



**Republic of Türkiye**

**Ministry of Environment, Urbanization and Climate Change**

**TÜRKİYE EARTHQUAKE RECOVERY &  
RECONSTRUCTION PROJECT-ADDITIONAL  
FINANCING (TERRP-AF)  
(P180849)**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**DRAFT**

**NOVEMBER 2024**

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## **ABBREVIATIONS AND ACRONYMS**

<b>AFAD</b>	: Disaster and Emergency Management Presidency
<b>AFD</b>	: French Development Agency (The Agence Française de Développement)
<b>CİMER</b>	: The Communication Center of the Presidency
<b>E&amp;S</b>	: Environmental and Social
<b>ESCP</b>	: Environmental and Social Commitment Plan
<b>ESF</b>	: Environmental and Social Framework
<b>ESMF</b>	: Environmental and Social Management Framework
<b>ESMP</b>	: Environmental and Social Management Plan
<b>ESS</b>	: Environmental and Social Standards
<b>GBV</b>	: Gender-Based Violence
<b>GDCA</b>	: Directorate General of Construction Affairs
<b>GRM</b>	: Grievance Redress Mechanism
<b>GRS</b>	: Grievance Redress Service
<b>GT</b>	: Government of Türkiye
<b>LMP</b>	: Labor Management Procedures
<b>MoAF</b>	: Ministry of Agriculture and Forestry
<b>MoENR</b>	: Ministry of Energy and Natural Resources
<b>MoEUCC</b>	: Ministry of Environment, Urbanization and Climate Change
<b>MoH</b>	: Ministry of Health
<b>Mol</b>	: Ministry of Interior
<b>MoT</b>	: Ministry of Trade
<b>MoTI</b>	: Ministry of Transport and Infrastructure
<b>MoYS</b>	: Ministry of Youth and Sports
<b>PAP</b>	: Project-Affected People
<b>PDoEUCC</b>	: Provincial Directorate of Environment, Urbanization and Climate Change
<b>PIU</b>	: Project Implementation Unit
<b>POM</b>	: Project Operational Manual
<b>RF</b>	: Resettlement Framework
<b>RP</b>	: Resettlement Plan
<b>SEA/SH</b>	: Sexual Exploitation and Abuse/Sexual Harassment
<b>SEP</b>	: Stakeholder Engagement Plan
<b>TERRP</b>	: Türkiye Earthquake Recovery and Reconstruction Project
<b>WB</b>	: World Bank

## EXECUTIVE SUMMARY

Two earthquakes with a magnitude of 7.8 Mw ( $\pm 0.1$ ) 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. In the provinces of Tunceli, Bingöl, Mardin, Batman, Kayseri, Niğde and Sivas, which were affected by these two major earthquakes, about 3000 rural housing units are planned to be construct with additional financing from World Bank (WB) and French Development Agency (AFD).

Türkiye Earthquake Recovery and Reconstruction Project (TERRP) is an emergency project funded by the WB and AFD and implemented by the Ministry of Environment, Urbanization and Climate Change (MoEUCC) in cooperation with the Disaster and Emergency Management Presidency (AFAD). The main objective of the project is the reconstruction of collapsed or severely damaged village houses in rural areas. The project aims to reconstruct approximately 3000 rural houses in the above mentioned provinces.

This document has been prepared to describe the ways of communication with stakeholders who will be directly or indirectly affected by the Project within the scope of the TERRP. The stakeholder engagement plan (SEP) is a map that will enable stakeholders to participate in the project and communicate their views, requests, and complaints to the Project Implementation Unit. The SEP outlines the general principles and collaborative strategy (i) to identify stakeholders for all components of the Project, (ii) to identify appropriate modes of engagement, and (iii) to prepare plans for engagement and meaningful consultation throughout the project cycle while ensuring transparency. The goal of the SEP is to improve and facilitate decision-making and create an atmosphere of understanding that actively involves project-affected people (PAPs) and other stakeholders on time and that these groups are provided sufficient opportunity to voice their opinions and concerns.

This SEP outlines the process of stakeholder identification duly considering all stakeholders relevant to the Project including its components and sub-components. The identified stakeholders include those currently associated with the Project and those who will be associated with the Project at a later stage during implementation. Stakeholders are identified and categorized under three groups: i) project-affected parties, ii) other interested parties, and iii) disadvantaged and vulnerable groups. The framework provides details of the systematic consultation with the project-affected people, women, vulnerable and poor members of the community, and other stakeholders to understand their interests and influence over the project.

## 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 in accordance with the World Bank's ESS10, called "*Stakeholder Engagement and Information Disclosure*". In addition, during the preparation of the document, meetings were held with AFD and WB officials regarding the content to be included in the document.

As is known, two major earthquakes with a magnitude of 7.8 Mw ( $\pm 0.1$ ) 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. Presidential Decree No. 6785 declared the earthquake-affected provinces of Kahramanmaraş, Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kilis, Malatya, Osmaniye, Elazığ and Şanlıurfa as disaster areas. Later, the provinces of Tunceli, Bingöl, Mardin, Batman, Kayseri, Niğde and Sivas were added to the list. Within the scope of co-financing, approximately 3000 rural houses are planned to be construct for earthquake victims in Tunceli, Bingöl, Mardin, Batman, Kayseri, Niğde and Sivas, which were added to the list later.

This project will provide co-financing to only 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.

The Project will be implemented by the MoEUCC through the Directorate General of Construction Affairs (GDCA). This department currently consists of approximately 40 technical staff (procurement, financial management, engineers) and 4 individual consultants hired to manage the environmental-social and OHS process.

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 WB and AFD's 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 TERRP throughout the project life cycle. It also describes a grievance redress 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 Tunceli, Bingöl, Mardin, Batman, Kayseri, Niğde, and Sivas approximately 3000 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 , including assessment studies, design/supervision consultancy, and works.
- 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.

### b. PROJECT LOCATIONS

The two earthquakes with a magnitude of 7.8 Mw ( $\pm 0.1$ ) and 7.5 Mw occurred on February 6, 2023, nine hours apart, with epicenters in 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 Project will be carried out in the provinces of Tunceli, Bingöl, Mardin, Batman, Kayseri, Niğde and Sivas shown in the map provided in Figure 2 given below.



Figure 1. Project Provinces

### **3. REGULATORY FRAMEWORK**

#### **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 their 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 the condition that observance, on their own or with the wishes and complaints of 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. The 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 following 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 a written petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using the 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.

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.

## **b. 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 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 redress mechanism (GRM) to receive and facilitate the resolution of suggestions and complaints. The scope, scale, and type of the required GRM will be proportionate to the nature and scale of the potential risks and impacts of the project. The GRM may include: (i) enable submission of grievances 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 acknowledgment, 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 the 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 by MoEUCC. Details of these informative meetings are provided in

Table 8 given below.

