



ILBANK

**Türkiye Earthquake, Floods and Wildfires Emergency
Reconstruction Project (P176608)**

Stakeholder Engagement Plan (SEP)

July 2022

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Abbreviations

CEO	Community Engagement Officer
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GM	Grievance Mechanism
GRS	Grievance Redress Service
ILBANK	İller Bankası A.Ş.
IZSU	İzmir Water and Sewerage Administration
IMM	Izmir Metropolitan Municipality
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-governmental Organization
PAP	Project Affected People
PDO	Project Development Objective
PIU	Project Implementation Unit
PMU	Project Management Unit
RF	Resettlement Framework
RP	Resettlement Plan
SEP	Stakeholder Engagement Plan
TEFWER	Türkiye: Earthquake, Floods and Wildfires Emergency Reconstruction
WB	World Bank

GLOSSARY

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

Implementing Agency: Refers to the İller Bankası A.S (ILBANK), which will assume overall responsibility for the project.

Project: Türkiye Earthquake, Floods and Wildfires Emergency Reconstruction Project.

PIUs: Refers to the staff of PIUs to be established for each of the municipalities benefiting under the Project.

PMU: Refers to the staff of the Project Management Unit (PMU), established under the International Relations Department of ILBANK.

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

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

Stakeholder Engagement Plan (SEP): A SEP is a tool for managing communications with the project stakeholders at the sub-project or activity level. The SEP will describe the timing and methods of engagement with stakeholders throughout the life cycle of the project as agreed between Bank and Borrower, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them. When a project consists of a program and/or series of sub-projects and the stakeholders/stakeholder engagement program cannot be identified in detail until the program/sub-project details have been identified, the SEP may be prepared initially as a framework instrument.

Project Level SEP: The SEP prepared by ILBANK PMU which guides ILBANK's own efforts at stakeholder engagement as well as providing a framework to guide the preparation of individual sub-project specific SEPs by the PIUs.

Sub-Project Specific SEPs: SEPs will be prepared by each PIUs for each sub-projects that reference the Project Level SEP.

EXECUTIVE SUMMARY

The most recent major earthquake (magnitude 6.9) in Türkiye occurred on October 30, 2020 in the Aegean Sea and severely impacted the region of Izmir, which is the third largest urban area and economic hub in Türkiye. Then, Türkiye has been hit by a series of natural disasters in 2021. In August 2021, some wildfires raged through mainly Türkiye's southern coast. In August 2021, more than 300 forest fires broke out in 53 provinces across Türkiye which negatively affected forests and residential areas. Shortly after the fires, a series of violent summer storms, accompanied by heavy rains, lightning, severe floods and landslides hit Türkiye's Black Sea region in September 2021. With hundreds of houses flooded, thousands of residents were forced to leave their homes and find temporary accommodation in schools and other public buildings.

The Project will provide financing for ILBANK to support municipalities in undertaking urgent repairs, structural strengthening and, if needed, demolition/reconstruction of damaged municipal infrastructure. The project will also put in place measures aimed at disaster preparedness and climate adaptation. The Project includes four components: (a) Green and Resilient Rehabilitation, Reconstruction and Construction of Municipal Infrastructure and Actions to Strengthen Municipal Resilience; (b) Technical Assistance to Support Green, Resilient and Inclusive Cities; (c) Project Management and Operations; and (d) Contingent Emergency Response Component (CERC). . The Project Development Objective (PDO) is to support green and resilient disaster reconstruction in municipalities affected by earthquake, floods or wildfires, to strengthen municipal capacity for disaster resilience, and to respond promptly and effectively in the event of an Eligible Crisis or Emergency. .

The SEP has been prepared in accordance with the World Bank's ESS10 Stakeholder Engagement and Information Sharing and is an integral part of the Project's Environmental and Social Management Framework (ESMF). This SEP provides a framework to support the establishment of a continuous engagement process between municipalities and those who potentially would be impacted or have any kind of interest in the Project (stakeholders). Besides, it will also help to manage stakeholder expectations and support the management of risks, and therefore reducing potential conflicts and project delays by providing early, frequent and open communication throughout the life of the project. This SEP also will be a framework for SEPs to be prepared for sub-projects.

This Document is a “Project level” SEP prepared by ILBANK, which guides ILBANK’s own efforts at stakeholder engagement as well as providing a framework to guide the preparation of individual sub-project level SEPs by the municipalities/utilities.

This SEP explains the stakeholder engagement process, including the identification and analysis, key principles, method and proposed strategy for vulnerable groups. The potential stakeholder groups have been identified, and their level of interest and level of influence have been analyzed. The engagement activities will be carried out in a culturally appropriate manner and will include best practice approaches to interact with stakeholder groups so that the project may establish effective relationships for stakeholder engagement. All information regarding the Türkiye Earthquake, Floods and Wildfires Emergency Reconstruction Project (TEFWER) Project will be made accessible on ILBANK’s, municipalities’ and the WB's official websites. Within the scope of the project, brochures, leaflets, booklets and/or posters will also be developed to inform stakeholders about the project activities.

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. 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.

Stakeholder engagement is an on-going process that spans throughout the life of the project starting from planning and design, construction, operation until the end of decommissioning. The PMU in ILBANK will be responsible for the overall implementation of the TEFWER Project, including the implementation of the SEP.

ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Project. The GM process and Sample Grievance Forms are added as ANNEX 1 of this SEP.

