



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 02/23/2021 | Report No: ESRSA01078



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Turkey	EUROPE AND CENTRAL ASIA	P171471	
Project Name	Support for Transition to Labor Market Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	3/16/2020	3/12/2021
Borrower(s)	Implementing Agency(ies)		
Turkish Red Crescent (TRC), Ministry of Family, Labor and Social Services	Turkish Employment Agency (ISKUR)		

Proposed Development Objective

The project development objectives are to improve employability of Syrians under Temporary Protection (SuTP), Persons under Temporary and International Protection (PUTIP) and Turkish Citizens and to facilitate access to labor markets.

Financing (in USD Million)	Amount
Total Project Cost	88.58

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project is to promote integration of Syrians under Temporary Protection (SuTP), International Protection Status Holders and Applicants (“IPSHA”) in Turkey and Turkish citizens into the labor markets and formal jobs and strengthen local institutional capacity to implement a menu of active labor market programs (ALMPs) and job search assistance/counselling activities. The project activities will particularly focus on (i) linking beneficiaries to jobs; (ii) expanding geographic coverage of employment services and labor market placement; (iii) expanding the existing



menu of ALMPs and counseling activities and delivery of programs and benefits via multiple intermediaries; and (iv) linking social assistance beneficiaries to more intensive job counseling to facilitate transition out of social assistance.

The project will have two components: (i) Support for counseling services and employment support and (ii) Support for delivery of employment services. Component 1 (58.5 million Euros) will finance provision of job and vocational counseling services, and employment support, and a menu of active labor market programs. Component 2 (16.5 million Euros) will finance project management and coordination, monitoring and evaluation data management and analytics, and communication activities to support provision of the services under Component 1 and broader policy making on socioeconomic integration of people under temporary and international protection and migration policy.

The project is being processed under condensed processing procedures, based on World Bank Policy on Investment Project Financing, Paragraph 12. The rationale for processing the project under the condensed procedures is the urgent need for assistance to support the Government of Turkey's efforts to mitigate rising pressures on service delivery from the continual influx of refugees across the border, from camps to cities and also on the urgent need to support refugees to become self-resilient and reliant through appropriate socio-economic integration tools. Currently, UNHCR estimates that there are approximately 4 million refugees in Turkey, the majority originating from bordering Syria. Although most refugees are located in cities rather than temporary accommodation centers (TACs), about 1.6 percent of refugees are located in these TACs. However, the government intends to phase out from the camps and is transitioning people, except the most vulnerable, into cities gradually. This change poses various challenges to most cities in Turkey, already hosting thousands of refugees, including issues such as increased social tensions, increased service delivery pressures, and pressures on availability of resources.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Turkey is both a transit and reception country for migrants and refugees and, globally, the country hosts the highest number of refugees.

As of February 3, 2021, there are around 3.68 million refugees (temporary and international protection) of which the largest share consists of the Syrian refugees under temporary protection. Only 1.6 percent reside in temporary accommodation centers while the rest live outside, mostly in urban areas. Refugees reside throughout the country, but over 75 percent live in 10 provinces. Refugees represent a significant percentage of the population in provinces bordering Syria, such as Hatay, Sanliurfa, and Gaziantep. In Kilis, there are almost as many Syrians as Turkish citizens. Recognizing that refugees cannot only rely on social assistance, and the importance of allowing formal labor market access to refugees, the Government of Turkey has allowed the Syrian Under Temporary Protection (SuTP) to obtain work permits. Regulation No. 8375 on Work Permits approved on January 15, 2016, now allows SuTP to work formally. Employers that want to employ SuTP 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, graduate from social assistance, and 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 able to work SuTP and, in turn, benefit their families and children. Despite having been given formal access to the labor market, refugees face considerable constraints to work formally



and require considerable support to access better jobs. An automated permit application system is set up under the Ministry of Family, Labor and Social Services (MoLSS). The total number of work permits issued for Syrians under temporary protection is 92,754 according to 2019 figures. The low number of work permits issued is indicative of the information, language, and skills barriers that SuTP face as well as employers' unfamiliarity and misinformation about the online system. Available program level data and qualitative survey data suggest that a large majority (70-80 percent) of the working age population (ages 16 to 64) has primary school education or below and lack Turkish language and work habits/culture that are required by employers which are major disadvantages vis-a-vis their Turkish peers and the Turkish labor market. 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. Available program data also suggests that 20 percent of those who are placed in formal jobs have difficulties remaining in the program and drop out on average within one month due to a variety of reasons. In addition, refugee women have very low labor market participation rates and more constraints not only in terms of qualifications but also cultural norms. Given the barriers they face, refugees will need support both to upgrade their skills (technical, language and soft-skills), and to understand the work culture and the labor market.