**Table 1. Stakeholder engagement meetings held by MoEUCC**

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

Within the scope of TERRP, 54 stakeholder engagement meetings held for 64 different locations so far. In some sub-projects, combined stakeholder engagement meetings were held due to the proximity of villages to each other. In some locations, separate meetings were organised for women due to the limited participation of women in the stakeholder engagement meetings. Stakeholder engagement meetings were not organised for Dessup-04 Group-2, 3 and Dessup-05 Group-4 as the tender bidding process was not completed. In addition, a stakeholder engagement meeting was not organised for Dessup-02 Kahramanmaraş Tatlar (Yeni) Neighbourhood due to the uncertainty regarding the parcels. A stakeholder engagement meeting will be organised in Tatlar (Yeni) neighbourhood once the uncertainties regarding the parcels are resolved. The stakeholder engagement meetings held since the start of TERRP are detailed in the Table 2 below.

Table 2. Stakeholder engagement meetings held under TERRP

Dessup	Province/District/Village	Number of Rural Houses to be Construct	Date of the Meeting	Number of Participants		
				Male	Female	Total
<b>Dessup-01 Malatya</b>	Pütürge & Doğanyol Districts Cluster-1	105	06.11.2024	11	5	16
	Pütürge & Doğanyol Districts Cluster-2		05.11.2024	25	9	34
	Pütürge & Doğanyol Districts Cluster-3		05.11.2024	24	8	32
	Akçadağ District Ören Neighborhood	287	09.11.2023	70	86	156
<b>Dessup-02 Kahramanmaraş</b>	Nurhak District Karşıyaka (Fatih) Neighborhood	92	28.09.2024	12	15	27
	Nurhak District Bahçelievler (Kullar) Neighborhood	151	29.09.2024	12	18	30
	Nurhak District Tatlar (Yeni) Neighborhood	68	-	-	-	-
	Afşin District Büyüktatlar Neighborhood	23	30.09.2024	18	4	22
	Afşin District Küçüktatlar Neighborhood	29	30.09.2024	13	3	16
	Çağlayancerit District Soğukpınar Neighborhood	10	01.10.2024	52	2	54
	Dulkadiroğlu District Başdervişli Neighborhood	86				
<b>Dessup-03 Elazığ Group-1</b>	Gürçubuk	14	16.07.2024	17	13	30
	Halkalı	10	16.07.2024	7	13	20
	Çevrecik	17	17.07.2024	8	20	28
	Saman	36	17.07.2024	15	14	29
	Haberci	2	17.07.2024	13	6	19
<b>Dessup-03 Elazığ Group-2</b>	Bakladamlar	10	16.07.2024	18	6	24
	Çakmakkaya	38	04.04.2024	26	15	41
	Erimli	38	03.04.2024 16.07.2024	24	10	34
	Kambertepe	56	03.04.2024	19	9	28
	Ormanpınar	29	03.04.2024	27	5	32
<b>Dessup-03 Elazığ Group-3</b>	Poyraz	1	18.07.2024	17	9	26
	Üçağaç	5				
	Alpavut	3				

Dessup	Province/District/Village	Number of Rural Houses to be Construct	Date of the Meeting	Number of Participants			
				Male	Female	Total	
	Yukarıçakmak	2	18.07.2024	21	6	27	
	Cip	19					
	Alaca	9					
		Altıkuşak	3	19.07.2024	18	12	30
		Alatarla	1				
		Çamyatağı	13				
		Salkaya	2				
<b>Dessup-03 Group-4 (Gündüzbey)</b>	Yeşilyurt District Gündüzbey Neighborhood	224	14.09.2024	61	81	142	
<b>Dessup-04 Adıyaman Group-1</b>	Gölyurt, Yenibardak, Dallarca and Onevler villages	80	30.07.2024	64	15	79	
<b>Dessup-04 Adıyaman Group-2</b>	-	-	-	-	-	-	
<b>Dessup-04 Adıyaman Group-3</b>	-	-	-	-	-	-	
<b>Dessup-05 Elazığ Group-1</b>	Değirmenönü	8	11.09.2024	23	12	35	
	Yolüstü	18	10.09.2024	20	10	30	
	Dereboğazi	19	11.09.2024	10	9	19	
	İçme	44	10.09.2024	15	19	34	
	Korucu	29	11.09.2024	12	9	21	
	Kumla	19	10.09.2024	15	6	21	
	Sarıkamış	35	10.09.2024	25	12	37	
	Şahsuvar	9	01.10.2024	8	1	9	
<b>Dessup-05 Elazığ Group-2</b>	Aydıncık	15	13.09.2024	12	8	20	
	Gümüşbağlar	31	13.09.2024	22	11	33	
	Karataş	6	12.09.2024	11	2	13	
	Pelte	10	12.09.2024	30	8	38	
	Sedeftepe	8	11.09.2024	18	9	27	
	Serince	19	12.09.2024	13	14	27	
	Uzuntarla	31	12.09.2024	9	3	12	
<b>Dessup-05 Elazığ Group-3</b>	Bağlarca (Nekerek)	8	30.09.2024	15	6	21	
	Balıca	7	01.10.2024	6	7	13	
	Çalıca	14	30.09.2024	14	6	20	
	Kavaktepe	10	01.10.2024	7	2	9	

Dessup	Province/District/Village	Number of Rural Houses to be Construct	Date of the Meeting	Number of Participants		
				Male	Female	Total
	Kuyulu	18	02.10.2024	19	2	21
	Sarıllı	11	30.09.2024	18	2	20
	Tadım	15	01.10.2024	15	3	18
	Yedigöze	12	02.10.2024	25	4	29
	Yukarıdemirtaş	12	01.10.2024	31	22	53
	Bağdere	4	30.09.2024	9	4	13
	Gölköy	4	30.09.2024	14	7	21
	Işıkolu	5	30.09.2024	12	6	18
<b>Dessup-05 Elazığ Group-4</b>	-	-	-	-	-	-

The key findings from the stakeholder engagement meetings held so far within the scope of TERRP are listed below:

- In all the sub-projects, the main expectation of the stakeholders was that the earthquake-resistant rural houses should be completed as soon as possible and that the bureaucratic process should be shortened.
- In the villages where TERRP meetings were held, particularly in the provinces of Elazığ and Kahramanmaraş, stakeholders stated that they needed barns and warehouses and asked the authorities to provide these facilities to the villages as soon as possible.
- Another issue raised during the meetings was the confusion between other earthquake projects in the region and the work carried out under TERRP. Stakeholders were informed about this issue and the activities carried out under TERRP were explained.
- Another issue that came to the fore during the meetings was the problem of right ownership. As AFAD is the relevant authority on right ownership, stakeholders were directed to the relevant units of AFAD.
- The participation of women stakeholders in the meetings was low due to the social, cultural and religious structure of the region. To ensure women's active participation in the process, informative meetings were also organised for women in the houses. TERRP social experts visited the houses, provided information to the women stakeholders and conducted interviews with disadvantaged families.
- Sub-project specific SEPs are not prepared under TERRP. The main objective of the meetings organised is to ensure a regular stakeholder engagement for the parent project.