1. Introduction

This document is a Stakeholder Engagement Plan (SEP) that explains the stakeholder consultation and engagement process planned and to be implemented for the Türkiye Earthquake, Floods and Wildfires Emergency Reconstruction Project (TEFWER) and prepared by ILBANK. This document is a “Project level” SEP which guides ILBANK’s own efforts at stakeholder engagement as well as providing a framework to guide the preparation of individual sub-project specific SEPs by the municipalities/utilities.

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

Another goal of this SEP is to improve and facilitate decision making and create continuous dialogue between ILBANK itself and project-affected people (PAP) and other stakeholders in a timely manner, and to ensure that these groups are provided equal and sufficient opportunity to voice their opinions and concerns that may influence Project decisions. This SEP will also serve as a base for the SEPs that will be prepared for each subproject once the investments are determined.

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

- To establish a systematic approach to stakeholder engagement that will help municipalities identify stakeholders, and to build and maintain a constructive relationship with all identified stakeholders, especially project-affected parties;
- To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with project affected parties throughout the Project life cycle on broader issues of community development and inclusion beyond specific sub-project issues;
- To ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format; and
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow municipalities to respond to and manage such grievances

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

2. About the Project

Transformation due to the climate change phenomenon and its consequences in terms of natural disasters, which increasingly occupy the agenda of the whole world, has become a national priority for Türkiye, a country situated in the Mediterranean Basin. The main natural disasters in Türkiye have been earthquakes, storms, floods, droughts and forest fires. These disasters cause economic, social and environmental losses in addition to losses of human and animal life. They also have negative impacts on municipal infrastructure and limit the quality of life in cities.

The most recent major earthquake (magnitude 6.9) in Türkiye occurred on October 30, 2020 in the Aegean Sea and severely impacted the region of Izmir, which is the third largest urban area and an economic hub in Türkiye. The City of Izmir suffered disproportionately from this event, with 17 multi-story buildings collapsed and 116 fatalities. Thousands of buildings suffered light to moderate structural damage. Moreover, moderate to heavy damage for 36 public buildings and 32 schools was reported. The earthquake was followed by a tsunami which damaged coastal areas and towns of the province. Between December 2020 and February 2021, the city of Izmir was heavily affected by intense rainfall and flash flooding on three occasions. Flash, river, and coastal flooding in December 2020, resulted in two fatalities and damage to houses and workplaces. In February 2021, 150% of the average monthly rainfall fell in 10 hours, triggering flash floods across the city as the storm water systems failed to absorb rainfall run off.

In addition to the events in Izmir, Türkiye was hit by a series of natural disasters in 2021. In August 2021, some wildfires raged through mainly Türkiye's southern coast. Rising temperatures and strong winds subsequently caused numerous forest fires in southern and western Türkiye. In August 2021, more than 300 forest fires broke out in 53 provinces across Türkiye, which negatively affected forests and residential areas.

Many neighborhoods and villages had to be evacuated. The increase in temperatures in summer and spring, the decrease in snow accumulation and the melting of snow waters at the beginning of spring have caused the dry season to be longer and more intense. This situation causes plants to lose water, making the forests more at risk for burning.

Accordingly, the frequency of forest fires has increased in the last forty years, not only in Türkiye but all over the world; the areas they burn have expanded and the fires have started to last longer. Local governments in Türkiye, located in the Mediterranean Basin – which is one of the regions most exposed to the vulnerabilities of climate change – are also more and more affected by this process. Fire and emergency response services have become one of the most important municipal services for Türkiye, which is frequently exposed to earthquake disasters as well as increasing fires and floods due to climate change. In this regard, municipal fire services are critical to manage emergencies (traffic accidents, building fires, etc.) and then mitigate the effects of natural disasters through prompt and professional response.

Shortly after the fires, a series of violent summer storms, accompanied by heavy rains, lightning, severe floods and landslides hit Türkiye's Black Sea region in September 2021. With hundreds of houses flooded, thousands of residents were forced to leave their homes and find temporary accommodation in schools and other public buildings. The floods, triggered by torrential rain, caused some buildings to collapse, smashed bridges, clogged streets with wrecked cars and cut power supplies. Many livestock were killed while fields were ruined in these largely agricultural provinces. Hundreds of buildings were destroyed by mudslides and cave-ins and water mains badly damaged. Heavy rains are very common in Türkiye's Black Sea region, where floods are an annual occurrence.

The Project would provide financing for ILBANK to support municipalities in undertaking urgent repairs, structural strengthening and, if needed, demolition/reconstruction of damaged municipal infrastructure. The project will also put in place measures aimed at disaster preparedness and climate adaptation. All investments will integrate, where feasible, improvements in energy efficiency and opportunities to harness renewable energy, and other design elements aimed at increasing climate change mitigation and adaptation (e.g., increased capacity in storm water pipes, urban greening and reducing urban heat island effects). Particular attention will also be paid to ensuring equitable access of communities with different socio-economic profiles to Project benefits, especially women, elderly, historically disadvantaged groups, the disabled, and refugees.

The Project Development Objective (PDO) is to support green and resilient disaster reconstruction in municipalities affected by earthquake, floods and wildfires, and strengthen municipal government's capacity for disaster resilience. Provision of immediate response to an Eligible Crisis or Emergency, as needed.

3. Project Components

The Project includes four components: (a) Green and Resilient Rehabilitation, Reconstruction and Construction of Municipal Infrastructure and Actions to Strengthen Municipal Resilience; (b) Technical Assistance to Support Green, Resilient and Inclusive Cities; (c) Project Management and Operations; and (d) Contingent Emergency Response Component (CERC).