Most of the provinces hosting high numbers of refugees were already more disadvantaged, with a less educated population, lower labor force participation, and higher unemployment rates than the national average. The influx of refugees has created additional social and political pressure, and the need for support, in particular in employment creation and access to jobs. Refugees generally live in a limited number of urban and peri-urban neighborhoods in target provinces. These regions also show high concentration of informal labor. Refugees face considerable constraints to access formal employment. The low number of work permits issued indicates that refugees are facing information, language, and skills barriers, and also maybe disincentivized due to location-related administrative processes for the refugees as changing registration location is a cumbersome and costly administrative procedure. This limits labor mobility and may also result in foregoing other social benefits. As a result, more than two thirds of Syrian households are unable to rely on predictable job opportunities.

Despite the highly responsive efforts of the Turkish government, there are emerging concerns regarding social cohesion in a number of affected communities. In 2017 and 2018, social cohesion within communities hosting Syrians measured by trust, acceptance and belonging reportedly declined due to protracted nature of the displacement crisis, the decreasing likelihood of near-term return, economic stresses on communities due to declining economic performance within Turkey, enduring cultural and social distance between refugees and host communities, and broader regional political volatility. Perceptions that Syrians out-compete hosts for low-wage jobs and are pushing rents up, perceived violations of social norms by displaced communities, and perceived preferential access to public services and assistance for Syrians have also contributed to deteriorating social cohesion in host areas. The language barrier is among the most important factors hindering socio-economic harmonization, especially for women and children.

Due to rising unemployment, an influx of refugees creates an additional burden and competition for employment opportunities among both refugee and host communities. During unemployment times, application to ISKUR's employment support programs increases and this may create an additional burden on ISKUR side. With the COVID 19 pandemic, unemployment impacts exacerbated for those SuTPs and IPSHA who were working both working formally and informally in the country.



The Turkish Government aims to gradually transition workable ESSN beneficiaries out of social assistance and into sustainable livelihoods. An Exit Strategy prepared and published by the Office of the Presidency and Ministry of Family, Labor and Social Services targets over 160,000 workable refugees to enter the formal labor market. This will require adjustment of cash assistance benefits and parameters to support this transition from social assistance into jobs as well as support for the beneficiaries to prepare for the labor market and formal and sustainable jobs. ISKUR, Kizilay and MoFLSS (mainly the Social Assistance Directorate General, and International Labor Force Directorate General) all form part of a working group (along with ECHO which is the financier of the ESSN) to decide the parameters to be used in this transition process.

In light of the labor market constraints and constraints of the target population at hand, the proposed project aims at providing employment support to work-able refugees and Turkish citizens residing in selected locations, while helping them prepare for sustainable jobs. 'Selected localities' means localities (a) that have a high presence of refugees, which has affected the labor market conditions of those localities; (b) whose Turkish citizen residents, along with refugees, are in need of employment support; and (c) that have a considerable share of Emergency Social Safety Net beneficiaries; (d) that have Turkish Red Crescent Community Centers that are operational; and e) have been agreed by the World Bank and set forth in the Project Operations Manual (POM). These provinces will include Adana, Istanbul, Gaziantep, Sanliurfa, Kocaeli, Konya, Bursa and Izmir, some being the pilot provinces under the ongoing Employment Support Project (P161670).

The employment support system for refugees will be run by the MoFLSS and ISKUR, which have the institutional mandate and basic network to deliver these services to the Turkish citizens and already have some experience with delivery to refugees so it will be relatively straightforward to either expand or adapt these programs and services. The experience to date and lessons learned on programs supporting refugees has guided the design and implementation of proposed active labor market programs and counseling services. In addition, Kizilay, with its extensive and established network of community centers, is well placed to provide counselling services to refugees and workable ESSN beneficiaries. The combination of the counseling and intermediation services to be provided by ISKUR is expected to improve the refugees access to formal jobs and help host community members/Turkish citizens to also be better equipped to access better jobs. Furthermore, strengthening the linkages between monitoring systems of the MoFLSS, ISKUR and Kizilay will ensure adequate monitoring of refugees' journey through social assistance, employment services, and in and out of the labor market. The adaptation of ISKUR and Kizilay programs and strengthening of their monitoring systems, will be the crux of the proposed strategy to support workable refugees and Turkish citizens to access sustainable jobs. This will include systematic screening and registration of refugees and Turkish citizens who require help to find sustainable employment, delivery of a package of employment and other counseling services and tracking of employment outcomes. The combination of the counseling and intermediation services to be provided by ISKUR is expected to improve the refugees access to sustainable and formal jobs and help host community members/Turkish citizens to also be better equipped to access better jobs.