## 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 3 summarizes the potential interests and influence of each of the above-mentioned affected parties.

**Table 3. Identified stakeholder groups for the TERRP**

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



## 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 TERRP, all affected parties will be informed about the Project's scope, contact information (GRM), 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 of how communication and engagements are handled, especially when working with vulnerable groups and people who are still recovering from post-disaster trauma.

In the TERR Project, the stakeholder engagement programme is already working effectively, both through the grievance redress mechanism and through personal engagement with beneficiaries in the site. Beneficiaries have easy access to the social experts of the consulting companies and the social experts of the PIU. In particular, the publication of the PIU social specialist's office telephone number on posters and brochures enables stakeholders to contact the PIU directly, and stakeholders welcome this practice. The same stakeholder engagement methods will be used in the project to be implemented with additional financing. However, the stakeholder engagement programme can be updated according to the needs of the site and stakeholders. The earthquake on February 6, 2023, caused devastation in 18 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 carried out.

One of the main challenges faced in stakeholder engagement activities in rural areas is to meet stakeholders in a common language frequency. In this respect, it is very important that experts who correctly interpret their religious and cultural codes and daily habits take part in the field. As PIU, we attach great importance to this issue. We provide trainings to our experts assigned in each sub-project in advance, but more frequent and comprehensive trainings will make great contributions to the progress of stakeholder engagement activities in a positive line.

Another issue that created difficulties in the stakeholder engagement process was the other earthquake projects carried out in the neighbouring areas. Stakeholders had difficulty in distinguishing the projects from each other. Different designs applied in housing construction caused both confusion and an increased sense of inequality among stakeholders. To avoid this, housing designs should be uniform across the region. This points to more of a planning problem. By developing a more inclusive and egalitarian implementation framework, these and similar problems can be eliminated.

## 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, 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 individuals/groups as well as the suggested stakeholder engagement methods for each disadvantaged/vulnerable individual/group. The stakeholder categories, including the disadvantaged/vulnerable individuals/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**

Vulnerable Groups and Individuals	Features/Needs	The preferred method for information sharing and consultation	Additional Resource Support
Disabled individuals	Funding for training to assist individuals with a 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 inaccessible areas	Not necessary
Immigrants, refugees, and non-native Turkish speakers	Those who have difficulties in communication	Translated documents, special translators, communication inaccessible areas	Translators
Pregnant women and/or women with young kids  Female-headed households	Accessibility, lack of information	Communication in accessible venues, methods	N/A
Children	Safety, and appropriateness of communication and facilitation	Trained facilitators	Tailored communication media and approach

Vulnerable Groups and Individuals	Features/Needs	The preferred method for information sharing and consultation	Additional Resource Support
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 5 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 the involvement of all stakeholder groups. The engagement activities will be carried out in a culturally appropriate manner and will include the best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

**Table 5. Engagement methods to be employed under the TERRP**

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> <li>- Information sharing (in particular technical) on project requirements and impacts</li> <li>- Invitations to meetings and key events during project implementation</li> <li>- Arrangements for obtaining permits, licenses, transfer, and allocation of project land</li> <li>- Information and data requests that will be utilized for project implementation</li> </ul>	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"> <li>- Information collection on an individual basis allows stakeholders to voice their concerns/opinions about sensitive issues</li> <li>- Establishing personal connections with key actors</li> </ul>	Representatives of relevant state authorities and government officials, NGOs, local government, academia, organizations/agencies, contractors and consultants
Formal meetings	<ul style="list-style-type: none"> <li>- Collective information sharing on project requirements and impacts</li> <li>- Receiving comments, feedback, views and perception of the project from a group of public institutions</li> <li>- Establishing relations with public institutions</li> </ul>	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"> <li>- 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.</li> <li>- Receiving comments, feedback, views and perception of the project from a group of stakeholders</li> <li>- Collecting grievances and concerns related to the project</li> <li>- Establishing relations with affected communities, and groups</li> <li>- women's meetings (if needed)</li> </ul>	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"> <li>- Collecting baseline data on an individual basis about project-affected people (PAPs) impacted by the project</li> <li>- Understanding, monitoring and assessing the project activities' environmental and social impacts and risks on an individual basis</li> <li>- Establishing relations on an individual basis</li> </ul>	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"> <li>- Information sharing on a specific topic to a certain group of people including vulnerable groups</li> <li>- Receiving comments, feedback, views and perception of the project from a certain group</li> <li>- Collecting grievances and concerns related to the project from a certain group</li> <li>- Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders</li> <li>- Establishing relations with certain groups</li> </ul>	Stakeholder groups relevant to the information to be shared and discussed during the meeting, vulnerable groups
MoEUCC website	<ul style="list-style-type: none"> <li>- Sharing project-relevant information and update on progress</li> </ul>	Any stakeholder group identified throughout the project including affected communities and PAPs,

Engagement Method	Application/Purpose of the Method	Target Stakeholder
	<ul style="list-style-type: none"> <li>- Disclosing project/subproject related documentation and communication tools: Environmental and Social Management Plan (ESMP), Occupational Health and Safety (OHS) Plan , Ex-Post social audit document, grievance mechanism (GM), presentations, brochures, etc.</li> <li>- Announcements of key events (date/time, venue)</li> </ul>	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"> <li>- Non-technical information sharing and progress updates</li> <li>- Announcements of key events, dates and published documents related to the Project</li> </ul>	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"> <li>- Sharing brief project information to provide regular updates</li> <li>- Informing the stakeholders on certain issues such as land acquisition, land entry and exit, project implementation schedule, the scope of project activities and subprojects, etc.</li> <li>- Disseminating site-specific project information</li> </ul>	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"> <li>- Information sharing on a specific topic to a group of people including vulnerable groups</li> <li>- Receiving comments, feedback, views, and perception regarding the project from a certain group</li> <li>- Collecting grievances, concerns and feedback related to the project from a group</li> <li>- Monitoring project activities' environmental and social impacts and risks on a group</li> <li>- Establishing relations with local communities</li> </ul>	Any stakeholder group identified throughout the project, including project-affected people, vulnerable groups, etc.
Grievance Redress Mechanism (GRM)	<ul style="list-style-type: none"> <li>- Receiving and resolving any requests (such as suggestions, complaints, compliments, inquiries for information or whistle-blower complaints) received by all project stakeholders</li> </ul>	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, and 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 Redress Mechanism (GRM). The goal of the GRM is to strengthen accountability to and the people and to provide channels for project

stakeholders to provide feedback and/or express their concerns and grievances related to project activities. Detailed information about GRM 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, GRM 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 the dissemination of sufficient information to all stakeholders about project activities. In addition to this information, the housing types that will be offered to the preference of the right owners will also be available on the website.

