Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)
### BASIC INFORMATION

#### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turkey</td>
<td>P161670</td>
<td>Employment Support Project for Syrians under Temporary Protection and Host Communities</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Region</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
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</thead>
<tbody>
<tr>
<td>Investment Project Financing</td>
<td>Republic of Turkey</td>
<td>Ministry of Labor and Social Security</td>
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</table>

#### Proposed Development Objective(s)

The development objective of the project is to improve the employability of Syrians under Temporary Protection (SuTP), as well as of Turks residing in selected host communities with high presence of SuTP.

#### Components

- Employment services and Active Labor Market Programs ("ALMP") for SuTP and Turkish citizens residing in Host Communities
- Institutional Support for Delivery of Employment Services and ALMPs

The processing of this project is applying the policy requirements exceptions for situations of urgent need of assistance or capacity constraints that are outlined in OP 10.00, paragraph 12.

Yes

#### Financing (in USD Million)

<table>
<thead>
<tr>
<th>Financing Source</th>
<th>Amount</th>
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<tr>
<td>Free-standing TFs for ECA ECCTR Country Unit</td>
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</tr>
<tr>
<td><strong>Total Project Cost</strong></td>
<td><strong>53.00</strong></td>
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</table>

#### Environmental Assessment Category

C - Not Required

#### Decision

The review did authorize the preparation to continue
B. Introduction and Context

Country Context

1. **Turkey’s economic performance since 2000 has been impressive, both before and after the 2008/09 global financial crisis.** Macroeconomic and fiscal stability were at the heart of its economic performance, enabling increased employment and labor incomes, making Turkey an upper middle-income country as well as the world’s 17th largest economy. Poverty incidence more than halved during the 2002-12 period, from 44 percent to 21 percent of the population, and this decrease was shared across both urban and rural areas. Extreme poverty fell even faster, from 13 to 4.5 percent. During this time, Turkey witnessed dramatic urbanization, opened up to foreign trade and finance, harmonized many of its laws and regulations with EU standards and greatly expanded access to public services. It also recovered well from the global crisis of 2008/09, with high economic growth during the 2010-2012 period.

2. **During 2012-2016,** economic growth slowed, and unemployment began to inch upwards. These developments raise concerns about Turkey’s progress towards reducing income inequality. In addition, slow growth in Europe and a deteriorating geopolitical environment in parts of Eastern Europe, Central Asia and the Middle East have negatively impacted exports, investment and growth in Turkey. The influx of Syrians under Temporary Protection (SuTP) reached almost three million in 2016, and has created new social, economic and political demands, particularly in urban centers where the majority of SuTP are living (less than 10 percent of them live in camps).

3. **Domestic developments in 2015 and 2016 presented further challenges.** The Foreign Direct Investment (FDI) inflow to Turkey declined and private investment was delayed, leading to slower economic growth. To counter these effects, the government launched new reforms in 2016, focused on incentivizing research and development and enhancing labor market flexibility, to improve the investment and business climate in Turkey. The government also continues to take action to promote savings, improve social security and the pension system, and establish a sovereign wealth fund, as well as housing and dowry account schemes. However, further reform measures will be needed to address continuing structural vulnerabilities, revitalize private investment, boost growth, and resume Turkey’s convergence with Europe. Most notably, new reform momentum is needed to improve the quality of education and to upgrade skills. Only by boosting productivity growth and creating enough high-productivity jobs to accommodate a rapidly growing labor force will Turkey be able to continue to reduce poverty and share prosperity.

Sectoral and Institutional Context

4. **Turkey has become one of the world’s largest refugee-hosting countries.** As of August 2017, there are around 3.25 million Syrians “under temporary protection” (SuTP), i.e. Syrians who have been granted protection under Law No. 6458 on Foreigners and International Protection in 2013 and Regulation No. 29153
on Temporary Protection of Syrians in 2014. Only 7.5 percent resides in camps, while the rest live outside camps, mostly in urban areas, in many provinces.

