

REPUBLIC OF TURKEY
MINISTRY OF ENVIRONMENT AND URBANIZATION

STAKEHOLDER ENGAGEMENT FRAMEWORK
(SEF)

Seismic Resilience and Energy Efficiency in Public
Buildings Project
(SREEPBP)

MARCH 2021

GLOSSARY

Grievance Mechanism refers to the mechanism developed to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project, in particular about environmental and social performance of the project. It ensures that complaints and grievances are addressed through a transparent and impartial process.

Implementing Agency refers to the Ministry of Environment and Urbanization's General Directorate for Construction Works which will assume overall responsibility for the Project.

Project refers to Seismic Resilience and Energy Efficiency in Publing Buildings Project.

PIU refers to staff of General Directorate for Construction Works who are responsible for the implementation of the Project

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

Stakeholder engagement refers to a continuous process used by the project to engage relevant stakeholders to generate sense of ownership to the project and for a clear purpose to achieve accepted outcomes. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, stakeholder involvement in project monitoring, reporting to stakeholders and management functions. It includes both state and non-state actors.

Stakeholder Engagement Plan is a useful tool for managing communications with the project stakeholders. The goal of the SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

ABBREVIATIONS AND ACRONYMS

BP	Bank Procedure
CİMER	Presidency's Communication Center
EE	Energy Efficiency
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESSs	Environmental and Social Standards
E&S	Environmental and Social
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FM	Financial Management
GDCW	Directorate General of Construction Works
GM	Grievance Mechanism
GT	Government of Turkey
LA	Loan Agreement
MoENR	Ministry of Energy and Natural Resources
NDRMP	National Disaster Risk Management Project
OP	Operational Policy
PIIS	Turkish Public Investments Inventory System
PIU	Project Implementation Unit
POM	Project Operational Manual
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SREEPB	Seismic Resilience and Energy Efficiency in Public Building
WB	World Bank

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EXECUTIVE SUMMARY

The Ministry of Environment and Urbanization (MoEU) has applied financing from the World Bank toward the cost of the Seismic Resilience and Energy Efficiency in Public Buildings (SREEPB) Project. Project Loan will support improvements in seismic and disaster resilience and energy efficiency (EE) of central government and central government affiliated buildings through retrofitting and renovation or demolition and reconstruction. The proposed Project Development Objective (PDO) is to improve the disaster resilience and energy savings in selected central government buildings, and to strengthen the policy framework and institutional capacity to develop, finance and implement resilient and sustainable public buildings in Turkey.

As part of project implementation, it is required to engage with multiple and varied set of stakeholders for different activities under the project components. The environment and social risk category is assessed as "Moderate". Stakeholder Engagement Framework (SEF) is prepared to provide guidelines (including national and international legislations and requirements on stakeholder engagement), to the supervision consultants who will be responsible for preparation of sub-project specific Stakeholder Engagement Plans (SEPs). The SEF outlines the general principles and collaborative strategy (i) to identify stakeholders for all components of the Project, (ii) to identify appropriate modes of engagement, (iii) to prepare plans for engagement and meaningful consultation throughout the project cycle while ensuring transparency. The goal of the SEF is to improve and facilitate decisionmaking and create an atmosphere of understanding that actively involves project-affected persons (PAPs) and other stakeholders in a timely manner and that these groups are provided sufficient opportunity to voice their opinions and concerns. The SEPs will be prepared based on the SEF in accordance with the safeguard compliance requirements (ESS10) of Environmental and Social Framework (ESF). The SEF and SEP are living documents and shall be updated at various stages of project life cycle.

This SEF 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 interproject beneficiaries, project affected people, women, vulnerable and poor members of the community and other stakeholders to understand their interests and influence over the project.

The SEF mandates preparations of SEPs to provide for dissemination of a variety of information, the mechanism for sharing to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders and the rationale for selecting an appropriate process, culturally appropriate mechanism, and the purpose for engaging with a stakeholder group.

1. INTRODUCTION

This document is a Stakeholder Engagement Framework (SEF) describing the planned stakeholder consultation and engagement process to be implemented for the Seismic Resilience and Energy Efficiency in Public Buildings (“SREEPB” or the “Project”) Project. The SEF is formed in accordance with the World Bank’s ESS10 Stakeholder Engagement and Information Disclosure and is an integral part of the Environmental and Social Management Framework (ESMF) of the Project.

The SREEPB Project has been initiated by the Directorate General of Construction Works (GDCW) of the Ministry of Environment and Urbanization (MoEU), in order to enhance the seismic safety and resilience, and to improve the energy efficiency performance of central government buildings in Turkey. The GDCW will have the overall responsibility of the Project implementation and serve as the main implementing agency (IA). Project Implementation Unit (PIU) of the SREEPB Project is formed by civil servants of GDCW including external environmental, social, and OHS experts will be located in the premises of the Ministry of Environmental and Urbanization (MoEU). The PIU will be responsible for project implementation and coordination, monitoring activities and reporting.

Accordingly, during execution of works and activities to meet the project objectives, GDCW will also be responsible to ensure continuous involvement and participation of the project stakeholders throughout the project life.

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

The key objectives of the SEF are to (i) to establish a systematic approach for stakeholder engagement, (ii) to assess the level of stakeholder interest, influence and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance, (iii) to ensure that technically and culturally appropriate project information on environmental and social risks and impacts are disclosed in a timely, understandable, accessible format; (iv) to identify disadvantaged and vulnerable individuals/groups and establish tailored communication, outreach and engagement activities to include them, (v) to provide PAPs with accessible and inclusive means to raise their concerns/suggestions/grievances and allow implementing agencies to respond to and manage such concerns/suggestions/grievances. The SEF presents the plan and strategy of the PIU plans to communicate with stakeholders who may be affected by or will be interested in the SREEPB Project throughout the project life cycle. It also describes a grievance mechanism (GM), which will enable the stakeholders to raise their grievances/concerns and allow the PIU to receive, assess, respond and resolve these grievance/concerns. The SEF is a living document and it can be revised upon the feedbacks received from the stakeholders and in case any revision made in project design

A draft of the SEF will be disclosed as early as possible, and before project appraisal, and the Borrower will seek the views of stakeholders on the SEF, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP.