Component 1. Green and Resilient Rehabilitation, Reconstruction and Construction of Municipal Infrastructure and Actions to Strengthen Municipal Resilience

This component will finance demand-driven municipal investments to support green and resilient restoration and reconstruction of damaged municipal infrastructure and actions aimed at increasing municipal response capacity and resilience for wildfires, floods, earthquakes and other disasters. Based on damage sustained and requests received, the investments under this component will include restoration of water and wastewater services and restored and resilient transport investments. Activities related to expansion of stormwater systems and increased municipal capacity to respond to flood, wildfire and other disasters will build municipal resilience. The component will finance supervision consultancies and civil works. The types of activities are further elaborated below. .

- (a) **Reduced urban flooding through investment in resilient and climate sensitive stormwater systems.** Recent urban floods in Türkiye highlight the challenges of i) short duration, high intensity rainfall events that are increasingly observed due to climate change and can easily overwhelm city stormwater systems; ii) increased impermeable surfaces within cities that significantly increase rainfall run-off; iii) urban development over ephemeral water systems; and iv) climate change which is increasing periods of aridity punctuated by more intense rainfall events that are beyond the historical design specifications of stormwater systems. These challenges in combination contributed significantly to the flood events over the 2021 summer in Türkiye. Activities that may be financed include expansion of stormwater systems (including separation from wastewater systems), restoration and rehabilitation of damaged stormwater systems and pumping stations, and studies to inform new design and urban standards to reduce rainfall run off and increase capacity in stormwater systems. .
- (b) **Increase emergency response capacity within municipalities for flood, wildfire and other disasters.** Municipal firefighting services are critical for managing all types of emergencies, and to reduce the extent and impact of fire and floods through rapid and professional response. In many cases, due to rapid urban growth and climate change impacts, firefighting services currently do not

have access to the modern equipment commensurate with their changed and expanded response areas and functions, including appropriate equipment for swift water rescue, flood response and to fight fires at the wildland-urban interface. This subcomponent will finance the carrying out of civil works and acquisition of vehicles and equipment required to increase response capacity of municipal firefighting services for wildfires, floods, storms and earthquakes, and as such, to ensure that the municipalities are better adapted and prepared to respond climate change-imposed challenges and the expected growing impact of extreme weather and natural hazards. .

- (c) **Restored and improved resilience of water and wastewater services.** The wildfires and floods resulted in damage to critical water services, such as drinking water and wastewater treatment plants and network lines and highlighted the vulnerability of these services to disasters and climate change. As part of restoration efforts, water and wastewater systems will be assessed for disaster and climate risks and planned repairs, reconstruction, upgrading activities, and new construction of water system will integrate improvements to boost sustainability and resilience, ensure adaptation of the water and wastewater infrastructure to the climate change and promote complementary nature-based solutions. New water networks will be used to provide healthy drinking water in case of disaster as well as to support firefighting services and will improve the access to resilient and safe water services. New water networks will also contribute to improve the disaster and emergency response capacity of municipalities. .
- (d) **Resilient transport and evacuation routes.** Activities will include the construction of, and reconstruction of damaged, bridges, underpasses and connection roads to restore and facilitate access during heavy rains and floods as well as ensure resistant structures during/after earthquakes. The technical and hydrological studies, and the designs for repair and strengthening or reconstruction of the bridges will consider more intense water flows, including floods associated with 500-year return periods, to ensure reconstructed bridges and roads are adapted to future climates. New and reconstructed bridges and roads will include dedicated space/laneways for cyclists and pedestrians to travel safely and can act as evacuation routes in the event of disaster. .
- (e) **Municipality Capacity Building Activities.** Under the Project, Project Implementation Units (PIUs) will be established for each of the municipalities benefiting under the Project. This subcomponent will finance relevant project management and implementation support activities including hiring of individual consultants with expertise in engineering, architecture, climate change, disaster risk management (DRM), urban planning, environment, social, communication and outreach, monitoring and evaluation, Occupational Health and Safety (OHS), and other necessary technical areas, as needed. Other costs associated with sub-project supervision, monitoring and evaluation, communication and outreach, training of PIU staff, etc., will also be covered. The subcomponent would also finance requirements related to the Bank’s fiduciary policies and guidelines, as well as the implementation of environmental and social framework. Any costs incurred by ILBANK in the discharge of its Implementing Agency role on behalf of smaller municipalities will also be financed from this component. .

Component 2. Technical Assistance to Support Green, Resilient and Inclusive Cities

This Component will support ILBANK and municipalities to build a green, resilient and inclusive future by ensuring that there is sufficient institutional and technical capacity to design, supervise and implement investment projects that integrate disaster and climate risks, to explore options to reduce carbon emissions, to improve air quality and to support residents during disaster response, recovery and reconstruction. The outcome of this activity will be: i) guidelines and policy recommendations that improve the development of municipal strategic and spatial plans that integrate disaster and climate risks to natural hazards and climate risks, ii) publicity and visibility activities in order to increase awareness with respect to disaster and climate risks, iii) the identification of investment priorities that are integrated

into strategic city plans and iv) increased capacity within Project municipalities to understand and manage disaster and climate risks. The following activities collectively contribute to the achievement of this outcome and will be financed under this component. .