5. Since 2011, the Government of Turkey has spent more than an estimated US$25 billion largely from national emergency funds to meet SuTP’s immediate humanitarian and basic needs. The Government made considerable effort to cater to the needs of SuTP and alleviate the strain on social services, support acceptable living conditions, and prevent negative effects on human development of SuTP and the national population. As such, the government has undertaken commendable steps to facilitate access to critical public services such as education and health.

6. However, recognizing that SuTP cannot only rely on social assistance, and recognizing the importance of allowing formal labor market access to SuTP, the Government of Turkey has allowed them to obtain work permits. Regulation No. 8375 on Work Permits approved in January 15, 2016 now allows SuTP to work formally. Their employers can now apply for a work permit in cities where SuTP are registered. The goal of the regulatory change is to help Syrian families be economically independent, to graduate from social assistance, and to ensure that they contribute to the Turkish economy, including with tax revenues, contributions to the social security system, and increased consumption. Being able to actively participate in the economy can also contribute to the psychological well-being of work-able SuTP and, in turn, benefit their families and children.

7. The barriers they face indicate that SuTP will need substantial support, besides the legal framework, to access better jobs. Although an automated permit application system is set up under the Ministry of Labor and Social Security (MoLSS), to date, a small number of SuTP have been issued work permits. The total number of work permits issued is 20,981 as of December 2016, of which 13,298 have been issued in 2016. The low number of work permits issued is indicative of the information, language, and skills barriers that SuTP face. About 61 percent of SuTP aged 18 to 69 have at most secondary education. While there is some information on the education levels of registered SuTP, there is less information on their skill levels and their occupational backgrounds, and how they can be placed in the labor market. As expected, about 50 percent of the SuTP who have obtained work permits have high school education or above. Given the barriers they face, SuTP will need support both to upgrade their skills and to incentivize employers to hire them.

8. In addition, the provinces and communities with high presence of SuTP also need support to access employment opportunities. As mentioned previously, many of the provinces with presence of Syrians were already more disadvantaged, with a less educated population, lower labor force participation and higher unemployment rates than the national average. They will also need support to upgrade the skills of the population and provide employment opportunities.

9. To improve labor market outcomes for SuTP and host communities, there will be need for both supply and demand side interventions. In addition to the adopted regulatory changes, there are numerous activities that need to take place for the vast majority of work-able Syrians to successfully access formal employment: (i)
Supply side interventions that aim to help SuTP generate income in the short term while building skills that allow them to access better jobs; (ii) Demand side interventions that aim to support existing firms or Syrian entrepreneurs for job creation and employment of SuTP; and (iii) Support to the institutions in charge of implementing the interventions given that they will see an increase and a greater diversity in the clients they serve.

10. The proposed project focuses on providing employment support to SuTP and host communities while helping them build skills for sustainable jobs; but is part of a coordinated donor effort to foster both labor supply and demand. The proposed project is part of a total of EUR 100 million Special Measure of the European Commission for a Facility for Refugee Integration in Turkey (EU FRIT), to be implemented directly or with technical support from International Financial Institutions (IFIs). Under the socio-economic component, other than EUR 50 million for the World Bank, an additional EUR 5 million was allocated to the WB and 20 million to KfW. In addition, the EBRD also funds demand-side activities for SuTP.

11. The WB will also be administering under a separate project, an additional EUR 5 million to support the creation of entrepreneurship and employment opportunities for Syrian and Turkish communities in the cities most affected by the Syrian refugee crisis.