2. PROJECT DESCRIPTION

2.1. Project Objective

The project has a national scope and will be available to all central government buildings and central-government affiliated buildings (i.e., public buildings under central line ministries, such as education facilities, dormitories and social facilities, health facilities, cultural centers, and administrative buildings) in Turkey. The identification and prioritization of buildings for inclusion in the Project would be based on national database (KAYES) database, which covers more than 100,000 public buildings and aims to categorize and prioritize public buildings based on their seismic risk.

In short, the Project shall support the priorities driving the “Seismic Resilience and Energy Efficiency” are linked to the national security and development goals, and include the following:

- enhancing the public safety in the seismic areas,
- enabling reliable energy supply,
- improving the energy efficiency in public buildings,
- fostering sustainable economic development, and
- supporting the competitiveness of the economy.

Progress made under the proposed sub-project will be monitored according to the following intermediate indicators: (a) projected lifetime seismic resilience and energy savings from EE investments in public buildings; (b) establishment and operationalization of an EE Fund; associated CO2 emissions reductions as a result of the energy savings; (c) number of building systems renovated, (d) budgetary savings from investments, (e) number of beneficiaries (disaggregated by gender), (f) percentage of project beneficiaries reporting an improvement in building comfort level (disaggregated by gender), (g) number of participants in capacity building activities (with gender breakdown), (h) percentage of municipalities using citizen engagement mechanisms and (i) number of participants (contractors, municipality staff, supervision staff) in gender equality training.

2.2. Project Components

The Project will include four components: (i) investments in central government buildings for structural strengthening and improvement of EE; (ii) advanced technical assistance and capacity building; (iii) project management and implementation support; and (iv) Contingent Emergency Response Component (CERC).

A short description of each component is provided below.

Component 1: Seismic strengthening and energy efficiency improvement in central government buildings.

Under this component, MoEU would support the renovation or, in cases where it is deemed economically unviable to renovate a building, the demolition and reconstruction of central government and central-government affiliated buildings (i.e., public buildings under central line ministries, such as education facilities, dormitories and social facilities, health facilities, cultural centers, and administrative buildings). It is expected that these subprojects will generate demonstrable energy cost savings and life safety benefits and will provide a basis for a scaled up national program aimed at structural and disaster resilience and EE in Turkish public buildings.

Component 2: Advanced technical assistance and capacity building

While this Project supports a relatively modest intervention in approximately 50 public buildings, it is expected to generate significant learning and support to enable the Government to scale up investment in seismic resilience and energy efficiency in thousands of other central government buildings. This Component supports the development of a long term and a significantly scaled up investment program focused on increasing the energy efficiency, structural strengthening and resilience of public buildings in Turkey. Activities undertaken and lessons learnt under this Component also have broader applicability to private and residential structures in Turkey.

To develop and implement a long-term investment plan, there are key measures that need to be undertaken, including: i) development of a robust evidence base, ii) ensuring that regulations are well aligned with objectives and needs, iii) increasing the skills and experience of key professional groups, and iv) through time reduction in the cost and disruption of civil works as well as increased efficiency. The following activities will be funded by IBRD and GFDRR resources.

The development of a prioritized investment plan, and the key elements for its successful implementation (including identification of funding sources), will help ensure activities initiated under the Project are sustained and scaled up once the IBRD loan is fully disbursed. Critical inputs to the investment plan, to be developed by GDCW

Component 3: Project management and implementation support

This Component will finance project management and implementation support activities, including, inter alia, engineering, architectural, Occupational Health and Safety (OHS), individual consultants and other necessary technical expertise; sub-project supervision; monitoring, evaluation and reporting of the Project; communication with Project beneficiaries; training of PIU staff, etc. It would also finance requirements related to the Bank's fiduciary policies and guidelines, Project audits, gender and citizen engagement, social surveys as well as the implementation of environmental and social framework.

For the purposes of this Project, "Operating Costs" entail necessary and reasonable incremental expenses directly incurred by the PIU in Project implementation, including office supplies, office rental, publication of procurement notices, vehicle rental, office and equipment maintenance and repair, communication, translation and interpretation services, travel and supervision costs (including, as appropriate, hotel accommodation, travel services, and per diem), subscription to publications and databases, publication fees, ownership of intellectual property rights, and other miscellaneous expenses, all within a budget and work plan satisfactory to the World Bank.

Component 4: Contingent Emergency Response Component

This component would support emergency recovery and reconstruction efforts under an agreed action plan of activities designed as a mechanism to implement the government's response to an emergency. This provisional component would allow rapid reallocation of uncommitted IBRD financing under streamlined procurement and disbursement procedures, to cover emergency response costs (such as contracting emergency works, procurement of goods and services) following an adverse natural event. The contingent emergency component would be triggered by an official government declaration of an emergency, in accordance with the country's laws and policies. The types of eligible investments would be included in the CERC Manual (to be developed prior to Project Effectiveness) and included in the ESMF.

2.3. Project Location

Most project sites are expected to be on government-owned land in urban, peri-urban locations nationwide. At this stage, it is anticipated that between 50 and 250 buildings could be retrofitted/reconstructed. The sub-projects will be selected from the provinces (e.g., Istanbul, Izmir, Tekirdag, Kocaeli, Kahramanmaras, Tunceli, Ardahan, Hatay, Usak, Burdur, Manisa, Mugla, Bingol) in where seismic gap is present. However, the exact locations of the sub-projects will not be known before project appraisal. Potential provinces in where sub-projects will be selected are presented in Figure 1.