- (a) **Assessment of disaster and climate threats in Project municipalities and development of guidelines and policy recommendations for supporting the integration into city strategic and spatial plans.** The recent disasters affecting the Project municipalities have highlighted the need to better assess disaster and climate threats, under current and future climate scenarios..
- (b) **Preparation of resilience strategies, investment planning and public awareness.** This will include consultancy services for the preparation of resilience strategies for the most prominent risks and investment planning to advance the climate resilience in municipalities, including options for reduced emissions. Support to increased public awareness of disaster and climate risks will also be included. .
- (c) **Increased capacity of engineering, architecture and other relevant municipal professionals.** The Project will have significant engagement with public sector professionals around structural strengthening, reconstruction, and repairs to infrastructure. Identifying capacity development needs and providing training on an on-demand basis to increase capacity overall of beneficiary municipalities. Moreover, this training will be prioritized towards female professionals in these traditionally male-dominated sectors.

Component 3: Project Management and Operations

Under the Project, there will be a Project Management Unit (PMU) established within ILBANK. The component will finance goods, consulting services related to day-to-day project management, monitoring and evaluation, reporting, and project communications. This component will support hiring of individual consultants with expertise in engineering, climate change, DRM, urban planning, transportation, environment, social, financial management, procurement, communication and outreach, monitoring and evaluation, OHS, and other necessary technical areas. It will also finance requirements related to the Bank’s fiduciary policies and guidelines, as well as the implementation of environmental and social framework. .

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 Component would include rapid procurement and disbursement procedures to cover emergency response costs (such as contracting emergency works, procurement of goods and services) following an adverse natural event, health crisis or technological disaster. The contingent emergency component would be triggered by an official declaration of an emergency or disaster, in accordance with Türkiye’s laws and policies. The procedure for declaring the emergency, types of adverse events covered, and the types of eligible investments will be described in a standalone Contingent Emergency Response Component (CERC) Manual and included in the Environmental and Social Management Framework (ESMF). This component would also allow rapid reallocation of uncommitted IBRD financing from other Components (if needed).

Below Table 1. presents the geographic and sectoral scope of the activities to be financed under different components of the Project.

Table 1. Geographic and Sectoral Scope of the Activities to be Financed

Project theme	Provinces*	Eligible sectors
Earthquake resilience		Water Waste water Urban mobility Emergency evacuation corridors Road junctions/intersections
Flood resilience		Water Waste water Storm water Emergency vehicles
Wildfire resilience		Emergency and firefighting vehicles Water network for fire services Firefighting buildings

*The provinces will be added in later version

4. Regulations and Requirements

4.1. National Legislation for Stakeholder Engagement

Right to Information Act (No. 4982)

The purpose of this law is to regulate the procedure and basis of the right to information in accordance with the principles of equality, impartiality and openness, which are the requirements of a democratic and transparent government. According to the obligation to provide information (Article 5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of information and documents, considering the exceptions set out in this law, to provide information to applicants; and to evaluate and decide on applications promptly, effectively and correctly.

Law on the Exercise of the Right to Petition

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

Constitution of the Republic of Türkiye

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

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

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

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

Regulation on Environmental Impact Assessment

The Regulation Environmental Impact Assessment requires (Official Gazette dated 25.11.2014 and numbered 29186) prepared in the context of Article 10 of the Environment Law (Official Gazette dated 11.08.1983 and numbered 18132), requires organizing a public participation meeting aiming to inform and consult the public about the project. By-law, the meeting is held in an accessible manner for the interested people and close to the project site; and the date and location of the meeting need to be approved previously by the Governor and announced in a local and a national newspaper at least 10 days before the meeting. Similar announcements will also be posted in neighboring living areas and administrative areas, by the staff of the Governor. The comments and complaints 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 life of the project.

4.2. World Bank Requirements for Stakeholder Engagement

World Bank Requirements

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

1. "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts"
2. "Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation."
3. "The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders."
4. "The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of

the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98)”.

ILBANK PMU is the “Borrower” and Municipalities/Utilities will be the “Sub-Borrower”. ILBANK will ensure that Municipalities/Utilities will apply the relevant World Bank Requirements for the implementation of sub-project specific SEPs.

Stakeholder Engagement Plans (SEPs) specific to sub-projects should be prepared in line with the above-mentioned principles and guidelines provided within this Project Level SEP. In addition to this SEP guiding ILBANK’s own efforts at stakeholder engagement, it is also a framework to guide the preparation of individual sub-project specific SEPs. The sub-project specific SEPs will be developed proportionate to the nature and scale of the project, as well as its possible risks and impacts.

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

5. Stakeholder Engagement Process

Based on this SEP, municipalities/utilities will need to prepare a separate SEP for each of their sub-projects. In doing so, they will follow the below mentioned process.

5.1. Stakeholder Identification and Analysis

Once the sub-projects’ footprints are determined, the primary step in stakeholder engagement process will be to identify the Project’s stakeholders. In identifying the stakeholders, municipalities will also determine the needs and expectations for engagement, including their priorities and objectives in relation to the Project. After the identification of stakeholders, municipalities will choose the best engagement method and tool to engage with each stakeholder.

There may be individuals and groups who may be disproportionately affected or further disadvantaged by the project(s) compared to all other groups due to their vulnerable status, and that may require specific engagement efforts in consultation and decision-making to ensure their equal representation in the consultation and decision-making process associated with the project. Therefore, it is important that municipalities/utilities investigate the impacts and risks of their sub-projects on different stakeholder groups including vulnerable groups. The engagement method should be tailored to each identified stakeholder groups ensuring their involvement in the project.