12. In order to support a large number of SuTP in a sustainable manner, it is necessary to address comprehensively the constraints they face, building on existing systems and programs for Turks. The employment support system for SuTP has to be run by MoLSS and ISKUR and, in order to be scalable, it needs to build on existing services and programs. This will enable systematic registration of SuTP who require help to find sustainable employment, delivery of a standard package of services and tracking of employment outcomes. As MoLSS and ISKUR have the institutional mandate and basic network to deliver these services to the Turkish population, it will be relatively straightforward to adapt these programs and services for SuTP.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

13. The development objective of the proposed project is to improve the employability of Syrians under Temporary Protection (SuTP) as well as of Turkish citizens residing in selected host communities with high presence of SuTP.

14. To “improve employability” is to address barriers to employment. Both SuTP and host communities face employment barriers that include: 1) information barriers, in particular in the case of SuTP; 2) language skills in the case of SuTP; and 3) technical skills. These barriers all make the productivity of SuTP and host communities too low in comparison with prevailing wages. Thus, the project aims to improve employability by addressing employment barriers with a sequence of employment services and active labor market programs – comprising job counselling, language and technical training, as well as applied training and cash-for-work. In order to assess whether and how active labor market programs improve employability, a separate World Bank project will monitor the impact of the interventions in order to improve future program design.

6 A remaining 25 million of the Special Measure was initially allocated to the European Investment Fund (EIF) but is in the process of being reallocated.
Key Results

15. Achievement of the PDO will be measured by the following indicators:
   - Number of ISKUR-registered SuTP placed in ALMPs (disaggregated by program: language training, skills training, AT, and CFW)
   - Number of ISKUR-registered host community members placed in ALMPs (disaggregated by program: skills training, AT, and CFW)
   - Percentage of ISKUR-registered female and youth SuTPs placed in AT and CfW programs

D. Project Description

1. The project has two components: (i) Employment services and ALMPs for SuTP and Turkish citizens residing in Host Communities; and (ii) Institutional support to ISKUR and MoLSS for delivery, monitoring and evaluation of ALMPs and employment services.

2. Component 1: Employment services and Active Labor Market Programs (“ALMP”) for SuTP and Turkish citizens residing in Host Communities (Euros 38.3 million)
   This component will finance a sequence of employment services and ALMPs for SuTP and Turks in host communities. The objective of the component is to enable SuTP to gain a better understanding of the Turkish job market, build skills, and at the same time, have access to temporary formal employment opportunities to improve their employability. The sequence of employment services and ALMPs for SuTP will include job search support, language training, skills training, applied training (AT) and cash for work (CfW). Job search support will consist of skills assessment and counselling sessions to be provided to participating SuTP.

3. The project will follow the existing ISKUR employment services and ALMPs available for host communities; adapting them only when needed to SuTP. The portfolio of services and programs to be offered will follow to the maximum extent ISKUR processes that are in place. ISKUR already finances skills training, AT, and CfW for Turks. In skills training programs, ISKUR contracts Ministry of Education certified private training providers and pays a stipend to training participants. In AT, ISKUR finances the net minimum wage, as well as accident and health insurance for workers hired by private firms. In CfW, ISKUR finances the gross minimum wage for workers hired by public agencies. For all of skills training, AT and CfW, the project will follow the same process and finance the same wage and training costs as in the ongoing ISKUR programs.

4. However, a skills assessment and profiling methodology tailored to SuTP and Turkish citizens will need to be developed in order to match them with jobs and place them in appropriate active labor market programs. This will be needed given that SuTP may not have their certifications or diplomas with them to guide the ISKUR job and vocational counselors (JVCs) and to signal their qualifications to the market. In addition, the existing cadre of JVCs and modalities of delivering employment services will need to be reinforced to cater to the needs of the SuTP, and provide individual and group counseling services to a larger pool of jobseekers.