D. 2. Borrower's Institutional Capacity

Ministry of Family, Labor and Social Security (MoFLSS) and its PMU will have the overall coordination role for the project. The project will be implemented by MoFLSS, ISKUR and Kizilay. ISKUR and Kizilay are every well-established and long-standing institutions in their respective areas. ISKUR is public agency responsible for job-intermediation in Turkey and has been collaborating with the World Bank on an ongoing employment support project for Syrian refugees and Turkish citizens. Kizilay (Turkish Red Crescent), an affiliate of the International Red Cross and Crescent, is an emergency assistance agency which has been implementing over the last three years the social assistance



programs (Emergency Social Safety Net-ESSN and Conditional Cash Transfer-CCT) targeting refugees. The MoFLSS International Labor Force Directorate has been the grant recipient for the ongoing Employment Support project financed with an EU grant (under the Facility for Refugees in Turkey-Phase 1). The Social Assistance Directorate of MoFLSS is responsible for coordinating social assistance policy and programs in Turkey. This project will be processed and implemented following Bank emergency operational guidelines and it will rely on the institutions' existing capacity and expertise for implementation while providing necessary additional support for strengthening their administrative systems.

All three institutions will have dedicated project management staff, including relevant social and labor experts to manage stakeholder engagement, grievances and also labor related matters, which will be responsible for the day to day implementation of the project, monitoring and reporting to the World Bank. Staff will be located both in the headquarters (Ankara) and project provinces and will include full-time staff to be assigned to this project. If necessary, additional contractual staff may be hired for the implementation period. Existing PMU staff within MoFLSS and ISKUR includes labor market experts, counselors, financial management, procurement, implementation, IT, communication and monitoring and evaluation experts. One additional PMU which will be established within Kizilay will include psycho-social counselors, livelihood experts, financial management, procurement, implementation, IT, communication and monitoring and evaluation experts. ISKUR Provincial Directorates and Kizilay Community Centers in project provinces will be responsible for day to day implementation and coordination. There will be dedicated staff assigned to the project in each of the community centers and provincial directorates agencies for the project under Component 1.

Kizilay (TRC) has also been implementing a small-grant operation on Support to Refugees Transitioning from Temporary Accommodation Centers to Communities Project (P171489) which is funded by the Bank's State and Peace Building Fund. Kizilay has prepared a Stakeholder Engagement Plan and a Labor Management Procedure for that project. MoFLSS and ISKUR have an ongoing project with the Bank under old safeguards polices. However, they do not have any prior experience with application of the ESF. ISKUR will receive Bank's support and training on ESF implementation, including the implementation of SEP and LMP. Both ISKUR and Kizilay will need additional Bank guidance during project implementation to implement ESF requirements.

The Turkish Employment Agency, ISKUR, which has been actively providing intermediation services, language training, vocational training and on the job training programs to refugees since the beginning of 2019. ISKUR is currently the implementing agency for the World Bank Employment Support Project for Syrians under Temporary Protection and Turkish Citizens (P161670), funded by the EU. This project will be an extension of the first project. ISKUR has a large portfolio of active labor market programs which consist of employment incentives (wage subsidies), on the job training, vocational training, cash for work and most recently language training programs from all of which technically all registered refugees can benefit from. It serves over 3 million job seekers annually (out of which 500,000 benefit from active labor market programs) through a network of provincial and district offices.

Kizilay (Turkish Red Crescent) delivers cash transfers to refugees under the Emergency Safety Net Program (ESSN) as the implementing agency of the Ministry of Family, Labor and Social Services. Kizilay already supports a portion of workable ESSN beneficiaries who are interested in getting formal or better jobs with language training, life-skills/labor market adjustment training including information and support with work permit applications support and referrals to ISKUR.