This project level SEP and the subproject specific SEPs are living documents, like other ESF instruments, which can be updated and revised according to changing circumstances of the project and sub-projects. Stakeholders identified in the design phase of a project may change during implementation and therefore will need to be updated accordingly. The identification and analysis of the stakeholders should be performed as early as possible in the project life cycle, taking into account the dynamics between stakeholders and the risks and opportunities of their involvement in the Project, and should:

- Categorize stakeholders in accordance with their level of impact and interest in the project/sub-projects;

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

Depending on the magnitude of impact and influence of the sub-project on the stakeholders, and vice versa, the frequency and scope of the engagement methods will proportionally change. Hence, it is important that the sub-project specific SEPs are prepared in line with the available Environmental and Social Management Framework/ Environmental and Social Management Plans (ESMF/ESMPs) and/or Resettlement Framework/Resettlement Plans (RF/RPs) to determine the level of environmental and social impacts and risks on relevant stakeholders. These project documents will provide information on vulnerable groups (if any) such as women, elderly, people with disabilities, refugees, seasonal workers etc. that all need to be considered during the preparation of sub-project specific SEPs. All engagement methods selected should avoid manipulation, interference and intimidation, and will be carried out by providing timely, relevant, understandable and accessible information in a culturally appropriate way for each of the different stakeholder group targeted. Table 2 below summarizes the potential interests and influence for each of the affected parties mentioned above.

Table 2. Stakeholder Groups for TEFWER Project

Component 1		Level of Interest	Level of Influence
Green and Resilient Rehabilitation, Reconstruction and Construction of Municipal Infrastructure and Actions to Strengthen Municipal Resilience			
Stakeholder Group			
Direct Stakeholders	<ul style="list-style-type: none"> • Communities likely to be affected by the construction works in the scope of component • Workers to be employed for the construction activities • Municipalities • Utilities • Local businesses 	High	High
Indirect Stakeholders	<ul style="list-style-type: none"> • Neighborhood residents • Local community organizations 	Medium	Medium
Vulnerable individuals or groups	<ul style="list-style-type: none"> • Disabled individuals • Elderly individuals • Immigrants, refugees and non-native Turkish speakers 	High	High
Other Interested Parties	<ul style="list-style-type: none"> • NGOs • Media • Public institutions 	Medium	Medium
	<ul style="list-style-type: none"> • Workers to be employed for the construction activities • Local administrators 	High	High
Component 2		Level of Interest	Impact Level
Technical Assistance to Support Green, Resilient and Inclusive Cities			
Stakeholder Group			

Direct Stakeholders	<ul style="list-style-type: none"> • Municipalities • Utilities 	High	High
Indirect Stakeholders	<ul style="list-style-type: none"> • ILBANK • Public institutions 	Medium	Medium
Component 3		Level of Interest	Impact Level
Project management and operations			
Stakeholder Groups			
Direct Stakeholders	<ul style="list-style-type: none"> • ILBANK 	High	High
Indirect Stakeholders	<ul style="list-style-type: none"> • Ministry of Environment, Urbanization and Climate Change • Municipalities • Utilities 	Medium	Medium
Component 4		Level of Interest	Impact Level
Contingent Emergency Response Component			
Stakeholder Groups			
Direct Stakeholders	<ul style="list-style-type: none"> • Communities likely to be affected by the construction works in the scope of component • Workers to be employed for the construction activities • Municipalities • Utilities 	High	High
Indirect Stakeholders	<ul style="list-style-type: none"> • Ministry of Environment, Urbanization and Climate Change <ul style="list-style-type: none"> ○ Directorate General of Environmental Impact Assessment, Permit and Inspection ○ Directorate General of Environmental Management ○ Directorate General of Infrastructure and Urban Transformation Services ○ Turkish Environmental Agency ○ Climate Change Presidency ○ Turkish State Meteorological Service • Ministry of Interior • Ministry of Agriculture and Forestry <ul style="list-style-type: none"> ○ Directorate General of Forestry ○ Directorate General of Water Management • Disaster and Emergency Management Presidency (AFAD) • Provincial Directorates of Environment, Urbanization and Climate Change • Provincial Disaster and Emergency Directorates • Provincial Directorates of Civil Defense Search and Rescue • General Directorate of State Hydraulic Works • Union of Municipalities of Türkiye • Neighborhood residents 	Medium	Medium
Disadvantaged / Vulnerable individuals or groups	<ul style="list-style-type: none"> • Disabled individuals • Elderly individuals • Immigrants, refugees and non-native Turkish speakers 	High	High

Other Interested Parties	<ul style="list-style-type: none"> • NGOs • Media • Public institutions 	Medium	Medium
	<ul style="list-style-type: none"> • Workers to be employed for the construction activities • Local administrators 	High	High

5.2. Key Principles of Stakeholder Engagement

The project level SEP and relevant sub-project specific SEPs to be prepared will ensure that the following key principles are applied to all engagement activities:

- The timing and number of engagement activities is designed to maximize stakeholder involvement while avoiding disruption of the ‘daily business’ of local stakeholders in particular as well as avoiding ‘consultation fatigue’
- All engagement activities are in line with project specific SEP schedule and parallel to the commitments made in ESIA/ESMPs and also RPs if any.
- Ensure that all engagement activities are recorded and findings/feedback that require any action to be taken is incorporated to relevant documents, shared with responsible parties and followed up in a timely manner
- Ensure that every engagement activity is culturally appropriate, sufficient and disseminated in a timely manner with equal access to all relevant stakeholders allowing for their increased participation and feedback
- Project specific SEPs are updated as required during the project life cycle.

5.3. 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 3 below. These methods and tools are identified in line with the currently available project information and need to be revised accordingly while preparing the project specific SEPs. The language of communication throughout the Project is expected to be Turkish; however, different languages will be also taken into consideration, if need be, to increase the efficiency of the engagement activities and ensure involvement of all stakeholder groups. The engagement activities will be carried out in a culturally appropriate manner and will include best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

Table 3. Engagement Methods to be Employed under the Project

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

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

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

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

The PMU and PIUs will be responsible for the sharing, delivering and announcing of project/sub-project documents, communication materials and GM.