**Table 6. The overview of the stakeholder engagement program**

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



#### **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 GRM will be in place during the entire lifetime of the project to receive any concerns from both internal and external stakeholders.

The ongoing TERRP has received feedback from stakeholders on many issues. The most common complaints/opinions/suggestions received by the PIU are listed below:

- Problems related to right right holdership;
- Dust caused by construction machinery;
- Damage to the village road by construction machinery;
- Lack of appreciation for the implementation of the project;
- Demand for more housing.

## 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.

Table 7 given below presents the roles and responsibilities of different parties to be involved in TERRP.

**Table 7. Responsibilities of key actors/stakeholders in SEP implementation**

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

<b>Supervision Consultant</b>	<ul style="list-style-type: none"><li>• Preparing respective E&amp;S instruments (ESMP, ESMP Checklist, , , OHS Plan, etc.) for the project activities</li><li>• Ensuring that the project adheres to the methodology and other requirements which are mentioned in E&amp;S Documents (ESMP, OHSP, SEP ) during the implementation of sub-projects</li><li>• Monitoring the contractors' activities on site (including recording and resolution of grievances, and reporting these to PIU in their monthly progress reports)</li><li>• Contacting with PIU GRM Contact Person for the follow-up of the grievances</li></ul>
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## 8. GRIEVANCE REDRESS MECHANISM

The Grievance Redress Mechanism (GRM) 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 Redress Mechanism (GRM) has been established and implemented during the project life cycle.

The goal of the GRM 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 GRM is a mechanism that allows also for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GRM 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 are 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 GRMs of the Republic of Türkiye.

- a. Contractor: Each contractor appointed for conducting the civil works is 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 is also require contractors to develop and implement a grievance redress 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 are also submit the records including solved and unsolved concerns and grievances to the PIU on a weekly basis.
- b. Supervision Consultant: The concerns and grievances that cannot be addressed by the contractor are 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 is 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 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. Türkiye has different GRMs available at the 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 GRM

The MoEUCC/PIU operates 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](mailto:yigmkadev@csb.gov.tr)) that will be available on the website, the PIU collects grievances from all stakeholders. The principle of confidentiality and the right to make anonymous complaints are ensured.

Grievance/concern/suggestions collected through different channels are recorded by the MoEUCC and responded to within 15 days. Records of the grievance/concern/suggestion are 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 is available on construction sites that are easily accessible to all relevant stakeholders. The principle of confidentiality and the right to make anonymous complaints are 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 record grievance information in a grievance log. This will include:
- Stakeholder name and contact details. (Personal details are not 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) are revealed on the:

- Websites of the GDCA and/or relevant government authorities, where the project activities are 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.

<b>MoEUCC Call Center</b>	Alo 181
<b>Telephone of PIU's Social Specialist</b>	+ 90 312 586 48 27
<b>Grievance Forms</b>	<a href="https://kadiyaponeri.csb.gov.tr/kadiyapOneri.jsp?authorizationKey=91ed7a16-209f-4ada-a42f-46892f6a4440">https://kadiyaponeri.csb.gov.tr/kadiyapOneri.jsp?authorizationKey=91ed7a16-209f-4ada-a42f-46892f6a4440</a>
<b>E-mail</b>	<a href="mailto:yigmkadev@csb.gov.tr">yigmkadev@csb.gov.tr</a>

The grievance log has all the necessary elements to disaggregate the grievance by gender of the person submitting it as well as by type of grievance. Each grievance is 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 assists and provides 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 is 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 I provides a detailed explanation/ justification to the complainant on why the issue was not addressed. The response also includes 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 ongoing World Bank-financed projects which is provided in ANNEX 4.

## 8.2. NATIONAL LEVEL GRM

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

### 8.2.1. PRESIDENCY’S COMMUNICATION CENTER (CİMER)

The CİMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CİMER 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.

<b>Webpage</b>	<a href="http://www.cimer.gov.tr">www.cimer.gov.tr</a>
<b>Call Center</b>	150
<b>Phone Number</b>	+90 312 525 55 55
<b>Fax Number</b>	+90 312 473 64 94
<b>Mail Address</b>	The Republic of Türkiye, Directorate of Communications
<b>Individual applications</b> at the community relations desks at governorates, ministries and district governorates	

### 8.2.2. FOREIGNERS COMMUNICATION CENTER (YİMER)

The YİMER has been providing a centralized complaint system for foreigners. YİMER 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.

<b>Webpage</b>	<a href="http://www.yimer.gov.tr">www.yimer.gov.tr</a>
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<b>Call Center</b>	157
<b>Phone Number</b>	+90 312 157 11 22
<b>Fax Number</b>	+90 312 920 06 09
<b>Mail Address</b>	The Republic of Türkiye, Directorate of Communications
<b>Individual applications</b>	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 to address project-related concerns. Project-affected communities and individuals may submit their complaints to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB's 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 allowed 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](http://www.inspectionpanel.org).

### **8.4. WORKERS' GRM**

A separate grievance mechanism is available for the workers, through which they are 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. Awareness raising on gender-based violence (GBV) and abuse in the workplace, especially for women workers (both on site and in the buildings under the project) and the establishment of a GRM hotline is emphasised.. There are also awareness-raising discussions with both men and women regarding appropriate workplace behavior.

The MoEUCC/PIU and Supervision Consultant have developed and are implementing a grievance mechanism for their workforce including sub-contractors, before the start of work. The workers' grievance mechanism includes; (i) a procedure describing the flow of the GRM, (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 Consultant and Contractor's employees can approach the PIU for their grievances through the project website.

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

The workers are informed about the existence of the grievance redress mechanism which is 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 is described during the staff induction trainings, which will be provided to all project workers.

The mechanism is based on the following principles:

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

Information about the existence of the workers’ grievance mechanism is 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 are distributed to workers, social media and other means as needed. The Project grievance mechanism does not prevent project workers to use other judicial or administrative remedies available under the law.

The project and workers’ grievance redress mechanism has been established by Project effectiveness. GDCA has developed and adapted its current grievance and complaints procedures and mechanisms to the requirements of the Project. The PIU is responsible for managing the grievance redress mechanism and responding to grievances and complaints received in the scope of the Project.

