a meeting with the worker to further assess potential corrective actions that can be taken and additional information to be provided, as appropriate.</p> <p>If the worker is still dissatisfied with the recommended additional actions or explanation, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> • CIMER • Civil Courts of First Instance • Administrative Court • Commercial Courts of First Instance • Labor Courts • Ombudsman https://ebasvuru.ombudsman.gov
Supervision Consultant	When Supervision Consultant's worker issue a complaint	Project Manager and/or headquarter of Supervision Consultant	<p>If the grievance can be resolved immediately, the Project Manager or the HQ of the Supervision Consultant will identify and take necessary actions. If not, the grievance will be escalated to the PIU for necessary actions to be identified and taken.</p> <p>If the grievance is repetitive, extensive, and high-profile that may jeopardize the Project or the reputation of the Bank then the grievance will be escalated to the PIU and necessary actions to be taken will be identified.</p> <p>The response with the appropriate solution and actions to be taken will be prepared and shared with the complainant.</p>	Project Manager of Supervision Consultant PIU/MoEUCC	If the worker is satisfied with the explanation provided and actions are taken , the Close-Out Form with corrective actions and explanations will be signed by the complainant.	<ul style="list-style-type: none"> • A virtual or face-to-face meetings would be conducted with the worker to discuss, propose and agree on any other correction actions. • If the agreement is ensured, the proof documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the worker. • If the worker is still dissatisfied with the recommended actions of explanation, s/he will be informed about the appeal process. 	<ul style="list-style-type: none"> • CIMER • Civil Courts of First Instance • Administrative Court • Commercial Courts of First Instance • Labor Courts • Ombudsman https://ebasvuru.ombudsman.gov
Provincial Directorate of EUCC	If the complaint is related to the activities of an ongoing sub-project	Contact person of the PDoEUCC	<p>In case an answer/corrective action can be taken immediately; the responsible person will take the required corrective action to resolve the grievance and inform the PIU/MoEUCC about the grievance and the corrective action taken via GM Register Table.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p>	The contact person of the PDoEUCC	If the complainant is satisfied with the explanation provided and corrective actions are taken, the Close-Out Form including the corrective actions and explanations will be signed by the complainant.	<p>If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUCC for further assessment.</p> <ul style="list-style-type: none"> • A site visit would be held to collect more information about the issue/dispute, if appropriate. • A virtual or face-to-face meeting would be conducted with the complainant in order to propose another correction action, if possible. • The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p>If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant.</p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> • CIMER • Civil Courts of First Instance • Administrative Court • Commercial Courts of First Instance • Labor Courts • Ombudsman https://ebasvuru.ombudsman.gov

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
PIU/MoEUC	When an answer/ corrective action can be provided immediately.	Contact Person of the PIU	<p>If the complaint is verbal, it will be recorded in an online Grievance & Suggestion form (this action will be taken for all types of grievances).</p> <p>Feedback including explanation and corrective necessary actions to be taken will be prepared and shared with the complainant by the GM contact person of the PIU.</p>	PIU/MoEUC	If the complainant is satisfied with the explanation provided and corrective actions are taken, the Close-Out Form including the corrective actions and explanations will be signed by the complainant.	<p>If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUC for further assessment.</p> <ul style="list-style-type: none"> A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p>If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant.</p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	If it cannot be ensured whether the complaint is eligible or not	PIU/MoEUC	<p>Further-assessment will be made by PIU/MoEUC.</p> <p>If the PIU & MoEUC decides the grievance is relevant to TERRE Project activities and is eligible for assessment, the PIU focal point will assess the application and will draft a response to the Complainant with explanations and corrective actions to be taken.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p> <p>If the PIU & MoEUC decides the grievance is NOT relevant to TERRE Project activities and is NOT eligible for assessment, the Complainant will be informed; accordingly, guidance will be provided to contact the relevant party(-ies).</p>	PIU Director	<p>Feedback including necessary actions taken will be sent to the complainant.</p> <p>If the complainant is satisfied with the answers and actions are taken, the Close-Out Form with corrective actions and explanations will be signed by the complainant.</p>	<p>If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUC for further assessment.</p> <ul style="list-style-type: none"> A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p>If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant.</p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	When the submitted grievance or concern is indefinite or not clear enough	GM Contact Person of the PIU	<p>The GM Contact Person of PIU (Social Specialist) will assist and provide advice in formulating/ redrafting the submission, to ensure that the grievance is clear enough for assessment in the best interests of persons affected by the Project.</p> <p>After necessary revisions are made to the complaint to ensure it is detailed enough for assessment and the complaint is assessed; feedback including necessary actions taken will be sent to the complainant.</p>	PIU Director	<p>If the complainant is satisfied with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.</p>	<p>Once the submitted request is clarified to be assessed under the Project's GM and if there is still a disagreement with the actions taken, further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p>If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant.</p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	When member/s of PIU issue a complaint	MoEUC General Directorate of Personnel	<p>The PIU member will submit their grievances to the General Directorate of Personnel with a petition.</p> <p>The General Directorate of Personnel will forward the grievance to any other department (rather than the "Internationally Funded Seismic Retrofitting Department") within the Ministry.</p>	General Manager of GDCA	<p>If the complainant is satisfied with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.</p>	<ul style="list-style-type: none"> If the complainant does not satisfy with the solution, s/he is informed about the appeal proses 	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
			<p>This department will select an "Assessor". Assessor will evaluate the grievance, make necessary inquiries, and reveal a summary report with corrective action(s).</p> <p>A summary report will be assessed by the Head of the Department of <i>Internationally Funded Seismic Retrofitting Department- General Directorate of Construction Affairs (IFSRDGDCA)</i>. General Manager will make a final decision and the complainer will be informed about the decision.</p>				