In the light of information given in the previous paragraphs, the summary of the stakeholder engagement program is given in Table 4.

Table 4. The Overview of the Stakeholder Engagement Program

Project Phase	Consultation Subject/Message to be delivered	List of information to be disclosed	Method Used	Target Stakeholder	Frequency	Responsible Party
Preparation	<ul style="list-style-type: none"> • Inform the stakeholders about the scope and need of the Project. • Consult the stakeholders about <ul style="list-style-type: none"> ○ project design, ○ environmental and social risks and impacts, ○ proposed mitigation measures, • ESMF, GMs 	<ul style="list-style-type: none"> • Project concept, E&S principles and obligations • ESF documents (ESCP ESMF, Sub-Project Specific SEPs, LMP, RF) 	<ul style="list-style-type: none"> • Opening meeting • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools • Grievance Mechanism • Poster, brochure, leaflet, etc. • SMS 	<ul style="list-style-type: none"> • Direct Stakeholders • Indirect Stakeholders • Disadvantaged/Vulnerable individuals or groups • Other interested parties 	Before the commencement of component activities Throughout the project lifecycle	<ul style="list-style-type: none"> • ILBANK • PIUs
Implementation & Construction	<ul style="list-style-type: none"> • Inform the stakeholders about the project scope and ongoing activities • E&S documents (ESMF, ESMPs, RPs, Sub-Project Specific SEPs, etc.) • GMs 	<ul style="list-style-type: none"> • ESMPs/ESIAs • Sub-Project Specific SEPs • LMP • RPs • GM procedure • Regular updates on Project development/implementation 	<ul style="list-style-type: none"> • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools • Grievance Mechanism • Poster, brochure, leaflet, etc. • SMS 	<ul style="list-style-type: none"> • Direct Stakeholders • Indirect Stakeholders • Disadvantaged/Vulnerable individuals or groups • Other interested parties 	Prior to start of implementation of the project, and as needed during the project lifecycle	<ul style="list-style-type: none"> • ILBANK • PIUs • Supervision Consultants • Contractors
Operation	<ul style="list-style-type: none"> • GMs 	<ul style="list-style-type: none"> • Project outputs • Redress of grievances 	<ul style="list-style-type: none"> • Closing Meeting • Consultation meetings • Disclosure meetings, • Digital Communication Tools/social media • Poster, brochure, leaflet, etc. • SMS 	<ul style="list-style-type: none"> • Direct Stakeholders • Indirect Stakeholders • Disadvantaged/Vulnerable individuals or groups • Other interested parties 	After completion of sub-project activities, during the one-year warranty period	<ul style="list-style-type: none"> • ILBANK • PIUs

5.4. Proposed Strategy for Including Views of Vulnerable Groups

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

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

Table 5 summarizes the disadvantaged/vulnerable individual/group identification carried out for the project as well as the suggested stakeholder engagement methods for each disadvantaged/vulnerable individual/groups

Table 5. Summary of Disadvantaged/Vulnerable Individuals/Groups and Suggested Stakeholder Engagement Methods

Project Component	Vulnerable Groups and Individuals	Features/Needs	Preferred method for information sharing and consultation	Additional Resource Support
Component 1 and Component 4	Disabled individuals	Funding for training to assist individuals with lack of accessibility, information and special needs	Audio devices, accessible platforms, etc. special training needs	Special education coordinators, sign language translators/interpreters
	Elderly individuals	Lack of knowledge and inexperience about accessibility, online tools, services and communication channels	Communication methods in accessible areas	Not necessary
	Immigrants, refugees and non-native Turkish speakers	Those who have difficulties in communication	Translated documents, special translators, communication in accessible areas	Translators

To include the views of vulnerable groups:

- Engagements will be carried out with regional organizations and NGOs representing the rights of persons with disabilities;
- Separate consultations will be conducted for elderly individuals and 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.

5.5. Timing of Stakeholder Engagement

Timely organization and execution of stakeholder engagement activities that will be conducted during ESIA/ESMP and RP implementation will be critical in supporting the Project's risk and impact management process. This is especially the case during the early identification and management of potential adverse and positive impacts and risks which will allow for a cost-effective project design.

Stakeholder engagement is an on-going process that spans throughout the life of the project starting from planning and design, construction, operation until the end of decommissioning.

Project specific SEPs prepared by the municipalities will include a stakeholder engagement program that covers the entire life span of the project and presents the timing, frequency of engagement activities, communication tools/method to be used, target stakeholders and responsible parties for each project phase (preparation, implementation/construction, operation).

5.6. Summary of Consultations

Transformation of the climate change phenomenon and its consequences to disasters, which increasingly occupy the agenda of the whole world, has also become a national priority for Türkiye especially in Mediterranean Basin. Considering the assessment of long years in the general sense, it is seen that the most frequently experienced natural disasters in Türkiye are earthquakes, storms, floods, droughts and forest fires. These disasters cause economic, social and environmental losses in addition to life losses and direct economic losses. These disasters also have adverse impacts on the municipal infrastructure and limit the quality of services provided by the municipalities and the quality of life in the cities. In response to these disasters, TEFWER project was designed in collaboration with the World Bank and ILBANK to rehabilitate adverse impacts of the disasters and to build more resilient infrastructure and municipalities in the selected cities.