II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Low

The environmental risk is rated as Low. The activities to be carried out by the Project will cover support for intermediation/counseling services and employment support for refugees and Turkish citizens, and support for delivery of employment services. The Project is expected to involve small works for the interior renovation and/or refurbishment of existing office spaces of the PIUs, including setting up and installation of IT equipment. Therefore, the potential adverse environmental risks to and impacts are likely to be minimal or negligible in this scope.

Social Risk Rating

Moderate

The social risk is rated as Moderate. Intrinsic social risks of the project are low, and the project is expected to have positive impacts on SuTP, IPSHA and Turkish Citizens, as it aims to improve access of PuITPs and Turkish citizens to employment services and employment opportunities; and to strengthen the delivery of national employment support services. The project will provide applied training (ATP), intermediation and various counselling services for groups with different needs among the SuTP, IPSHA and host community populations, who will be the main project beneficiaries. The project will have positive impacts on vulnerable groups including job counselling and placement services for women and disabled, who are included in the project design. The project is not expected to cause any direct irreversible or unmanageable impacts. The project will not support any major construction works, therefore risk and impacts related to land acquisition and involuntary resettlement, and cultural heritage are not expected. However, contextual social risks to the project are substantial, but these are addressed through both the project design and the ESF instruments. Employers who benefit from ISKUR ATP programs need to be registered with ISKUR and thus be formal enterprises subject to the the Labor code. Thereby the potential risks of child or forced labor and pay below official minimum wages, usually associated with informal work , have been substantially reduced, and breaches hereof will be subject to the Labor Law. Community health and safety risks are expected to be minimal and covered under existing law and OHS guidelines. To improve social cohesion at work places benefitting from the project, Kizilay and ISKUR will provide programs on work place culture and labor rights including grievance options to both refugees and Turkish citizens, which will also enhance their understanding of and ability to protect their own rights.

Contextual risks stemming from geopolitical context and existing social tensions are substantial. In order to mitigate the risk, ISKUR and MoFLSS will be assisted to expand their active labor market programs and employment support programs for refugees and Turkish citizens . Stakeholder engagement risk is considered to be substantial due to social tensions that are reported to exist in some project areas where Syrian refugee influx is seen by the local population as intensifying competition for jobs and access to services. In order to address this risk, Stakeholder Engagement Plan (SEP) was prepared by MoFLSS to guide meaningful consultations with different stakeholders and project beneficiaries, incorporate their voices into project implementation, and prevent the risk of the Project unintentionally causing social disruption between host communities and PuITPs communities, and within each of the communities. MoFLSS, ISKUR and Kizilay will develop a targeted communication strategy about the Project. SEP



includes project level grievance redress mechanism to capture suggestions and complaints by the project beneficiaries.

In terms of the capacity of the Borrower, ISKUR has only operational experience under the WB employment support project which was implemented under the Bank's previous safeguards policies and had lower social risks, therefore, this will be the first project for ISKUR and MoFLSS to be implemented under ESF. Therefore, the capacity of the implementing agencies will need to be strengthened especially managing stakeholder engagement, and GRM.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The project development objective is to improve access of People under Temporary/International Protection (PuITP) and Turkish citizens to employment opportunities.

The project will have two components: (i) Support for counseling services and employment support and (ii) Support for delivery of employment services. Component 1 (58.5 million Euros) will finance provision of counseling services, intermediation services and a menu of active labor market programs. Component 2 (16.5 million Euros) will finance project management and coordination, monitoring and evaluation data management and analytics, and communication activities to support provision of the services under Component 1 and broader policy making on socioeconomic integration of foreigners under protection and migration policy

The Project is expected to involve small works for the interior renovation and/or minimal refurbishment of existing office spaces of the PIUs, including setting up and installation of IT equipments. Thus, the Project is likely to produce minimal or negligible adverse environmental risks and impacts, and does not require any environmental mitigation instruments. Possible minor environmental risks and impacts that could be resulted from the small office renovation works and IT equipment installation will be sufficiently managed by the national environmental and OHS legislation. The project is expected to have positive social impacts on Syrians under Temporary Protection ("SuTP"), International Protection Status Holders and Applicants (IPSHA) and Turkish citizens, as it aims to improve access of SuTP, IPSHA and Turkish citizens to employment services and employment opportunities; and to strengthen the delivery of national employment support services. The project will provide applied training program (ATP) (equivalent of on the job training), intermediation and various counselling services for groups with different needs among the SuTP, IPSHA and host community populations, who will be the main project beneficiaries. The proposed project would benefit all work-able SuTP, IPSHA and Turkish citizens with a special focus on work-able ESSN beneficiaries residing in project localities. The project will provide employment support services (i.e. training, counseling and job placement services) to an estimated 22,000 beneficiaries of ISKUR ALMPs and more than 75 thousand beneficiaries of Kizilay support services. Potential beneficiaries will be selected from the workable ESSN beneficiary lists and jobseekers registered with ISKUR. Beneficiaries will be screened and grouped according to their needs and employability status.