Figure 1. Selected Sub-Project Provinces

3. REGULATIONS AND REQUIREMENTS

3.1. National Legislation for stakeholder engagement

Constitution of Republic of Turkey

In the regulations of the Republic of Turkey stakeholder engagement is secured and guaranteed under the Constitution. The Constitution contains provisions ensuring that people can express their opinions freely. According to “Freedom of thought and opinion (Article 25 of the Turkish Constitution)”, everyone has the freedom of thought and opinion. No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions. “Freedom of expression and dissemination of thought (Article 26 of the Turkish Constitution)” emphasises that; everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities. Everyone also has “Right to petition (Article 74 of the Turkish Constitution)”. According to this, citizens, and foreigner’s resident in Turkey, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Turkey with regard to the requests and complaints concerning themselves or the public.

The Presidency's Communication Center (CİMER) is an official state tool to be used for receiving requests, complaints, and applications for information from the public. The communication channels of CİMER are as follows:

Webpage	https://www.cimer.gov.tr https://giris.turkiye.gov.tr/
Hotline	Alo 150
Mail 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 object of this law is to regulate the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. According to the obligation to provide information (Article 5), the institutions and agencies are required to take necessary administrative and technical measures to provide every kind of information and document, with the exceptions set out in this law, to provide the information for applicants; and to review and decide on the applications for access to information promptly, effectively, and correctly¹.

The Law on Use of the Right to Petition

Citizens of the Turkish Republic are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, in respect to their requests and complaints, in accordance with the Article

¹ <https://www.judiciaryofturkey.gov.tr/English-version-of-Law-on-the-Right-to-information-is-available-on-our-website->

3 of the Law on Use of the Right to Petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Turkey are entitled to enjoy this right.

Regulation on Environmental Impact Assessment²

Regulation on Environmental Impact Assessment (Official Gazette dated 25.11.2014 and numbered 29186), prepared in the context of Article 10 of the Environmental Law (Official Gazette dated 11.08.1983 and numbered 18132), requires conducting a public participation meeting which aims to inform and consult the public on the project. The regulation requires the meeting to be conducted close to the project site, accessible for the interested people; and the date and venue of the meeting need to be approved previously by the Governor and announced in a local and a national newspaper, at least 10 days prior to the meeting. Similar announcements will also be posted to the neighboring quarters and counties, by the staff of the Governor. The comments and concerns raised during the meeting will be recorded by the representatives of the Ministry of Environment and Urbanization and will be considered and assessed throughout the project life.

3.2. International Legislation for Stakeholder Engagement

Human Rights

The Universal Declaration of Human Rights is a declaration where fundamental rights and freedoms of women, man and children are identified, and guaranteed. The Declaration also offers general definitions of economic, social and cultural rights, in addition to the civil and political rights. The first Article of the Declaration follows “All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood” and all Articles mention about the fundamental, cultural, economic, political and social rights of people all over the world. The Declaration, along with the International Covenant of Economic, Social and Cultural Rights, International Covenant on Civil and Political Rights and Optional Protocols constitute the International Human Rights Law.

World Bank Requirements

The World Bank’s Environmental and Social Framework’s (ESF) Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice”. Specifically, the requirements set out by ESS10 are the following:

- “Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

² Official Gazette dated 25.11.2014 and numbered 29186

In line with the above-mentioned principles and the guidelines provided within the SEF, sub-project specific Stakeholder Engagement Plans (SEPs) are required to be prepared. The SEPs will be developed proportionate to the nature and scale of the project and its potential risks and impacts.

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

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder identification and analysis is the initial step for preparation of sub-project specific Stakeholder Engagement Plans and its main objective is to identify each stakeholder group, and the nature of their interest and influence on the project.

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

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 following groups:

- *Direct Stakeholders refers 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 refers 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 through considering following three criteria;

- the extent of 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 level of interest and influence, and as the extent of 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.

The Table 1 below summarizes the potential interests and influence for each of the above-mentioned affected parties.

Table 1. Identified Stakeholder Groups for the SREEPB Project

Stakeholder Group		Level of Interest	Level of Influence
Direct Stakeholders	<ul style="list-style-type: none"> ▪ Workers of the buildings (teachers, healthcare professionals and contracted workers at the buildings, etc.) ▪ Users of the buildings (students, patients, visitors, and their families, etc.) ▪ Communities which could potentially be affected by the construction/renovation activities at the buildings ▪ Directly involved public administrations at National, Provincial and District Level (MoEU, MoNE, MoH) 	High	High
Indirect Stakeholders	<ul style="list-style-type: none"> ▪ Landowners and land users adjacent to the buildings ▪ Residents of municipalities, neighbourhoods 	Medium	High
Other Interested Parties	<ul style="list-style-type: none"> ▪ Local governors and municipalities 	High	High
	<ul style="list-style-type: none"> ▪ NGOs – Associations at local and national level ▪ Media ▪ General public 	Low	Medium
Disadvantaged / Vulnerable individuals or groups	<ul style="list-style-type: none"> ▪ Disabled people ▪ Elderly ▪ Pregnant women and/or women with young kids 	Medium	High

5. Stakeholder Engagement Program

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where professionally designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks and impacts. 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 SREEPB Project recognizes the rights of the local communities and as key stakeholders in the project. A key component of what constitutes a stakeholder engagement plan is the right to free, prior and informed consent (FPIC). Stakeholder engagement therefore 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.

For the SREEPB Project, the stakeholder engagement activities will start as early as possible and will continue throughout the lifecycle of the Project (preparation, construction, and operation).