During the preparation phase of the TEFWER Project, consultation activities were carried out by the Disaster and Emergency Management Presidency (AFAD) with the disaster affected Municipalities/Utilities in order to receive the damage assessment reports of the cities which were affected from the natural disasters in 2020 and 2021. Project design has taken into account the requirements of the municipalities/utilities to increase their response capacity to natural disasters. The municipalities/utilities proposed sub-projects which are relevant to the scope and objective of the TEFWER Project. The consultations have been carried out by ILBANK either by phone or e-mail to receive the proposed sub-projects of the municipalities/utilities especially in the last six (6) months of 2021. In October 2021, ILBANK visited İzmir Metropolitan Municipality (IMM) and İzmir Water and Sewerage Administration (İZSU) to discuss the potential sub-projects of İzmir to be included in the TEFWER Project.

6. Institutional Arrangements for Stakeholder Engagement

The PMU in ILBANK will be responsible for the overall implementation of the TEFWER Project. ILBANK has prepared this Project Level SEP which guides ILBANK's engagement with stakeholders on the broader objectives of the project, as well as providing a framework for municipalities to prepare sub-project specific SEPs.

The management, coordination and implementation of the sub-project specific SEPs and its integral tasks will be the responsibility of dedicated team members within the relevant municipality/utility.

For the implementation of the sub-project specific SEPs, the "sub-borrower" municipalities/utilities will be responsible for:

- Preparing, disclosing, consulting on, and updating the content of the draft sub-project specific SEP (in line with this project level SEP) and sharing it with ILBANK for final approval;
- After receiving ILBANK’s clearance on the draft sub-project specific SEP, disclosing and implementation of final sub-project specific SEP;
- Assigning dedicated staff for the implementation and monitoring of engagement activities;
- Preparing relevant engagement tools and materials for the project specific SEP and ensuring their timely application and/or dissemination;
- Approving and facilitating all stakeholder engagement events and disclosure of materials to support stakeholder engagement events;
- Keeping records of all engagement activities, monitoring and reporting to ILBANK on a regular basis (through providing inputs on engagement activities in the semi-annual progress reports);
- Ensuring that all feedback received from tasks carried out are incorporated in relevant documents and reflected in the decision-making process; and
- Maintaining the stakeholder database.

PIUs will be responsible for the implementation of the Stakeholder Engagement Plans (SEPs) that will be prepared specifically for sub-projects and for communication with the communities throughout the life of the project.

The sub-project specific SEPs will be prepared by municipalities/utilities for the components in line with the principles provided in this Project Level SEP. All contractors responsible for certain sub-project activities will also be expected to apply the relevant provisions of the sub-project specific SEPs. The Grievance Mechanism (GM) requirements will be regulated in tender documentation and contracts signed with contractors.

The PMU will review the SEPs specific to sub-projects and share it with the WB for clearance; and after the SEP is mutually agreed with the WB, the PMU will review and give clearance to the sub-project specific SEPs for disclosure. Stakeholder engagement activities at sub-project level will be managed by the PIU, while the stakeholder engagement activities at sub-project level will be carried out in collaboration with contractors and supervision consultants. All contractors responsible for specific project activities are also required to apply the relevant provisions of the SEP. GM requirements will be set out in the tender documentation and contracts signed with the Contractors.

Under the PMU of the ILBANK Department of International Relations, a GM Team has been established and is composed of the Social Expert of the PMU and the Technical Group Manager. The GM Team is responsible for the implementation of ILBANK GM Policy given in Annex-1 of this SEP.

Table 6. Responsible Parties for SEP Implementation

Responsible Party	Responsibilities
ILBANK PMU	<ul style="list-style-type: none"> • Incorporating all stakeholder engagement activities which will be undertaken by ILBANK into the environmental and social management systems • Developing an internal system to communicate the progress and results of stakeholder engagement to senior management and employees • Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues. • Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues
Social Expert (PMU)	<ul style="list-style-type: none"> • Planning and implementation of the Project Level SEP • Ensuring that stakeholder engagement is understood by PIU members and other stakeholders

	<ul style="list-style-type: none"> • Organizing / managing Stakeholder Engagement/Consultation Meetings and related events on public information sharing at project level • Supporting other PMU staff who may interact with stakeholders • Coordinating interface and reporting to/from the World Bank on the implementation of the SEP/SEPs • Updating the Project Level SEP periodically and in case of major Project changes • Reviewing the sub-project specific SEPs <p>Monitoring and supporting the PIUs regarding communication with stakeholders and stakeholder engagement is at the maximum level</p>
Environmental Specialist (PMU)	<ul style="list-style-type: none"> • Monitoring the progress of the project • Ensuring the successful delivery of all defined documents • Consolidating reports on overall Project Level SEP activities and project progress • Implementing social and environmental monitoring • Monitoring and reporting about the social and environmental issues specified in the relevant documents that are implemented throughout the Project
GM Team, Social Expert (PMU)	<ul style="list-style-type: none"> • Acting as the focal point for the GM in the PMU • Keeping records and follow-up of the complaints related to the project • Managing and coordinating the solution process of project-related complaints • Inspecting grievance records to reveal relevant non-compliance issues or recurring issues with stakeholder engagement and other Project activities • Coordinating and monitoring GM contacts at the contractor level • Collecting project-related grievances from all different GM levels • Informing the PMU and management about the solution process • Preparing compiled GM reports related to the project • Monitoring the grievance records of contractors and the resolution process of the grievances and reporting them to the PMU in monthly progress reports • Maintaining regular contact with the PMU in order to respond to grievances/find solutions
Procurement Specialist	<ul style="list-style-type: none"> • Providing consultancy in tenders to be held within the scope of the Project. • Ensuring that the GM and the other environmental and social instruments are incorporated into the tender documents • Preparing English and Turkish copies of the tender documents
Monitoring and Evaluation Specialist	<ul style="list-style-type: none"> • Coordinating monitoring and evaluation studies • Preparing monitoring reports to be submitted to WB in a timely manner
Technical Specialist	<ul style="list-style-type: none"> • Providing technical support to the project
Governmental Authorities (both local and national level)	<ul style="list-style-type: none"> • Providing inputs and feedback during the preparation and implementation phases of both project level SEP and sub-project specific SEPs • Participating in relevant stakeholder engagement/consultation meetings
GM Focal Point (PIU)	<ul style="list-style-type: none"> • Acting as the focal point for the GM in the PIU • Keeping records and following up on complaints related to the project • Managing and coordinating the solution process of project-related complaints • Inspecting grievance records for relevant non-compliance issues or recurring issues with stakeholder engagement and other Project activities • Coordinating and monitoring GM contacts at the contractor level • Collecting project-related grievances from all different GM levels