Contact persons will lead grievance investigation, when needed, which could include collecting relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, and other activities. Investigation findings will be used to document the decision-making process and inform proposed remedies.

Feedback

If the grievance has not been resolved, the GM's Contact Person (Social Specialist) of PIU will make a statement summarizing the corrective actions taken and inform the complainant of the resolution and other alternatives, if any, including legal alternatives.

Right to Appeal

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

- CİMER
- Civil Courts of First Instance,
- Administrative Court,
- Commercial Courts of First Instance
- Labor Courts, and
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr>)

World Bank Grievance Service

Individuals or communities who believe that they are adversely affected by the projects implemented by the Ministry of Environment, Urbanization, and Climate Change and financed by WB can send their complaints to the Ministry or the World Bank's Grievance Service (GS). (<https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>) GS ensures that the received grievances are quickly examined to eliminate project-related concerns.

Project-affected communities or individuals can also raise their grievances to the World Bank Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints.

Monitoring

As part of project progress reports, GM's effectiveness will be monitored, evaluated, and reported to the Bank regularly. The statistics of the grievances should be reported to the WB every six months in project progress reports.

Several Key Performance Indicators (KPIs) will also be monitored and integrated into the project progress report by the project regularly, including the following parameters:

- (i) Number of public grievances received within a reporting period (i.e. monthly);
- (ii) Number and percentage of those resolved within the prescribed timeline;

(iii) Number of grievances that are open more than 30 days with reasons explained;