The nature and frequency of stakeholder engagement activities and consultations will differentiate depending on the scale and scope of the activities to be executed under the sub-projects.

The stakeholders will be informed via consultation meetings, information boards, official websites of the government institutions and/or social media about the (i) objective, scope and available technical details of the Project and the sub-projects, (ii) grievance mechanism and contact details of relevant focal points, (iii) availability of the publicly available project/sub-project information on the official website of GDCW.

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement; (i) openness and life-cycle approach, (ii) informed participation and feedback, (iii) inclusiveness and sensitivity. The Project will realize these principles through the actions listed below;

- keep the community and key stakeholders informed in advance of project progress throughout the life of the project,
- encourage community participation,
- listen to feedback, investigate suggestions, and adopt them where possible,
- ensure transparency,
- ensure equal access to information,
- adapt appropriate communication including gender sensitive and non-discriminatory language,
- ensure inclusion of vulnerable groups, in particular women, youth, elderly to the stakeholder engagement program,
- apply user-friendly engagement tools, and
- use multiple channels for communication.

The SREEPB Project recognizes that being open, listening to the community, and ensuring that the community understands proposed project activities and and the project timeline is the best approach to build effective relationships with the community to assist minimize project impacts.

5.1. Overview of Stakeholder Engagement Methods

In order to sustain ownership of the project stakeholders' during project implementation, and to increase social impact of the project, some stakeholder engagement methods to be used in the implementation phase are explained below.

Due to the government's recommendation and guidance on social distancing and self-isolation regarding the current Covid-19 pandemic circumstances and guidance of the government, it will not be advisable and possible to carry out face-to-face meetings on a large scale. If this situation will not improve during the time of execution of stakeholder meetings, MoEU will prepare presentations about the project and share them with the stakeholders through online meetings. During the online meetings, the participants will be able to share their opinions/concerns and raise their questions. Following the meetings, the presentations and any other materials used during the meeting will be disclosed on MoEU's official website.

After the Covid-19 situation improves in Turkey and government eases social distancing guidelines, MoEU will start to organize face-to-face meetings with the stakeholders.

- **Official Meetings.** The official meetings will include the internal meetings to be held within the MoEU and the meetings to be held with different government authorities and relevant NGOs, institutions to be engaged during preparation and implementation phase of the Project. Most of these meetings will be executed through digital platforms in compliance with Covid-19 prevention measures recommended by the government.
- **Opening and Closing Meetings.** Both at the beginning and end of the project lifecycle, multi-stakeholder meetings will be organized in order to announce and disseminate project activities and outcomes. These meetings will be executed in digital platforms if health risk due to the Covid-19 pandemic still continues in the time of the meetings.
- **Disclosure Meetings.** Disclosure meetings will be held with stakeholders to disclose the ESF documents (SEF, ESMF, LMP, ESCP and other relevant implementation documents) developed for the Project. Most of these meetings will be executed in digital platforms in compliance with Covid-19 prevention measures recommended by the government. The announcements for these meetings will be made via e-mails, official websites of respective government authorities, social media and newspapers. Feedback regarding the disclosed documents will be collected through official correspondences, online feedback forms, e-mails to support the effectiveness of the digital meetings. The ESF documents to be prepared specific for the Project or the sub-projects are living documents which can be updated in accordance with any change on the project and its sub-projects.
- **Consultation Meetings** will be organized to inform the project stakeholders about the scope and timeline of the sub-project activities. These meetings will be organized in coordination with the Provincial Directorates of Environment and Urbanization and PIU. The consultation meetings should include representatives of the building management, NGOs/foundations for disabled people, relevant provincial representatives of the ministries, or any other relevant stakeholders identified during the life of the Project. In addition, sub-project/building level stakeholder engagement activities will to be executed by the Contractors in collaboration with the Supervision Consultants to inform the building users, local population (including the vulnerable people), local administrative representatives (e.g. muhtars), etc. The minutes and participation lists of the meetings will be kept.
- **Digital Communication Tools.** The website (including an additional webpage specific for the Project in addition to official webpage of the MoEU), social media accounts of the MoEU, national/local television channels and radio stations will be used to inform stakeholders about the important developments of the Project. The press releases will also be shared with the press. These tools will be effectively used in compliance with the Covid-19 prevention measures in order to lessen the need of face to face meetings.
- **Grievance Mechanism.** Per the World Bank's ESS10 requirement, a proper grievance mechanism (GM) will be established and operated for the Project. This is explained in detail in Section 7 of this document. For this mechanism to function in a proper and timely manner, a GM focal point who will oversee the entire process will be assigned as a part of the project team of the MoEU. S/he 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 grievance mechanism to ensure its smooth functioning within the scope of the project.

All information regarding SREEPB Project shall be available on the MoEU's and WB's website and also MoEU's social media accounts that will serve as a media tool/channel for communications with the residents. The Project will also develop brochures, leaflets and/or posters for informing the stakeholders about the project activities.

Per the World Bank's ESS10 requirement, a proper grievance mechanism (GM) will be established and operated for the Project. This is explained in detail in Section 7 of this document. For this mechanism to function in a proper and timely manner, a GM focal point who will oversee the entire process will be assigned as a part of the project team of the MoEU. S/he 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 grievance mechanism to ensure its smooth functioning within the scope of the project. The GM will be available to all project stakeholders and will provide channels for project stakeholders to provide feedback and/or express their concerns and grievances related to project activities. The PIU will be responsible for disclosure, delivery and announcement of project/sub-project documents, communication materials and the GM.