Subsequently beneficiaries will be offered employment support services and appropriate referrals based on their needs. In addition, employers who will be participating in the program and receiving the beneficiaries and implementing institutions will all also benefit from the project. Occupations and sectors for on the job training



program placements will be driven by labor market needs. The sectors that have been most frequently used for job placements in the existing project have been manufacturing (textiles, food processing, machinery, plastics, packaging), services (hospitality, restaurants, catering, health services, retail) and handicrafts.

The project is not expected to cause any direct irreversible or unmanageable impacts. It will not involve any involuntary resettlement or land acquisition, and no impacts on cultural heritage. Community health and safety risks are expected to be low. Employers who will benefit from the ISKUR ATP program will need to be registered with ISKUR, meaning these will be formal enterprises obliged to be compliant with the national Labor Code, which will help minimize the risk of any potential child or forced labor risks which are usually associated with the work in informal sector. Kizilay and ISKUR will provide trainings and counseling on benefits and labor rights related to formal work, work culture and employers' expectations in Turkey, and language training as a measure to improve social cohesion at the work place.

The project design also includes special measures for job counselling and placement services for vulnerable groups, mainly safety net beneficiaries (Emergency Safety Net Program), women and youth with low skills. The stakeholder engagement plan includes measures for the vulnerable groups.

While intrinsic social risks of the project are low, contextual risks stemming from the geopolitical context and existing social tensions between host communities and SuTP and IPSHA including perceptions around competition for jobs are considered substantial. Labor risks, which are generally substantial in the informal sector, are considered moderate under the project, since it will work with formal enterprises only, which will be subject to the national Labor Code. Rising social tensions are reported to exist in some project areas where the influx of Syrian refugees is perceived by the local population as intensifying competition for jobs and access to services. In order to mitigate/reduce this risk, the Project will provide assistance both to eligible Turkish citizens as well as PuITPs, and ensure public awareness of this balanced approach. Due to cultural gender norms, women may lack interest, ability or willingness to engage in the employment training opportunities, which may not find approval by their families. While risks related to SEA/SH in connection with activities directly related to the Project is assessed as low, particularly in view of all employment being in the formal sector, domestic/intimate partner violence is reported among Syrian refugees may be exacerbated as a result of changes in intra-household roles and relations as a result of the project. Such risks will be addressed through training sessions on SEA/SH within the counselling services that Kizilay will provide to SuTP and IPSHA families. Kizilay has experience in addressing these gender related issues among the refugees and will work in direct contact with the General Directorate of Family and Women of the MoFLSS.

The preparation of this ESRS was informed by: 1) the review of project design document; 2) consultations with a broad range of stakeholders including institutional stakeholders; and, 3) review of the existing UN and World Bank social assessments carried out in the past two years in the field and beneficiary assessments as follows:

- Del Carpio X. V., and M. Wagner. 2015. "The Impact of Syrian Refugees on the Turkish Labor Market." Policy Research Working Paper 7402; Ceritoglu, et al. 2015. "The Impact of Syrian Refugees on Natives' Labor Market Outcomes in Turkey: Evidence from a Quasi-Experimental Design." MPRA Paper No. 61503.
- Lessons learned from Refugee Response in Turkey, ILO, 2019
- Employment Support Project for SuTP and Turkish Citizens Project, ISKUR Monitoring Data.



- AFAD (Disaster and Emergency Management Agency), Ministry of Health, and World Health Organization. 2016. “Health Status Survey of Syrian Refugees in Turkey”

ESS10 Stakeholder Engagement and Information Disclosure

Prior to appraisal, MoFLSS and ISKUR prepared an advanced draft Stakeholder Engagement Plan (SEP), which identifies: (i) the key stakeholders; (ii) means of sharing and disclosing information to the stakeholders ; (iii) frequency of the engagement of project stakeholders and beneficiaries throughout the project; d) feedback mechanisms; e) responsible units/organizations with this engagement; and f) timeline for the engagement. The process of stakeholder engagement has begun during preparation and will continue into project implementation. MoFLSS will disclose the draft SEP will in Turkish in Ankara in December 2019 and stakeholder consultations will be held before appraisal completion. The SEP will be updated to include inputs from consultations and then redisclosed. The SEP will be revised as needed during project implementation.