Reporting

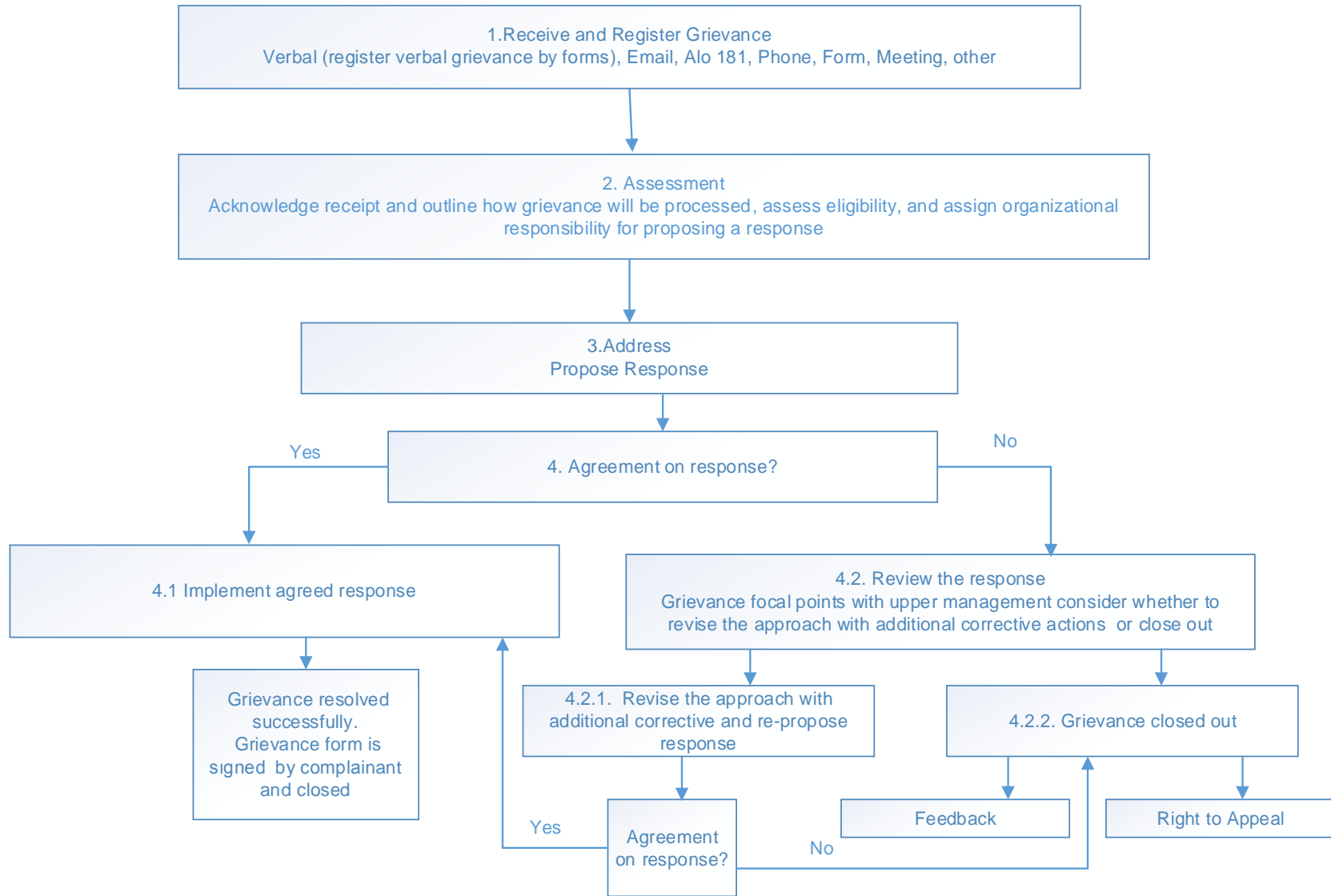
Responsible parties regarding GM reporting and requirements on reporting process are provided in Table 3.