Table 2. Stakeholder Engagement Program

Project Phase	Topic of Consultation/Message	List of information to be disclosed	Method Used	Target Stakeholders	Frequency	Responsible Party
Preparation	<ul style="list-style-type: none"> ▪ Need of the project planned activities. ▪ E&S principles ▪ Environment and social risks and impact Management (ESMF) ▪ GMs 	<ul style="list-style-type: none"> ▪ Project concept, E&S principles and obligations, documents, ▪ Consultation process/SEP ▪ Project documents (ESMF, ESCP, GM procedure) <p><i>Update on project development</i></p>	<ul style="list-style-type: none"> ▪ Public notices ▪ Non-technical project summary/presentations ▪ Electronic publications ▪ Social media ▪ Press releases ▪ Consultation meetings (virtual/actual) ▪ Digital communication tools ▪ Grievance Mechanism 	<ul style="list-style-type: none"> ▪ Direct Stakeholders ▪ Indirect Stakeholders ▪ Other Interested Parties ▪ Disadvantaged / Vulnerable individuals or groups 	<p>Prior to beginning of sub-project construction activities</p> <p>Project lifecycle</p>	<p>PIU</p> <p>Supervision Consultants</p>
Construction	<ul style="list-style-type: none"> ▪ Project scope and ongoing activities ▪ ESMF, ESMP and other instruments ▪ SEP ▪ GMs 	<ul style="list-style-type: none"> ▪ Project documents SEP, relevant E&S documents ▪ GM procedure <p><i>Regular updates on Project development</i></p>	<ul style="list-style-type: none"> ▪ Public notices ▪ Non-technical project summary/presentations ▪ Electronic publications ▪ Press releases ▪ Social media ▪ Opening/Consultation meetings ▪ Separate focus group meetings with vulnerable groups ▪ Grievance Mechanism 	<ul style="list-style-type: none"> ▪ Direct Stakeholders ▪ Indirect Stakeholders ▪ Other Interested Parties ▪ Disadvantaged/vulnerable individuals or groups 	<p>Prior to start of construction</p> <p>and</p> <p>as needed during the project lifecycle</p>	<p>PIU</p> <p>Supervision Consultants</p> <p>Construction Contractors</p>
Operation	<ul style="list-style-type: none"> ▪ Grievance mechanisms (GM) 	<ul style="list-style-type: none"> ▪ Project outputs ▪ Redress of grievances 	<ul style="list-style-type: none"> ▪ Closing Meetings ▪ Digital Communication Tools/Social Media ▪ Grievance Mechanism 	<ul style="list-style-type: none"> ▪ Direct Stakeholders ▪ Indirect Stakeholders ▪ Other Interested Parties ▪ Disadvantaged / Vulnerable individuals or groups 	<p>After completion of sub-project activities <i>during the one-year warrant period</i></p>	<p>PIU</p> <p>Supervision Consultants</p>

Proposed strategy to incorporate the view of vulnerable groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. It is similarly important to ensure that project-related awareness raising, and stakeholder engagement be adapted to take into account particular constraints, concerns and cultural sensitivities of such groups and individuals and to ensure their full understanding of project activities and benefits. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Disadvantaged or vulnerable individuals and groups in the context of this Project will be youth, women, elderly population and disabled people, who experience a higher than average unemployment or are in informal employment characterized by less pay, generally have less means and opportunity to express their concerns, or access information to understand their rights or the impacts of the project and have lower familiarity with online tools, services, and communication channels. The described group carries certain disadvantages to benefit from public services and are potential direct affected people from sub-projects.

Table 3 summarizes the initial vulnerable individual/group identification carried out for the Project and also summarizes proposed stakeholder engagement methods for each vulnerable individual/group.

Table 3. Identified Vulnerable Groups and Proposed Stakeholder Engagement Method

Project component	Vulnerable Groups and Individuals	Characteristics/ Needs	Preferred means of notification/consultation	Additional Resources Required
Component 1	People with physical disabilities (mobility, hearing, vision impairment, etc.)	Accessibility, lack of information and funding for training in special needs	Special training needs such as audio devices, accessible venues, etc.	Special training facilitators, sign language translators/ interpreters
Component 1	Women	Accessibility, lack of information	Communication in accessible venues, methods	N/A
Component 1	Elderly people	Accessibility, lack of information and lower familiarity with online tools, services, and communication channels	Communication in accessible venues, methods	N/A
Component 1	Refugees	Accessibility, lack of information and lower familiarity with online tools, services, and communication channels	Support of alternative language	Translator

In order to incorporate the view of vulnerable groups,

- engagements with local organizations and NGOs representing the interests of persons with disabilities will be carried out,

- separate consultations in places of easy access will be conducted for women, youth, elderly population and disabled people and any other vulnerable groups in the targeted provinces,
- information on the project will be provided face-to-face or any appropriate methods specific for the vulnerable groups specified and to be specified for (e.g. in braille, sign language, etc.)
- consultations will be conducted at the locations which enable the access of vulnerable groups, and
- any written or printed project related material to disseminate information will be prepared in culturally appropriate and easy to understand (non-technical) language before dissemination on sites also known to and accessible by the project's vulnerable groups.

5.2. Summary of Project Stakeholder Needs

List of stakeholders during the project implementation will be continuously updated and they will be incorporated in the SEP document. MoEU will discuss different issues with each group of stakeholders depending on their role, responsibility and their level of interest and influence. The below Table 4 **Hata! Başvuru kaynağı bulunamadı.** presents the main issues that will be discussed with each stakeholder group.

A variety of communication methods will be used as appropriate for each set of stakeholders. In general, these include a) Public and individual meetings, b) Announcements in media, c) Provision of general information on noticeboards at public locations, d) Regular mail and email correspondence and Publication of relevant project information on the website of the GDCA.