In addition, the project GRM includes a channel with specific measures to receive and address confidential grievances related to lack of Sexual Exploitation, Abuse/Sexual Harassment measures.

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

Although the risk from project activities is moderate, the grievance mechanism includes handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints. The GRM in place for project staff is also used to address SEA/SH issues and has confidential reporting mechanisms with safe and ethical documentation of SEA/SH issues..

The project GRM includes 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 GRM also has a reporting line on such cases concerning SEA/SH issues and is handled under full confidentiality and with the consent of the survivor. When the MoEUCC/PIU receives a SEA/SH related grievance, these grievances are immediately referred to national referral systems and recorded.. All details of the complainant of the sensitive case are kept strictly confidential.

## **8.6. GRM PROCEDURE**

### **8.6.1. GRIEVANCE LOG**

The PIU’s Social Expert and contact person keeps 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 complaint,
- 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 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.

#### **8.6.1.1. 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 prepares Monitoring Reports to be submitted to WB in 6 monthly periods. The supervision Consultant is 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 GRM to the PIU.

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

- Status of GRM 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 is 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 is the focal point for GRM 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 1. Grievance Form

<b>Reference No</b>		
<b>Full Name (not mandatory, you can submit anonymously)</b>		
Please mark how you wish to be contacted (by mail, telephone, or e-mail).		
<b>Province/District/Location</b>		
<b>Date</b>		
	<b>Category of the Grievance</b>	
	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):	
	<b>Description of the Grievance</b> What did happen? When did it happen? Where did it happen? What is the result of the problem?	
	<b>What would you like to see happen to resolve the problem?</b>	

	<i>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.</i>

Signature:

Date:

**ANNEX 2. Grievance Closeout Form**

Grievance closeout number:	
Define immediate action required:	
Define long-term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <span style="margin-left: 200px;"><input type="checkbox"/> NO</span>
<b>CONTROL OF THE REMEDIATE ACTION AND THE DECISION</b>	
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 Signatur*

**ANNEX 3. 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, MoEUC 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 for resolution	Action Planned	Due Date for Addressing the Grievance		Closed Date of Grievance	

## ANNEX 4. Existing GDCA Grievance Redress Mechanism

### Introduction

The Grievance Mechanism (GRM) 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 GRM 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 GRM:

- 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 Redress Mechanism for the stakeholders is given in Figure 2.



**Figure 2. Operational Flow of Grievance Redress 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 GRM 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)]<sup>1</sup> 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.

The GRM 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 GRM 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 GRM contact person.

The GRM contact person who will oversee the entire process will be assigned as a part of the project team of the MoEUCC. GRM'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 GRM to ensure its smooth functioning within the scope of the project.

Table 8 presents the responsible parties and their roles/responsibilities for the GRM implementation.

**Table 8. Responsible parties in grievance mechanism implementation at each defined level**

Responsible Party	Responsibilities
<b>Ministry of Environment, Urbanization and Climate Change/Project Implementation Unit (MoEUCC/PIU)</b>	<ul style="list-style-type: none"> <li>• The PIU will be responsible for the overall implementation, management, and coordination of this Standard Operating Procedure (SOP).</li> <li>• PIU will also guide and assist the relevant responsible parties to ensure the successful implementation of this SOP.</li> <li>• PIU will be responsible for continuous monitoring of each process of the stakeholder's requests to assure compliance with the GRM Procedure.</li> </ul>
<b>GRM Contact Person of the PIU</b>	<ul style="list-style-type: none"> <li>• Acting as the GRM contact person in the PIU.</li> <li>• Reviewing, and classifying whether the grievances are genuine/eligible and related to Project activities or not together with relevant member(s) of the PIU.</li> <li>• Establishing the main register and monitoring system for this SOP and following up on all grievances relevant to the Project.</li> <li>• Managing and coordinating the resolution of grievances within the Project.</li> <li>• Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding stakeholder engagement and other Project activities and coming up with actions.</li> </ul>

<sup>1</sup> 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.



	<ul style="list-style-type: none"> <li>• Coordinating and monitoring the GRM contact persons at the Contractor level.</li> <li>• Consolidating Project related requests received from different GRM levels.</li> <li>• Informing the PIU and the management about the resolution process.</li> <li>• Preparing consolidated GRM reports of the Project.</li> </ul>
<b>GRM Contact Person of the (Provincial Directorate of Ministry of Environment and Urbanization (PDoMoEUCC))</b>	<ul style="list-style-type: none"> <li>• Receiving project-related requests (complaints, compliments, feedback, inquiries for information, etc.).</li> <li>• Evaluating and addressing the complaints that fall into their area of responsibility by taking confidentiality and security measures.</li> <li>• Recording each request whether they are addressed or not on the register and monitoring system and convey the register log to the MoEUCC monthly.</li> <li>• Immediately notifying the MoEUCC/PIU if complaints have great significance (sexual abuse, workplace accident, etc.).</li> </ul>
<b>Social Specialists Supervision Consultants</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Monitoring the contractors' recording and resolution of grievances and reporting these to PIU in their monthly progress reports.</li> </ul>

## Dissemination of the Grievance Redress 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 affected by the Project.

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 GRM 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 Redress Mechanism?*

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

- Project's beneficiaries;
- Right owners affected by the earthquakes;
- 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 GRM 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 '161181' which is accessible via phone and website. This hotline serves also as a ministerial-level grievance redress

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.

Applicants can send their requests/suggestions/complaints to any of the following communication channels:

<b>MoEUCC Call Center</b>	Alo 181
<b>Telephone</b>	+ 90 312 586 48 27
<b>Grievance Forms</b>	<a href="https://kadiyaponeri.csb.gov.tr/kadiyapOneri.jsp?authorizationKey=91ed7a16-209f-4ada-a42f-46892f6a4440">https://kadiyaponeri.csb.gov.tr/kadiyapOneri.jsp?authorizationKey=91ed7a16-209f-4ada-a42f-46892f6a4440</a>
<b>E-mail</b>	yigmkadev@csb.gov.tr
<b>Provincial Directorates of Environment, Urbanization And Climate Change (PDoEUCC)</b>	Alo 181 TERRP Grievance Forms are disclosed on the official webpage of the respective PDoEUCC.
<b>Contractors</b>	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 (CİMER) to submit their concerns and grievances about the project implementation. The communication channels of CİMER are given below.

### Grievance Redress Mechanism Process

<b>Webpage</b>	<a href="https://www.cimer.gov.tr">https://www.cimer.gov.tr</a>
	<a href="https://giris.turkiye.gov.tr/">https://giris.turkiye.gov.tr/</a>
<b>Hotline</b>	Alo 150
<b>Phone</b>	+90 312 590 2000
<b>Fax</b>	+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 (right owners, host 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 Supervision Consultant weekly.
- 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. Besides, Supervision Consultant will also submit the records including solved and unsolved concerns and grievances to the MoEUCC on a monthly basis.