Table 16: GM Reporting and Requirements on Reporting Process

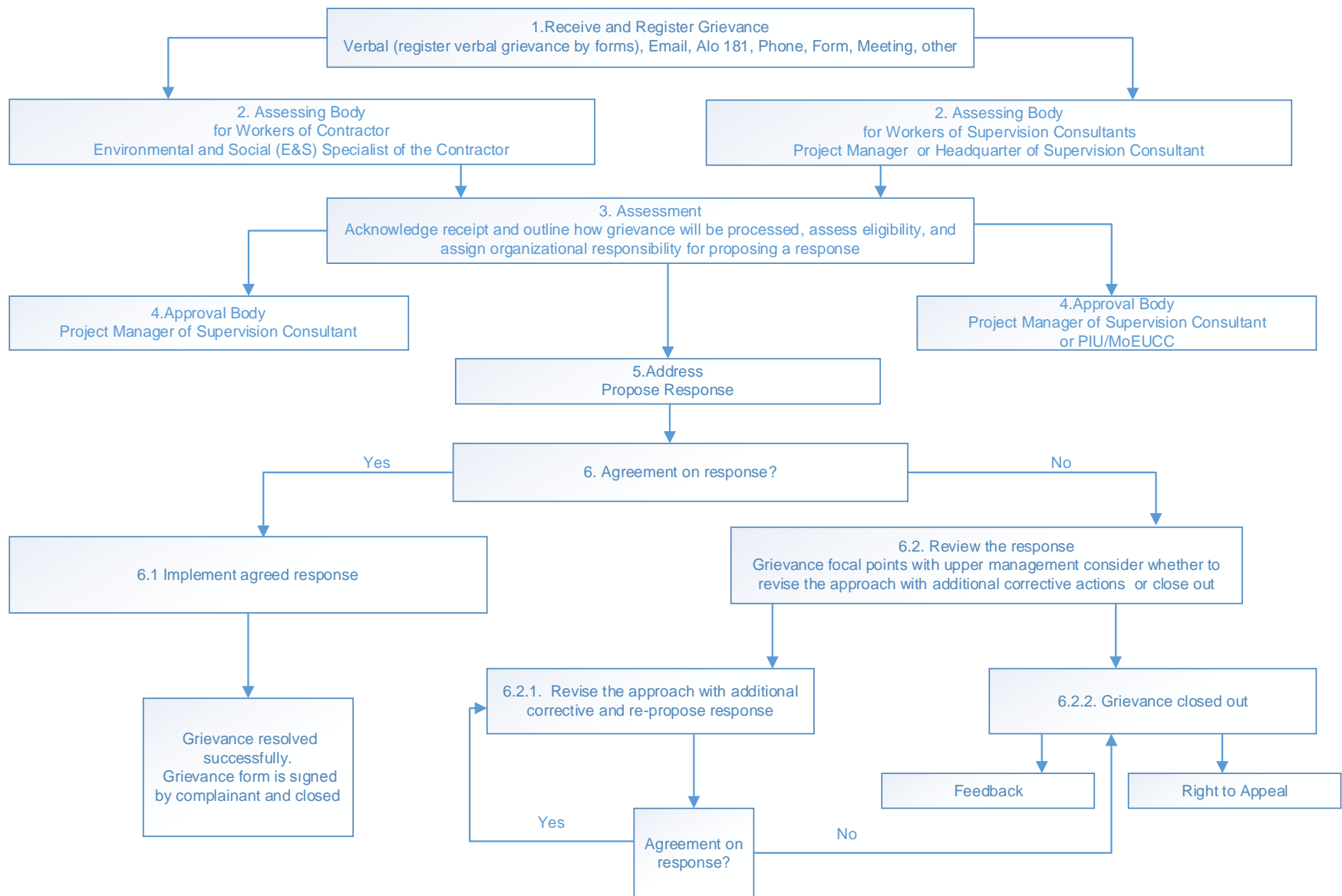
Responsible Party	Reporting Process Requirements
Social Specialists of the Contractor	Submit Monthly Reports to the Project Manager of Supervision Consultants, which shall include a Grievance Table as an annex related to GM including updated information on the following: <ul style="list-style-type: none"> • Quantitative data on the number of received applications (suggestions, complaints, requests, positive feedback), and number of resolved grievances, • Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, • Summary of corrective measures taken, • Disaggregated data (gender, province, etc.) about the received grievances.
Building Administration	Inform and update the PIU/MoEUCC/Project Manager of Supervision Consultant weekly, in case any grievances are submitted to the Building Administration and conveyed via CIMER.
Supervision Consultants	Submit Monthly Reports to the PIU, which shall include the contractor's report including, <ul style="list-style-type: none"> • Quantitative data on the number of received grievances (applications, suggestions, complaints, requests, positive feedback), and number of resolved grievances, • Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, • summary of corrective measures taken, • Disaggregated data (gender, province, etc.) about the received grievances.
PDoEUCC	Submit the Grievance Table to the PIU on weekly basis.
The PIU's GM contact person	Submit Quarterly Reports to the PIU, which shall include the following items related to the management of the received grievances, <ul style="list-style-type: none"> • Quantitative data on the number of received applications (suggestions, complaints, requests, positive feedback) from various intake channels (PDoEUCC, PIU, meetings, scorecards, Alo 181, online forms, etc.) and the number of resolved grievances, • Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, • Summary of corrective measures taken, • Disaggregated data (gender, province, etc.) about the received grievances.

MoEUCC/PIU	<p>Submit biannually reports to the WB, which shall include a Grievance Table as an annex (Annex 2) related to the GM including updated information on the following:</p> <ul style="list-style-type: none"> • Status of GM implementation (procedures, training, public awareness campaigns, budgeting, etc.), • Quantitative data on the number of received applications (, suggestions, complaints, requests, positive feedback), and the number of resolved grievances, • Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, • Summary of corrective actions taken, • Disaggregated data (gender, province, etc.) about the received grievances.