5. For those unable to find AT at the beginning, the whole sequence will include language training and skills training, for those who need them, and then again AT, or CfW for those unable to find a job, offering CfW at the end to minimize crowding out. All registered SuTP will be eligible for Turkish language training

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7 The data collected for the registration and the skills assessment will be confidential and only accessible to public agencies and to the World Bank project’s team, for the monitoring and evaluation of the project.
unless they are deemed proficient. Following language training, the JVCs will, again, try to place SuTP in firms, using AT. If unsuccessful, they will then place SuTP in vocational skills training. If at the end the vocational skills training, the SuTP has not been able to find a job, s/he will be eligible to enroll in the CfW program. CfW is offered as a last resort, at the end, to minimize the risk of crowding out. At any moment, the SuTP can choose to “exit” out of the program if s/he finds a job. The SuTP program participants will not be eligible for re-entering the system to benefit from ALMPs once they exit, but they will be eligible to benefit from employment services as other registered Turkish jobseekers.

6. **Turkish program participants will also benefit from the ALMPs financed by the project.** They will be eligible to benefit from skills training, on the job training and CfW programs following the application and placement procedures currently stipulated by ISKUR.

7. **“Less employable” SuTP and host community groups – namely women and youth (15-29) - will have a minimum quota within the project and AT duration may be longer in their case.** The quota will ensure that they receive adequate support to assess their specific barriers, to improve their employability and give them access to temporary employment. They will be prioritized, in particular, for cash-for-work programs, given that it may be more difficult to place them in AT. When placed in AT, they may be allowed a longer duration than the “more employable” group of adult men, given that women and youth may have lower productivity and need more time to build skills.

8. **While AT will be available nationwide, the project will focus on provinces that are selected based on high presence of SuTP, employment outcomes of host communities, capacity to implement the program and labor demand.** The employment services and cash-for-work will be offered in selected provinces through ISKUR local offices. The selection of the provinces will be decided jointly with MoLSS, ISKUR, and AFAD. AT will be available nationwide although, de facto, JVCs may focus on the provinces where they are located.

9. **Component 2: Institutional support for delivery of employment services and ALMPs (Euros 7.15million)** This component will finance activities that support MoLSS and ISKUR to deliver, monitor and evaluate services and programs to be provided to SuTP and members of host communities under this project (Table 3). The activities will reinforce management systems within MoLSS and ISKUR. For MoLSS and ISKUR, this will consist of support for counselling and job assistance, project implementation, information dissemination, communication, monitoring and information technology support.

   **Component 2a: Institutional support for ISKUR**

10. **The project will support strengthening various functions within ISKUR to allow the delivery of employment services and ALMPs in line with the requirements of the project.**

11. **A project implementation unit that will be responsible for day-to-day project coordination will be set up (see Annex 3 for more detail).** The costs of human resources to be contracted out for the PIU and reinforcements to the existing IT systems will be financed under this sub-component.

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8 This will be financed under the project and will be outsourced by ISKUR. A language proficiency test will be provided by certified institutions either at local ISKUR centers or at alternative locations.

9 Crowding out is a risk because cash-for-work is paid at the level of the minimum wage, while it is only a temporary employment option. SuTP working informally may want to participate in cash for work program without it improving their employment outcomes in the medium term (see Annex 2 for a more detailed discussion).
12. **The project will support the strengthening of ISKUR counseling and job assistance capacity.** The support will focus on the selected communities with high presence of SuTP, where the project will provide financial support to the Provincial Offices/service centers. This will also include hiring and training of interpreters to respond to the inflow of new SuTP clients.

13. **ISKUR will strengthen the information dissemination and communication targeting SuTP on accessing employment services and programs available for SuTP and members of host communities.** ISKUR communication efforts will be reinforced by launching a communication campaign via multiple channels both in Turkish and Arabic. The campaign will make use of traditional channels such as radio, television and printed media and ISKUR website and local offices and social media.

14. **The project will reinforce ISKUR systems to monitor employment services and ALMPs provided to SuTP.** There will need to be complementary modules to the existing ISKUR monitoring systems developed and put in place to capture the sequence of employment services and ALMPs, which starts with the registration of SuTP. In addition, a tracking mechanism (including using administrative data available from other institutions or though surveys) will also need to be developed to monitor employment status of SuTP and beneficiaries from host communities after they are placed in a job or they find employment on their own. During the monitoring, personal data of the participants will be secured. However, ISKUR will take necessary measures to ensure that the participants will be reached at later stages. The project will also support IT reinforcements to ensure connectivity and data exchange capacity among local offices in project locations and ISKUR central offices to facilitate monitoring of beneficiaries.