- c) **Provincial Directorates of Environment, Urbanization and Climate Change Level:** Provincial Directorates of Environment, Urbanization and Climate Change 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 MoEUCC, whether the issues are addressed or not.
- d) **MoEUCC Level:** 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 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 TERRP, right owners, surrounding residents, , etc.) due to the executed civil works will be logged in the Grievance Table (Annex 3) 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 GRM 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 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 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 monthly.

### **Grievance Registration Process of A10 181**

Headquarters of ALO 181 has been informed about the TERRP and it currently receives, and records all inquiries received on TERRP and conveys them to the PIU of the TERRP. 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 GRM 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 GRM are provided in Table 9.

Table 9. Steps to be taken for assessing, addressing, and closing the request for all parties of GRM

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><b>If the complaint is verbal</b>, 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><b>If the complainant is satisfied</b> 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"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If the agreement is ensured</b>, 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><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	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><b>If the management decides the grievance is relevant to TERRP activities and is eligible for assessment</b>, 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><b>If the management decides the complaint is NOT relevant to TERRP activities</b>, the Complainant will be informed; accordingly, guidance will be provided to contact the relevant party(-ies).</p>	Management of Contractor	<p><b>If the complainant is satisfied</b> with the answers and actions are taken, the Close-Out Form with corrective actions and explanations will be signed by the complainant.</p>	<p><b>If the complaint is eligible and there is disagreement, then</b> further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or face-to-face meetings would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If the agreement is ensured</b>, 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><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	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><b>After necessary revisions are made to the complaint to ensure it is detailed enough for assessment and the complaint is assessed</b>; <i>feedback including necessary actions taken will be sent to the complainant.</i></p>	Management of Contractor	<p><b>If the complainant is satisfied</b> with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.</p>	<p><b>Once the submitted request is clarified to be assessed under the Project's GM</b> 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"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If the agreement is ensured</b>, 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><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	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 GRM 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> <p>The final response will be prepared and shared with the complainant.</p>	PIU/MoEUCC	<p><b>If the complainant is satisfied with the explanation provided and actions are taken</b>, the Close-Out Form with corrective actions and explanations will be</p>	<p>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"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• <b>A virtual or face-to-face meeting</b> would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>

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
					signed by the complainant.	<p><i>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.</i></p> <p><i>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</i></p>	
	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	<p><b>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.</b></p>	<p><b>In case of disagreement, the complaint will be directed to the PIU.</b></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><b>If the worker is still dissatisfied</b> with the recommended additional actions or explanation, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
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	<p><b>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.</b></p>	<ul style="list-style-type: none"> <li>• A virtual or face-to-face meeting would be conducted with the worker to discuss, propose and agree on any other correction actions.</li> <li>• 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.</li> <li>• If the worker is still dissatisfied with the recommended actions of explanation, s/he will be informed about the appeal process.</li> </ul>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
Provincial Directorate of EUCC	If the complaint is related to the activities of an ongoing sub-project	Contact person of the PDoEUCC	<p><b>In case an answer/corrective action can be taken immediately;</b> 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	<p>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>	<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"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><i>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.</i></p> <p><i>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</i></p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>



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	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).  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.	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.	If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUC for further assessment.  <ul style="list-style-type: none"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>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.</b></p> <p><b>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</b></p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	If it cannot be ensured whether the complaint is eligible or not	PIU/MoEUC	Further-assessment will be made by PIU/MoEUC.  <b>If the PIU &amp; MoEUC decides the grievance is relevant to TERRE Project activities and is eligible for assessment,</b> the PIU focal point will assess the application and will draft a response to the Complainant with explanations and corrective actions to be taken.  Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.  <b>If the PIU &amp; MoEUC decides the grievance is NOT relevant to TERRE Project activities and is NOT eligible for assessment,</b> the Complainant will be informed; accordingly, guidance will be provided to contact the relevant party(-ies).	PIU Director	Feedback including necessary actions taken will be sent to the complainant.  <b>If the complainant is satisfied</b> with the answers and actions are taken, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUC for further assessment.  <ul style="list-style-type: none"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>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.</b></p> <p><b>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</b></p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	When the submitted grievance or concern is indefinite or not clear enough	GM Contact Person of the PIU	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.  <b>After necessary revisions are made to the complaint to ensure it is detailed enough for assessment and the complaint is assessed;</b> feedback including necessary actions taken will be sent to the complainant.	PIU Director	<b>If the complainant is satisfied</b> with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	<b>Once the submitted request is clarified to be assessed under the Project's GM</b> and if there is still a disagreement with the actions taken, further assessment will be taken by the PIU.  <ul style="list-style-type: none"> <li>• <b>A site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible.</li> <li>• The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>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.</b></p> <p><b>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</b></p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	When member/s of PIU issue a complaint	MoEUC General Directorate of Personnel	The PIU member will submit their grievances to the General Directorate of Personnel with a petition.  The General Directorate of Personnel will forward the grievance to any other department (rather than the "Internationally Funded Seismic Retrofitting Department") within the Ministry.	General Manager of GDCA	<b>If the complainant is satisfied</b> with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	<ul style="list-style-type: none"> <li>• <b>If the complainant does not satisfy with the solution,</b> s/he is informed about the appeal proses</li> </ul>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>



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 <b><i>Internationally Funded Seismic Retrofitting Department- General Directorate of Construction Affairs (IFSRDGDCA)</i></b>. 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 GRM'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 GRM 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, GRM'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