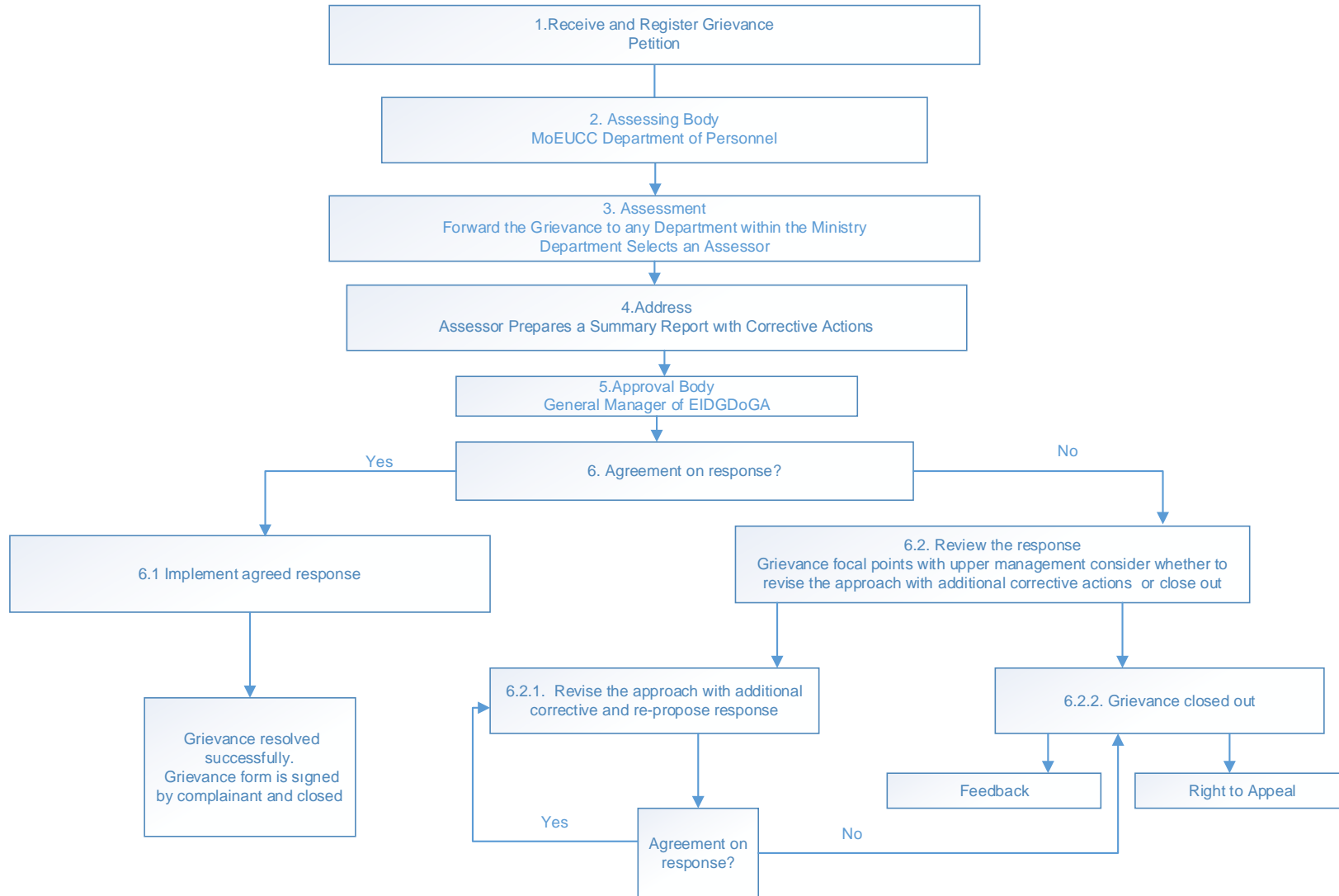
GRIEVANCE MECHANISM FLOWCHART



WORKERS' GRIEVANCE MECHANISM FLOWCHART



PIU GRIEVANCE MECHANISM FLOWCHART



ANNEX 6. Photos of the Meetings

Gaziantep, 27.02.2023



HATAY- Kırıkhan, Antakya, İskenderun, 28.02.2023





Hatay Centrum, 02.03.2023





Hatay, Defne-02.03.2023



Adiyaman, 02.03.2023



Karamanmaraş-05.03.2023



Malatya-07.03.2023





Malatya-Akçadağ-17.03.2023