15. **Reporting will follow the same processes as for other ISKUR programs and will rely on information collected and logged onto the existing ISKUR online platforms.** Monthly reports will be automatically queried from provincial offices on different services provided and SuTP and host community members placed on ALMPs. Monitoring will rely largely on information collected during registration by JVCs and entered into an automated platform. Monitoring will predominantly rely on the data collected and inserted to the automated system by JVCs. Details of the monitoring protocols will be included in the Project Operational Manual. Quarterly monitoring reports will be provided to the World Bank and other stakeholders on an agreed format. Monitoring reports will include aggregate data rather than data involving personal information.

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**Component 2b: Institutional support for MoLSS**

16. **The project will support MoLSS to improve the work permit application and monitoring as well as access to the online systems.**

17. **A project implementation unit will be set-up which will be responsible for day-to-day project coordination (see Annex 3 for more detail).** The costs of human resources to be contracted out and reinforcements to the existing IT systems, in particular, on financial management and monitoring will be covered under this component.

18. **The project will reinforce the work permit application systems.** The project will improve the IT systems that are in place to process and monitor work permit applications submitted to MoLSS by employers. For this, a range of activities from development of new software, development of additional IT modules or additions to
existing online platform, linkages and exchange capacity with other databases that collect information on SuTP, and training for staff would be supported under this component.

19. **MoLSS will strengthen the information dissemination and communication targeting SuTP and employers on applying for work permits.** MoLSS communication efforts will be reinforced by launching a communication campaign via multiple channels both in Turkish and Arabic. The project will support the dissemination of information about work permit processes in terms of targeted awareness campaigns, trainings to be provided to employers, Chambers of Commerce and Industry and SuTP in selected provinces where there is large demand and SuTP live in large numbers.

20. **The monitoring conducted by ISKUR and MoLSS financed under the project will be an important input into an impact evaluation.** The purpose of the impact evaluation will be to examine the impact of the whole employment services and ALMP sequence, in order to inform a potential scale-up, introduce modifications, report on employment status of beneficiaries and a control group, addressed during the lifespan of the project, from 6 to 12 months after program completion, and draw lessons applicable to other countries hosting refugee populations. The impact evaluation will need to closely monitor when project beneficiaries find employment or become discouraged, in order to adjust the steps and sequencing. It will be key to track the outcomes of project beneficiaries and the control group of similar SuTP who would not benefit from the project, including with statistical methods and household surveys. The impact evaluation of ALMPs will be financed under the EUR 5 million World Bank project but will be closely coordinated with the MoLSS and ISKUR.

E. Implementation

Institutional and Implementation Arrangements

21. **The project design is based on ISKUR’s implementation modality for ALMPs but the infrastructure needs to be adapted in line with new legislation.** In February 2017, the Parliament passed an amendment to allow ISKUR to manage external funding. The law will come into effect after approval by the President and has been published in the official gazette.

22. **Project Implementation Units (PIUs) will be established under MoLSS and ISKUR which will coordinate and facilitate project activities and have fiduciary responsibility.** In addition to the MoLSS and ISKUR personnel employed, the PIUs will be equipped with individual consultants in the areas of procurement, financial management, and monitoring and evaluation (M&E), and will also provide technical support under the project and certify compliance with World Bank requirements for procurement, reporting, auditing, and monitoring.
23. A Project Operational Manual (POM) that details responsibilities of different stakeholders and institutions at central and local level will be developed and finalized before effectiveness. With regard to the procurement and financial management system both MoLSS and ISKUR PIUs will be responsible for budgeting and executing all activities and preparing the documentation for processing the related payments. During the preparation phase of the project, ISKUR provincial offices will prepare relevant implementation plans for ALMP and CfW programs and budget estimations under the coordination of ISKUR and PIUs. These plans will need to updated on a regular basis aligned with pace of implementation. ISKUR provincial offices will also prepare and send physical and financial implementation progress reports and supporting documentation related with ALMP and CfW programs to PIU monthly (or every quarter).