The MoFLSS, ISKUR and also Kizilay have a functional GRM in place serving both in Turkish and Arabic, which is accessible to the PuITP who want to benefit from the employment services. The GRMs established under the ongoing projects with the Bank, will be continued to be utilized as it is accessible, functional and receiving grievances. Efforts will be made to ensure that workers benefiting from the on the job training programs under the Component 1 (“project beneficiaries”), as well as those potentially eligible workers with unsuccessful applications to such benefits, will be knowledgeable about and have access to the GRM. In addition, the Presidency’s CIMER (Public Communication Center) are accessible and functional for any Turkish citizen. YIMER, which is the Public Communication Center for the foreigners in the country managed by Ministry of Interior, is open to all foreigners, including the Syrians.

As a part of the Component 2, the project will develop institutional capacity for stakeholder engagement during implementation in order to minimize the risk of social tension and competing interests of communities who would like to benefit from the ISKUR's employment programs. In addition, depending on the nature of any potential social tensions on the ground, ISKUR's provincial directorates and Kizilay's community centers will undertake targeted and pro-active public communications specialized for both PuITP and host communities to emphasize the mutual socio-economic benefits of the project. Since the project is funded under the EU’s FRIT funds, EU visibility and communications plan is prepared and will interact in line with the project’s SEP.

Stakeholder engagement risk is considered to be substantial because of social tensions that are reported to exist in some project areas as Syrian refugee influx is seen by local population as intensifying competition for jobs and access to services. In order to address the risk, the Project will provide employment assistance both to eligible Turkish citizens, SuTP and IPSHA. SEP will guide meaningful consultations with different stakeholders and project beneficiaries, incorporate their voices into project implementation, and prevent the risk of the Project unintentionally causing social disruption between Turkish citizens and SuTP and IPSHA and within each of the communities. MoFLSS, ISKUR and Kizilay will develop a targeted communication strategy about the Project, in addition to a project level grievance redress mechanism.



Vulnerable groups may be from both the migrant and host communities who will be among the project beneficiaries participating into the project. They may be illiterate or have different vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure. The Stakeholder Engagement Plan and the project design has specified measures to include more vulnerable beneficiaries who are especially tied to ESSN.

TRC staff are trained and sensitized in working with vulnerable people. All arrangements will be made to make vulnerable people comfortable and feel free to express themselves. Vulnerable groups may be from both the migrant and host communities who will be among the project beneficiaries (in other words participating as “community/beneficiary” workers to the project. Those who are willing to engage in a work, may be illiterate or have different vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure. For disabled persons who want to engage in the project as a project beneficiary, the project has included measures for their accessibility and will have measures to match their skills with the labor demand. Depending on the disability circumstances, house visits or online channels may also be utilized as needed for information sharing purposes, especially under the pandemic circumstances as allowed by the project budget limitations.

Communication materials, content and modalities have taken into consideration the needs of female beneficiaries. Female beneficiaries will be offered, for example, more intensive advice regarding access to childcare, schools and health services as well as specialized advice on workplace culture and strategies to engage other household members on the decision of the female beneficiary to enter the labor market. This will be done through special sessions for women to address constraints related to cultural norms, work habits, domestic violence, SEA/SH risks at workplace and other household constraints.

Due to Covid19 pandemic, consultations/SEP activities will be either virtual or conducted under the social distancing measures. Specific content to increase COVID 19 risk communication will be developed under the Project and communicated widely with stakeholders, as relevant.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will engage direct workers and contracted workers. The project will not engage community workers and primary supply chain workers. Workers benefiting from the on the job training programs under the Component 1 are project beneficiaries. However, labor management procedures (LMP) will include provisions on terms and conditions applicable to such beneficiary workers, and the grievance mechanism which they can access. Direct workers are employees of MoFLSS and ISKUR who will be engaged in implementation of project, and any consultants hired by the PMU to perform activities in relation to project implementation (eg. stakeholder engagement, monitoring and evaluation, financial management, safeguards, etc). Employees of MoFLSS are civil servants. Employees of ISKUR are civil servants and public workers. Civil servants who will be working in relation to the project, will remain subject to



the terms and conditions of their existing public sector employment agreement. ESS 2 provisions of OHS, and prohibition of child and forced labor will apply to civil servants.