Table 4. Stakeholder Engagement Techniques for Each Stakeholder Group

Stakeholder	Engagement Technique	Project phase
<p>Students, patients, visitors, and their families</p> <p>Teachers, healthcare professionals and other workers at the buildings</p> <p>Residents of municipalities, neighbourhoods and communities which could potentially be affected by the construction/renovation</p>	<ul style="list-style-type: none"> ▪ Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board in the branch offices of the Municipalities or sub-project buildings at least two weeks prior to the start of any construction works ▪ Communication/visibility materials (social media, posters, brochures, leaflets, hand-outs, local/national TV commercials, local/national newspaper advertisements) 	<ul style="list-style-type: none"> ▪ Before starting with implementation of the sub-project activities

Stakeholder	Engagement Technique	Project phase
<p>activities at the buildings</p> <p>Landowners and land users adjacent to the buildings</p>	<ul style="list-style-type: none"> ▪ Stakeholder engagement/consultation meetings ▪ Individual meetings (if required) ▪ Announcements via media (radio, television) and/or social media ▪ Dissemination of information through the local authorities, focal point for stakeholder engagement ▪ Notice boards to post project information, notices, announcements ▪ Focus Group Discussions with residents/employees or other groups using the buildings on daily basis ▪ Communication/visibility materials (social media, posters, brochures, leaflets, hand-outs, local/national TV commercials, local/national newspaper advertisements) 	<ul style="list-style-type: none"> ▪ Before starting with implementation of the sub-project activities ▪ During the construction works
<p>MoEU MoNE MoH</p>	<ul style="list-style-type: none"> ▪ Official correspondences ▪ Meetings (one on one meetings, public hearings, stakeholder engagement meetings, etc.) ▪ Communication/visibility materials (social media, posters, brochures, leaflets, hand-outs, local/national TV commercials, local/national newspaper advertisements) 	<ul style="list-style-type: none"> ▪ Before starting with implementation of the project activities ▪ During the construction works ▪ During the operation of the reconstructed building
<p>Interested Non-Governmental Organisations (NGOs)</p>	<ul style="list-style-type: none"> ▪ Stakeholder consultation/engagement meetings, and individual consultation, meetings as necessary ▪ Direct e-mail communication ▪ Media/press releases ▪ Communication/visibility materials (social media, posters, brochures, leaflets, hand-outs, local/national TV commercials, local/national newspaper advertisements) 	<ul style="list-style-type: none"> ▪ Before starting implementation of the project activities ▪ During the construction works ▪ During the operation of the reconstructed building
<p>Contractors or sub-contractors for construction, monitoring and supervision of works, and their employees</p>	<ul style="list-style-type: none"> ▪ Information through tender procedure and Contracts 	<ul style="list-style-type: none"> ▪ Before starting with implementation of the project activities
	<ul style="list-style-type: none"> ▪ Communication via supervising engineers 	<ul style="list-style-type: none"> ▪ During the construction works

Stakeholder	Engagement Technique	Project phase
	<ul style="list-style-type: none"> ▪ Toolbox talks at construction sites on health and safety topics ▪ Trainings 	

During the whole life of the project, gender, ethnic and cultural diversity of the citizens will be taken into consideration, especially for their engagement on the project and organizing meetings/stakeholder engagement/consultation events.

Prior to any engagement event the following actions will be taken;

- identification of individual stakeholders to be included,
- Identification of methods for disclosure of information (scope, format, language, and timing,
- identification of location and timing for engagement event (avoiding busy work times, which may be seasonal, and days/times when special events may be occurring due to ethnic and cultural issues),
- agreeing mechanisms for ensuring stakeholder attendance at engagement event, and
- identification and implementation of feedback mechanisms to be used.

Review of Feedbacks from Stakeholders

Ongoing feedbacks and comments received from the stakeholders throughout the project implementation will be reviewed and necessary corrective actions, if needed, will be undertaken by the Social Specialist of the PIU with relevant stakeholders to ensure smooth implementation of the project.

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

6. Implementation Arrangements for Stakeholder Engagement

The current PIU in the GDCW will be responsible for overall implementation of the SREEPB Project, including the implementation of this SEF. The department has qualified technical staff who have experience in managing design, construction and retrofitting contracts.

The PIU's Social Expert and Supervision Consultants will be the responsible parties for implementation of the SEF and sub-project specific Stakeholder Engagement Plans (SEPs) during the entire Project cycle, and will be in charge of communicating with the communities.

Sub-project specific SEPs will be prepared for group of buildings³ by the Supervision Consultants in line with the guidelines provided in the SEF. All contractors in charge of carrying out specific sub-project activities will also be required to implement the relevant provisions of SEP. The Grievance Mechanism (GM) requirements will be laid out in the tender documentation and contracts signed with the contractors.

PIU will review first set of SEPs and share them with the Bank for clearance, and after mutually agreed with the Bank the PIU will review and give clearance to the SEPs. Provincial level stakeholder engagement activities will be managed by the Provincial Directorates of Environment and Urbanization and PIU. Sub-project/building level stakeholder engagement activities will to be executed by the contractors in collaboration with the supervision consultants. All contractors in charge of carrying out specific project activities will also be required to implement the relevant provisions of SEP. The GM requirements will be laid out in the tender documentation and contracts signed with the Contractors.