24. Both MoLSS and ISKUR PIUs will compile all financial and physical implementation data and provide quarterly implementation progress reports to the World Bank. The project funds will be kept in designated accounts established at the Central Bank of the Republic of Turkey (CBRT) or in a commercial bank satisfactory to the World Bank. These accounts will be managed by the PIUs.

25. ISKUR provincial offices will be responsible for implementing day-to-day project activities, and monitoring and reporting on the results. Together with the experts in ISKUR headquarters as well as the liaison officers in the PIU, the provincial offices will also be responsible for drafting Terms of References (TORs) for consultants, technical specifications, and bidding documents. ISKUR will assign technical staff to the PIU during the selection of consultants and conducting procurement activities. The PIU will be responsible in signing and paying contracts.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Project will be implemented nationwide but focus mainly in cities affected by SuTP. The location of project activities does not have any positive or negative implications on safeguards since the project does not trigger any policy.

G. Environmental and Social Safeguards Specialists on the Team

Sanjay Agarwal, Social Safeguards Specialist
Arzu Uraz, Social Safeguards Specialist
Esra Arikan, Environmental Safeguards Specialist
## SAFEGUARD POLICIES THAT MIGHT APPLY

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
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<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>No</td>
<td>The project will not include activities which may have direct or indirect adverse impact on environment. Therefore, the project is categorized as C according to OP 4.01. Due to the category, no safeguards document to be prepared either by the Bank or the Borrower before or after project appraisal. Since the project will involve consultancy works and cash-for-work arrangement, Bank should make sure with the PIU that the TORs and scope of cash transfer should include provisions about applying Bank’s safeguard policies in the activities to be conducted as a result of consultancy works and/or cash cash-for-work arrangements</td>
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<td>Natural Habitats OP/BP 4.04</td>
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<td>Forests OP/BP 4.36</td>
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<td>Pest Management OP 4.09</td>
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<td>Physical Cultural Resources OP/BP 4.11</td>
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<td>Indigenous Peoples OP/BP 4.10</td>
<td>No</td>
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<td>Involuntary Resettlement OP/BP 4.12</td>
<td>No</td>
<td>The project does not trigger OP 4.12 as it does not support any type of activities that require land acquisition or involuntary resettlement. However, all the technical assistance, consultancy activities sought under the project components will need to comply with the Bank’s operational and safeguards policies.</td>
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<td>Safety of Dams OP/BP 4.37</td>
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<td>Projects on International Waterways OP/BP 7.50</td>
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<td>Projects in Disputed Areas OP/BP 7.60</td>
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## KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

### A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

   **Not applicable.**
2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
Not applicable.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
Not applicable.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.
Not applicable

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.
Not applicable

B. Disclosure Requirements

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?
NA

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?
NA
All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
NA

Have costs related to safeguard policy measures been included in the project cost?
NA

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
NA

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
NA

CONTACT POINT

World Bank

Mirey Ovadiya
Sr Social Protection Specialist

Borrower/Client/Recipient

Republic of Turkey

Implementing Agencies

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APPROVAL

<table>
<thead>
<tr>
<th>Task Team Leader(s):</th>
<th>Mirey Ovadiya</th>
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Approved By

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<tr>
<th>Safeguards Advisor:</th>
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<tbody>
<tr>
<td>Practice Manager/Manager:</td>
<td>Cem Mete</td>
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<tr>
<td>Country Director:</td>
<td>Johannes C.M. Zutt</td>
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