Contracted workers are employees of Kizilay (Turkish Red Crescent) and any workers hired by the third party to provide project support (e.g. counselling, communications, monitoring and evaluations, etc..). they will be subject to the Turkish Labor Code.

MoFLSS prepared the LMP which will apply to project workers and includes terms and conditions for beneficiary workers. The LMP includes grievance mechanism for direct and contracted workers, and means by which beneficiary workers can raise workplace concerns.

Community workers: The costs of the provision of the applied training program (equivalent of on the job training) for beneficiaries will be paid by the employer. The beneficiaries will be paid daily stipends which are equivalent to the monthly minimum wage level. The program will also pay for workers compensation and health insurance for the duration of the applied training. Project Beneficiaries (community workers) will include workable ESSN beneficiaries and jobseekers registered with İŞKUR. Beneficiaries will be screened for their needs and employability status

Turkish Labor Code (No. 4857) is to large extent consistent with the ESS 2. Turkey ratified all the four Core ILO Conventions and OHS ILO Conventions. The main gap with ESS2 is related to the requirement for the grievance mechanism for workers. While the national legislation provides for Labor Courts to raise labor rights concerns, the Labor Code does not include specific requirements for workplace grievance mechanism. The Labor Code includes provisions to ensure contracted workers are paid, however, it does not include provisions regarding the selection, management and monitoring of contractors with regard to ESS2 requirements. Though, Labor Code applies to the types of workers who would be considered as contracted workers under ESS2 definition.

The minimum working age is 15 years and the law prohibits persons below the age of 18 years to work in hazardous occupations. Forced labor is prohibited by the Turkish Constitution. Labor Code only applies to legally employed foreigners.

The Labor Code includes provisions for the minimum wage and sets maximum weekly hours as 45 hours, not exceeding 11 hours daily. The annual limit for overtime work is 270 hours. Overtime hours are paid 1.5 times the normal hourly rate, or 1.25 times for part-time employees. Employees may choose to receive 1.5 times the amount of overtime work as time off in lieu of financial compensation for overtime. Workers are entitled to one paid rest day per week. The law provides for the prohibition of discrimination in employment based on language, race, sex, political opinion, philosophical belief, and religion. Employment may not be terminated on the grounds of race, color, sex, marital status, family responsibilities, pregnancy, birth, religion and political opinion. At least 6% of employees in enterprises employing at least 50 persons should be disabled, ex-convicts or victims of terror. Workers have the right to form and join trade unions.

The Labor Code (Article 4) does not apply to agricultural and forestry enterprises employing less than 50 workers, family-run construction work related to agriculture, works and handicrafts performed at home, domestic work, sportsmen, people in rehabilitation, enterprises with three or less employees working as tradesmen or producing



small handicraft. In this project, all employment opportunities will require to be in formally registered jobs and enterprises, which means that the beneficiary workers will be covered by the provisions of the Labor Code.

Law on OHS (No. 6331) governs workplace environments and industries (both public and private) and all categories of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries. Law is consistent with the requirements of the ESS 2. The partial gap exists in the requirement for the provisions of facilities – the law only requires provisions of canteens. The OHS law does not require an employer to prepare and overarching OHS plan.

With respect to the current global COVID19 situation, Government of Turkey has prepared and issued various guidelines and measures, which are in line with WHO and other international standards, to be taken against Covid 19 pandemic risks related to civil works, OHS and for workplaces. These measures are included in the LMP and SEP, and will be included within the PIU workplace. Those measures will be applied to ensure the well-being of the project workers.

Project will rely on the Turkish labor code and the regulations of MoFLSS and ISKUR as they will be the main implementing agencies of the project for formal employment and registry, work place adaptation programs. For gaps related to workers grievances, GBV related issues and stakeholder engagement Bank's standards will apply as detailed in LMP.

Employers who benefit from ISKUR applied training program need to be registered with ISKUR and thus be formal enterprises subject to the Labor Law. Thereby the potential risks of child or forced labor and pay below the official minimum wages, usually associated with informal work, have been substantially reduced, and breaches hereof will be subject to the Labor Law. To improve social cohesion at workplaces benefitting from the project, TRC and ISKUR will provide programs on workplace culture and labor rights including grievance options to both SuTPs and Turkish citizens, which will also enhance their understanding of and ability to protect their own rights.