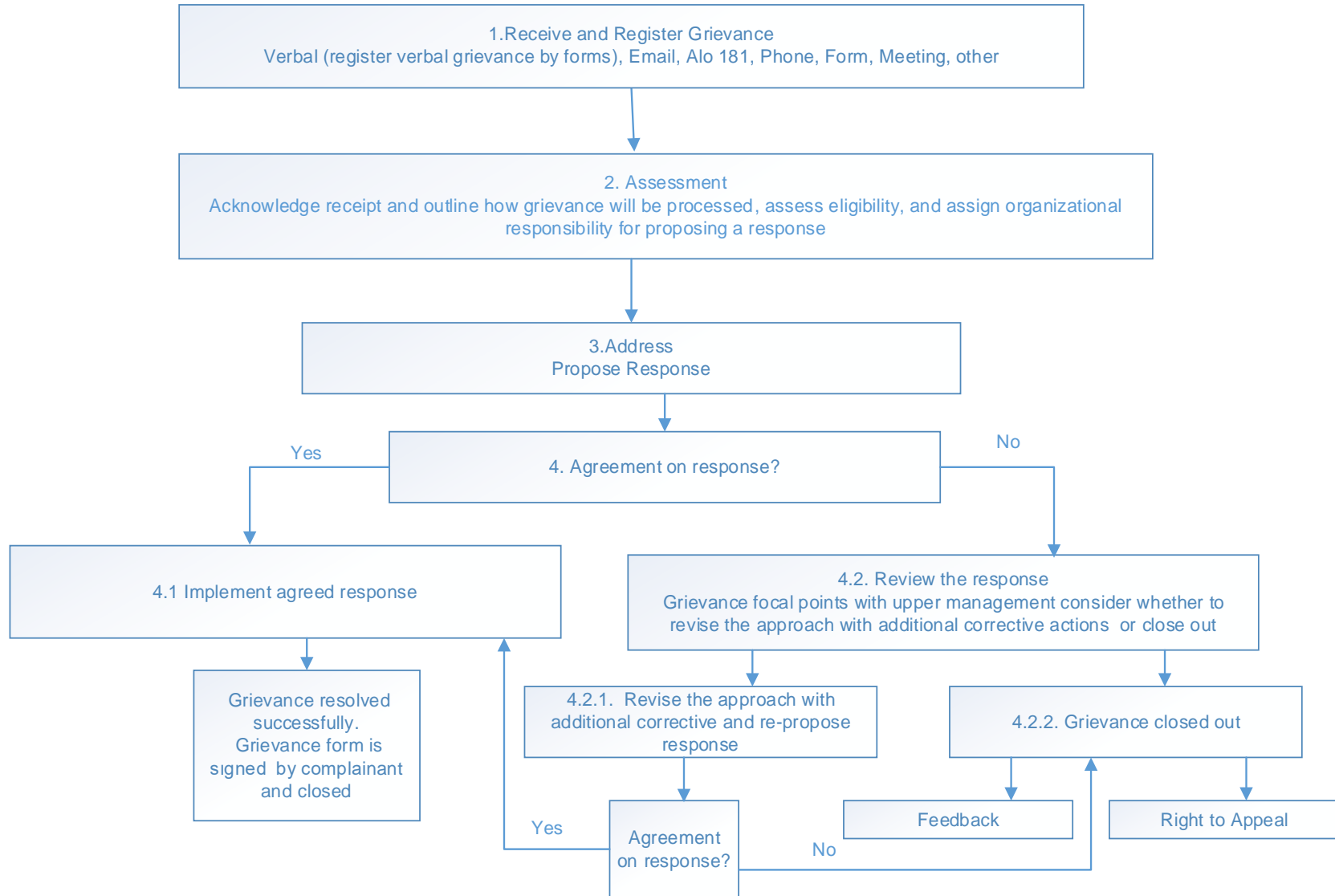
Responsible parties regarding GRM reporting and requirements on reporting process are provided in **Table 10**.

**Table 10. GRM reporting and requirements on reporting process**

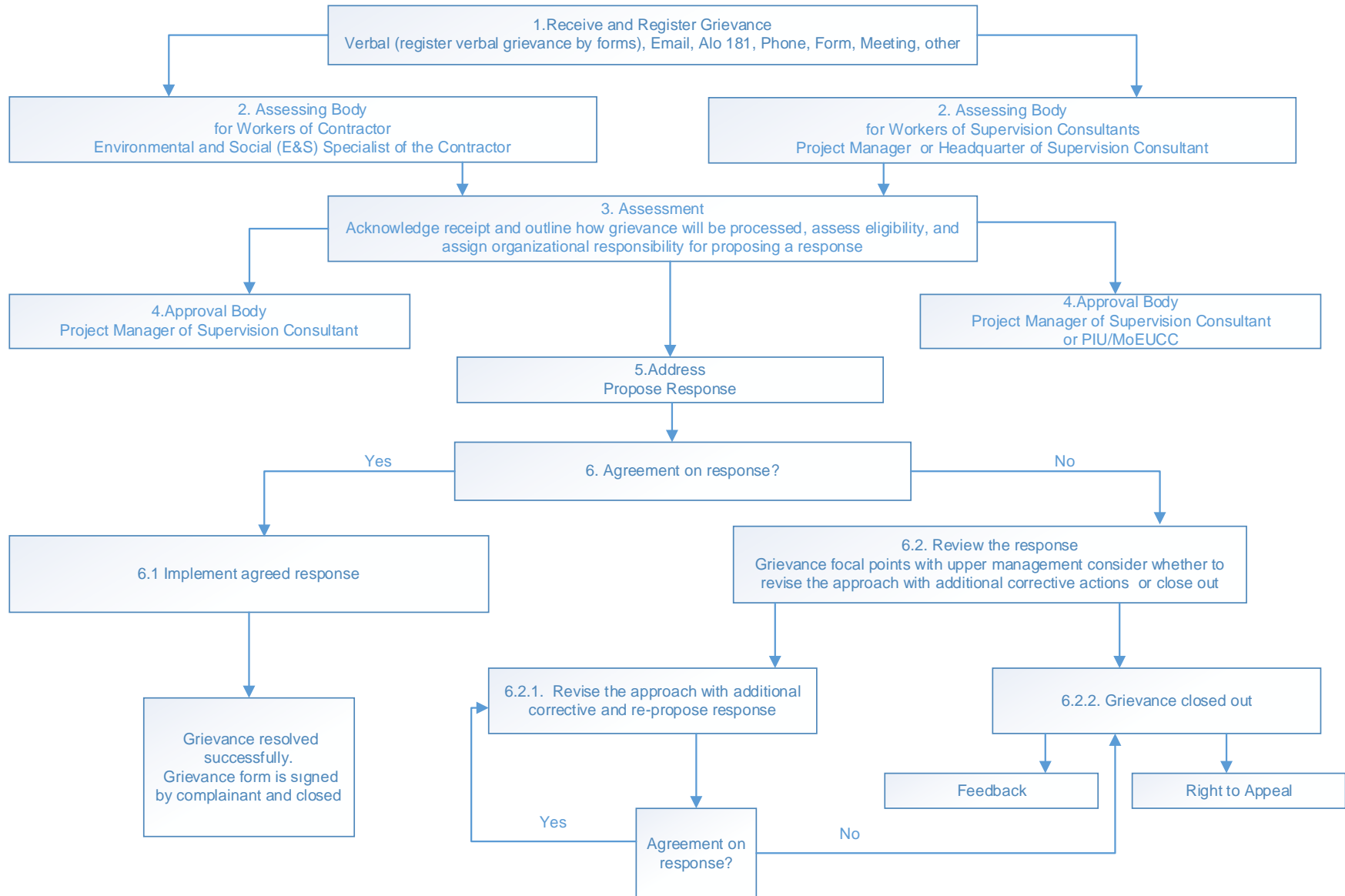
Responsible Party	Reporting Process Requirements
<b>Social Specialists of the Contractor</b>	Submit Monthly Reports to the Project Manager of Supervision Consultants, which shall include a Grievance Table as an annex related to GRM including updated information on the following: <ul style="list-style-type: none"> <li>• Quantitative data on the number of received applications (suggestions, complaints, requests, positive feedback), and the number of resolved grievances,</li> <li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li> <li>• Summary of corrective measures taken,</li> <li>• Disaggregated data (gender, province, etc.) about the received grievances.</li> </ul>
<b>Building Administration</b>	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.
<b>Supervision Consultants</b>	Submit Monthly Reports to the PIU, which shall include the contractor's report including, <ul style="list-style-type: none"> <li>• Quantitative data on the number of received grievances (applications, suggestions, complaints, requests, positive feedback), and number of resolved grievances,</li> <li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li> <li>• summary of corrective measures taken,</li> <li>• Disaggregated data (gender, province, etc.) about the received grievances.</li> </ul>
<b>PDoEUCC</b>	Submit the Grievance Table to the PIU on a weekly basis.
<b>The PIU's GRM contact person</b>	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"> <li>• Quantitative data on the number of received applications (suggestions, complaints, requests, positive feedback) from various intake channels (<b>PDoEUCC</b>, PIU, meetings, scorecards, Alo 181, online forms, etc.) and the number of resolved grievances,</li> <li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li> <li>• Summary of corrective measures taken,</li> <li>• Disaggregated data (gender, province, etc.) about the received grievances.</li> </ul>
<b>MoEUCC/PIU</b>	Submit biannually reports to the WB, which shall include a Grievance Table as an annex (Annex 2) related to the GRM including updated information on the following: <ul style="list-style-type: none"> <li>• Status of GRM implementation (procedures, training, public awareness campaigns, budgeting, etc.),</li> </ul>