Table 5. Responsibilities of Key Actors/Stakeholders in SEP Implementation

Responsible Party	Responsibilities
PIU	<ul style="list-style-type: none"> • Incorporating all stakeholder engagement activities into the overall environmental and social management systems • Developing an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members • Expediting, monitoring, following up PIU team for proper implementation of processes related to grievance mechanism and stakeholder engagement issues • Coordinating with parties for proper implementation of processes related to grievance mechanism and stakeholder engagement issues • Consultation on specific SEP activities
Social Specialist (PIU)	<ul style="list-style-type: none"> • Planning and implementation of the SEP • Ensuring that the stakeholder engagement is understood by PIU members and other stakeholders • Leading stakeholder engagement activities with identified stakeholders • Organizing/managing Stakeholder Engagement/Consultation Meetings and other events related to public disclosure of information • Supporting other PIU staff that may have interaction with stakeholders • Coordinating interface and reporting to/from World Bank in relation to implementation of SEF/SEPs • Updating the SEPs periodically and upon major Project changes
Environmental Specialist (PIU)	<ul style="list-style-type: none"> • Monitoring the project progress • Ensuring the successful delivery of all defined documentation • Consolidated reporting on overall SEP activities and the project progress • Implementing social and environmental monitoring • Monitoring and reporting to the PIU and management whether the social and environmental issues stated in related documents are implemented throughout Project lifetime
GM Focal Point (PIU)	<ul style="list-style-type: none"> • Acting as the focal point for the GM in the PIU • Recording and following up grievances relevant to the Project • Management and coordination on resolution of grievances within the

³ Grouping of buildings will be completed after final list of buildings are identified and the buildings will be grouped in accordance with their location, type and complexity.

	<p>Project</p> <ul style="list-style-type: none"> • Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding the stakeholder engagement and other Project activities and coming up with actions • Coordinating and monitoring GM focal points at contractor level • Consolidating Project related grievances from all different GM levels • Informing the PIU and the management about the resolution process • Preparing consolidated GM reports of the Project
Building Management	<ul style="list-style-type: none"> • Planning and implementation of SEP activities with the PIU for the respective building • Reporting/informing the PIU about SEP related activities • Regional and provincial level outreach • Executing defined GM in the SEP properly and informing the PIU about the overall implementation status • Supporting the Project implementation through their available mechanisms and networks (distribution of communication materials, disclosing events/announcements via their websites, organization of meetings, reaching out to relevant stakeholders, etc.) • Provide input to the sub-project specific SEPs developed specific for the building they are responsible for its management
Governmental Authorities (both local and national level)	<ul style="list-style-type: none"> • Providing inputs and feedback during the preparation and implementation phases of the SEP • Participation to relevant stakeholder engagement/consultation meetings
Supervision Consultant	<ul style="list-style-type: none"> • Monitoring the contractors' recording and resolution of grievances, and reporting these to PIU in their monthly progress reports • Contacting with PIU GM Focal Point for the follow up of the grievances • Prepare sub-project specific SEPs in consultation and cooperation with respective Building Management

7. Grievance Mechanism

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

The SREEPB Project will be managed by the PIU which has already been established for another World Bank financed Project; Energy Efficiency in Public Buildings Project (EEPBP) that aims to reduce energy use in central government buildings and develop a transition plan to develop and scale-up suitable sustainable financing and institutional mechanisms. The SREEPB Project will use the same communication channels and grievance mechanism with the EEPBP and will ensure transparency and accountability and meet the requirements of ESS-10 of the WB's ESF. The GM will also serve for the project employees including PIU, construction supervisors and contractors as it addressed in Labor Management Procedures (LMP) of the Project. The construction contractors will prepare their Labor Management Plans before the start of civil works, which will also include detailed description of the workers' grievance mechanism.

The MoEU currently has a call center that can be accessed via both phone and website. This call center is used for all site-related issues that are being carried out by the MoEU. The MoEU/GDCW operates a website for SREEPB Project where all relevant information is being disclosed for review. Moreover, through the complaint submissions section and an e-mail address, the PIU is able to collect concerns and grievances from all stakeholders. The principle of confidentiality and the right to make anonymous complaints will be enabled. The details of the communication channels for the EEPBP Project, which will be temporarily used for the SREEPB Project till establishment of Project specific communication channels, are given below:

E-mail	yigmenerji@csb.gov.tr
Project Webpage <i>Energy Efficiency in Public Buildings Project</i>	https://kamuenerji.csb.gov.tr
MoEU Call Center	Alo181
Grievance Submission	https://kabevanket.csb.gov.tr/sikayet.jsp

Within the scope of SREEPB Project, concerns and grievances will be handled at four levels: (a) contractor level; (b) construction supervision level; (c) MoEU Provincial Directorates level; (d) national level (MoEU Project Implementation Unit).

- Contractor Level:** Each contractor appointed for conducting the civil works will be responsible for receiving, recording and if possible, resolving the concerns and grievances raised by any stakeholder (public building management, building users, visitors, host communities, or beneficiaries, project workers etc.) due to the civil works executed within the scope of the SREEPB Project. The PIU will also require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of works. 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 MoEU on weekly basis.
- Construction Supervision Level:** The concerns and grievances that cannot be addressed at contractor level will be dealt 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 ensure that necessary measures are/will be taken to solve the problem and ensure 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 MoEU.
- Provincial Directorates of Environment and Urbanization Level:** Provincial Directorates of Environment and Urbanization will be responsible for taking the necessary measures to address

received concerns and grievances regarding the activities carried out within the scope of the SREEPB Project to the extent possible. The Directorates will also immediately forward all received concerns and grievances to the Administration, whether the issues are addressed or not.

- d) **MoEU Level:** Within the scope of SREEPB Project, MoEU is responsible to collect, record, and resolve all concerns and grievances raised by stakeholders through the above-mentioned levels. MoEU is responsible for resolving the collected concerns and grievances within 30 days and informing the owner of the concerns and grievances about the result.

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.

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

7.1. Grievance Mechanism Communication

Information about the project's GM will be publicized as part of the initial feedback. Information about the GM will also be posted online on the MoEU's website in Turkish. While communication language is expected to be Turkish for most of the stakeholders directly affected by the Project, attention should be given to ensuring coordination between different contractors, sub-contractors and workers means to address any language differences. Contractors will take necessary actions for acquiring grievances in different languages.

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

- Websites of the GDCW and/or relevant government authorities, where the project activities will be implemented, and
- Available printed copies in 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.