As with all ISKUR ATP/on the job training programs there will be an employment guarantee provision for a share of participants, with sanctions for non-compliant firms such as the exclusion from subsequent rounds of the programs. Under the ongoing FRIT 1 program targeting SuTP, this is set at 20 percent and will continue as such. Eligibility criteria including employment guarantees for participating firms/employers will follow existing ISKUR program criteria and details will be reflected in the Project Operational Manual.

Albeit the sectors are not known at this stage, potential sectors to be benefiting from the project are expected to be manufacturing (textiles, food processing, machinery, plastics, packaging), services (hospitality, restaurants, catering, health services, retail) and handicrafts. World Bank Group exclusion list will be applied and will be included in the POM. Labor risks could be mainly OHS risks that are related with these sectors. Both ISKUR and MoFLSS are the main governing bodies supervising OHS matters and enforcing the national regulations for the firms. The design of the ATP program and the LMP address risks associated with the term and working conditions and equal opportunity. ATP requires employers participating in the program to be compliant with the national OHS laws, and İŞKUR carries out periodic supervisions of employers, as detailed in the LMP.



Given the fact that the main implementing agencies of the project are MoFLSS and İŞKUR have the mandate and responsibility to supervise compliance with the labor legislation at the national level, it is expected that the national labor and OHS laws will be complied with during project implementation. Employers participating in ATP will be responsible to comply with İŞKUR policies on ATP, national labor and social insurance laws, and with provisions of this LMP related to project beneficiaries. With regard to TRC, Human Resources Department of TRC will have the overall responsibility for applying all aspects of Labor Management Procedures, to the staff working for the project. The employers participating in the ATP will be required to verify the age of all workers. This will require workers to provide official documentation, which could include a national identification card, passport, birth certificate, certificate based on the results of a medical examination, or any other government issued document.

ESS3 Resource Efficiency and Pollution Prevention and Management

Not relevant for the scope of the project.

ESS4 Community Health and Safety

Although the project activities do not contain any risk in terms of CHS, SEA/SH risks are assessed as Low as per Bank's online SEA/SH risk assessment tool. In addition, additional measures have been included both in LMP and SEP to mitigate potential SEA/SH risks. Grievance mechanisms of IAs (MoFLSS, İSKUR and TRC) have procedures in place to receive work related SEA/SH issues as well as other harassment types. There are also gender sensitization trainings included for the staff under the Project as well as for the employers. During project implementation, further capacity needs to manage and respond to grievances related to SEA/SH issues in both project and worker's grievance mechanisms will be supervised and if need be, additional measures will be brought in by the IAs for strengthening.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not relevant as there will be no land acquisition involved in the project.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Not relevant as there will be no impact on biodiversity.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Not applied in Turkey as there are no groups meeting the definition of this standard.

ESS8 Cultural Heritage

The project will not have any impact on cultural heritage.



ESS9 Financial Intermediaries

No financial intermediaries are involved in this project, as it will be implemented by Ministry of Family, Labor and Social Services including Turkish Employment Agency.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

Project will rely on the Turkish labor code and the regulations of MoFLSS and ISKUR as they will be the main implementing agencies of the project for formal employment and registry, work place adaptation programs. For gaps related to workers grievances, GBV related issues and stakeholder engagement Bank's standards will apply.

IV. CONTACT POINTS

World Bank

Contact: Mirey Ovadiya Title: Senior Social Protection Specialist

Telephone No: 5258+87841 Email: movadiya@worldbank.org

Contact: Sirma Demir Seker Title: Senior Economist

Telephone No: 5242+8370 / 90-312-4598370 Email: sdemirseker@worldbank.org

Borrower/Client/Recipient

Borrower: Turkish Red Crescent (TRC)

Borrower: Ministry of Family, Labor and Social Services

Implementing Agency(ies)

Implementing Agency: Turkish Employment Agency (ISKUR)

Public Disclosure



V. FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: <http://www.worldbank.org/projects>

VI. APPROVAL

Task Team Leader(s):	Mirey Ovadiya, Sirma Demir Seker
Practice Manager (ENR/Social)	Varalakshmi Vemuru Cleared on 19-Feb-2021 at 08:46:46 GMT-05:00