	<ul style="list-style-type: none"><li>• Quantitative data on the number of received applications (, suggestions, complaints, requests, positive feedback), and the number of resolved grievances,</li><li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li><li>• Summary of corrective actions taken,</li><li>• Disaggregated data (gender, province, etc.) about the received grievances.</li></ul>
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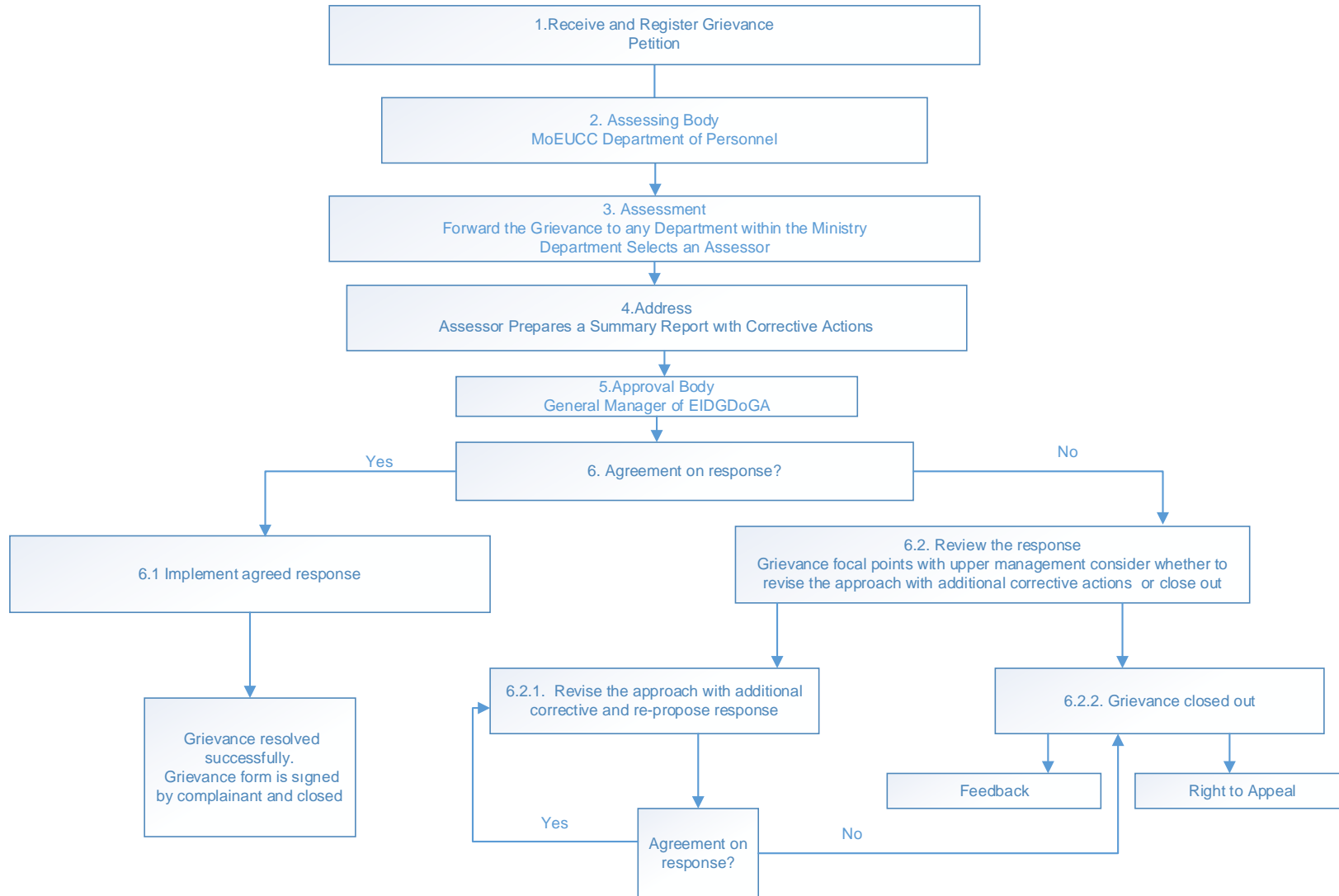
## GRIEVANCE REDRESS MECHANISM FLOWCHART



## WORKERS' GRIEVANCE REDRESS MECHANISM FLOWCHART



## PIU GRIEVANCE REDRESS MECHANISM FLOWCHART



## ANNEX 5. Photos of SEMs under TERRP

### SEM photos of Dessup-01 Malatya







SEM photos of Dessup-02 Kahramanmaraş







SEM Photos of Dessup-03 Elazığ









SEM Photos of Dessup-04 Adiyaman







SEM photos of Dessup-05 Elaziğ