7.2. Assessment and Closing Procedure

The Construction Contractor will be responsible for receiving, recording, and resolving concerns and grievances to be received from stakeholders during the renovation of the public buildings. Each contractor appointed for executing the civil works will set a GM for receiving, recording and if possible, resolving the concerns and grievances raised by any stakeholder (public building management, building users, visitors, beneficiaries, etc.) due to the executed civil works.

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

The Contractor will record the concerns and grievances through the Complaint and Suggestion Form and the Grievance Closure Form (see Annex 1: Grievance Form and Annex 2: Grievance Closeout Form). Verbal concerns and grievances will be recorded by the responsible personnel of the Contractor by filling out the Complaint and Suggestion Form. The Contractor is obliged to send the record of the concerns and grievances to the Project Manager on weekly basis.

The Contractor will forward any received concerns and grievances to the PIU without postponement to allow the PIU to further process the concerns and grievances (i.e. verify, acknowledge and respond to the grievance in the timeframes defined below). The Contractor is obliged to hand out the project

grievance - explain the grievance mechanism to the concerned citizen(s)/local population and forward the filled-in Grievance Form to the PIU, but also, to undertake all proposed corrective actions to react on received grievance.

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

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

In line with the above-mentioned details, the assessment and closure procedures for all GM levels during this Project are summarized below.

- All grievances will be reviewed to be classified whether they are genuine and related to Project activities or not. If the issues/disputes raised are not related to the Project, guidance is provided to the Complainant to contact relevant party. Eligible complaints will be processed through to be solved via the GM.
- All grievances received through direct phone calls, e-mails and face to-face meetings/communications are taken under registration and GM focal points in different GM levels will provide written acknowledgement to the complainant within 5 days of receiving the concern/grievance and explain the Project's response process to grievance.
- The PIU and the contractors have fifteen (15) calendar days to investigate and respond the complainants. If the case requires a more complex investigation, updated information is provided to the complainant explaining the actions required to resolve grievance and the likely the timeline, upon consent of the PIU.
- In order to resolve the grievance, any necessary corrective actions shall be applied to satisfy the complainant.
- All parties shall get an agreement on the corrective actions during solution process.
- The PIU will resolve each complaint and concern within thirty (30) calendar days after receipt of the concern and grievance.
- The complainants may apply to the court in case they are not satisfied with the decision/solution.
- The proof documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed.

7.3. Grievance Log

All complaints will be verified by the PIU in the Grievance Log and assigned a number and acknowledged within 30 calendar days. The Registry will have all necessary elements to disaggregate the grievance by gender of the person submitting it as well as by type of grievance. Each grievance will be verified in the registry with the following information: a) description of grievance, b) date of receipt of grievance and when acknowledgement 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.

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

- Type of appeal,
- Category of appeal,
- People responsible for the execution of the appeal,
- Deadline of resolving the appeal,

- Agreed action plan.

The PIU's Social Expert and focal points 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:

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

7.4. Appeal Mechanism

If the complaint is still not resolved, the complainant may escalate/appeal to a higher level of GM within the project at the central level. If s/he is not satisfied with the decision, then s/he can submit his/her complaint to the appropriate court of law.

7.5. Monitoring and Reporting on Grievances

Monitoring and evaluation of the stakeholder process is important to ensure GDCW is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective.

GM focal points at different GM levels other than the PIU will be responsible to report to PIU's GM focal point about grievances quarterly. The PIU's GM focal point will be responsible for,

- Collecting data from the construction sites on the number, substance and status of complaints and uploading them into the single regional database,
- Maintaining the grievance logs on the complaints received at the regional level, and
- Submitting quarterly reports on GM to the PIU Social Specialist.

The PIU's Social Specialist will be responsible for:

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

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

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

Contractor's team would be responsible for:

- Establishes good relationship with all identified stakeholders,
- Organize the stakeholder engagement meeting events for sub – projects,
- Notice the stakeholder's comments on sub-projects and records their appeals,
- Prepare Semi-Annual Reports and submit to the Project Director.

7.6. The Workers' Grievance Mechanism

As mentioned above, the Contractors will develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of works. The workers' grievance mechanism will include; (i) a procedure describing the flow of the GM, (ii) timeframes to respond to grievances and to resolve cases, (iii) a register sheet to record and track the timely resolution of grievances; (iv) a focal point responsible to receive, record, address and track resolution of grievances.

The Supervision Consultant will monitor the contractors' recording and resolution of grievances, and report these to PIU in their monthly progress reports. The process will be monitored by the GM Focal Point in the MoEU.

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

7.7. Handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) issues

Although the risk from project activities and in Turkey's context is low, grievance mechanism shall include handling disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). The GM that will be in place for the project workers will also be used for addressing SEA/SH related issues and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues. Further, the GM will also have in place processes to immediately notify both the MoEU and the World Bank of any SEA/SH complaints, with the consent of the survivor. Thus, the existing GM will also be strengthened with procedures to handle allegations of SEA/SH violations.

7.8. 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 mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

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

ANNEXES

ANNEX 1: GRIEVANCE FORM

Reference No	
Full Name	
Please mark how you wish to be contacted (mail, telephone, e-mail).	
Province/District/ Location	
Date	
Category of the Grievance	
1. On abandonment (public)	
2. On assets/properties impacted by the project	
3. On infrastructure	
4. On decrease or complete loss of sources of income	
5. On environmental issues (ex. pollution)	
6. On employment	
7. On traffic, transportation and other risks	
9-Other (Please specify):	
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?	
What would you like to see happen to resolve the problem?	
<i>Although giving 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 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 <input type="checkbox"/> NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	

COMPENSATION AND FINAL STAGES

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

Notes:

[Name-Surname and Signature]

Date: ___ / ___ / ____

Of the Complainant:

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