	<ul style="list-style-type: none"> • Informing the PIU and management about the solution process • Preparing compiled GM reports related to the project • Monitoring the grievance records of contractors and the resolution process of the grievances and reporting them to the PIU in monthly progress reports • Maintaining contact with the PIU in order to respond to grievances/find solutions
Environmental and Social Specialist of the PIUs	<ul style="list-style-type: none"> • Ensuring that stakeholder engagement is understood by PIU members and other stakeholders • Carrying out the stakeholder engagement activities with identified stakeholders • Organizing/managing Stakeholder Engagement/Consultation Meetings and related events on public information sharing • Supporting other PIU staff who may interact with stakeholders • Supporting the Supervision Consultants and the sub-contractors on the implementation of E&S Documents (ESIAs, ESMPs, SEPs and RPs) • Preparing sub-project specific SEPs in consultation and cooperation with the relevant building management • Supervising the implementation of the Project’s environmental and social instruments • Implementing the sub project specific SEPs • Reviewing monitoring reports • Preparing semi-annual reports on the implementation of the environmental and social instruments • Alerting ILBANK management about accidents and incidents • Monitoring and reporting about the social and environmental issues specified in the relevant project specific E&S documents to be implemented throughout the Project.
Supervision Consultant	<ul style="list-style-type: none"> • Ensuring that the project adheres to the methodology and other requirements which are mentioned in E&S Documents (ESIAs, ESMPs, SEPs and RPs) during implementation of sub-projects • Monitoring the contractors’ recording and resolution of grievances, and reporting these to PIU in their monthly progress reports • Maintaining contact with the PIU GM Focal Point for the follow up of the grievances
Community Engagement Officers (Contractor)	<ul style="list-style-type: none"> • Monitoring the contractors’ recording and resolution of grievances, and reporting these to the PIUs in their monthly progress reports • Maintaining contact with the PIU GM Focal Point for the follow up of the grievances • Organizing and carrying out the Stakeholder Engagement/Consultation Meetings and related events regarding public information sharing

7. Grievance Mechanism

7.1. Project Specific Grievance Mechanism (for ILBANK and the Municipalities)

ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Project. The detailed Grievance Mechanism process and Sample Grievance Forms are given in the ANNEX 1 of this SEP.

Grievance mechanisms will also be established by those municipalities that do not already have GMs in place. All the local GMs will receive, resolve and follow up on issues raised by stakeholder in relation to subproject issues (such as suggestions, complaints, compliments, inquires for information or whistleblower complaints). The GM focal points of the Municipality/Utilities and Community Engagement Officers (CEOs) of the construction contractors will be accessible to all stakeholders and will be responsible to ensure that all requests are handled in a timely and effective manner. The local GMs will be established in line with the Grievance Mechanism described in the ILBANK GM Policy.

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

1. **Dissemination of GM.** Communication and information tools will be prepared to disseminate information about the grievance mechanism. The project stakeholders will be informed regarding the available GM, its intake channels and operational procedures. The communication and informative tools to be developed are listed, but not limited to the followings:
 - a. Web page (ILBANK, PIU, relevant local government authorities)
 - b. E-mail address (ILBANK, PIU, relevant local government authorities)
 - c. Consultation meetings
 - d. Telephone (ILBANK, PIU, relevant local government authorities)
2. **Submission of grievances and requests to ILBANK.** ILBANK includes several uptake channels for its GM. More details are in Annex 1:
 - a. ILBANK website,
 - b. Internal Memorandum (memo),
 - c. E-mail,
 - d. Brochures and leaflets; and
 - e. Face to face meetings.
3. **Submission of grievances and requests at the subproject level.** PIUs at the municipal level will establish GMs, with multiple channels for submitting grievance and requests, as listed below:
 - a. Telephone (Call Center and units);
 - b. Personal visit to Municipalities/Utilities or head office/branches of the construction contractor;
 - c. The suggestion/complaint boxes (installed at ILBANK, Municipalities/Utilities or construction sites);
 - d. Through concerned public administrations (district governorship, municipality, mukhtars);
 - e. E-mail;
 - f. Meetings;
 - g. Through staff and local communication desk of Municipalities/Utilities or CLOs of construction contractor;
 - h. By written petition to Municipalities/Utilities or construction contractor; and
 - i. During site visits
4. All the grievances received through the above channels will be collected at the PIU or Construction Contractor level.

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

The ILBANK PMU and the PIUs will use the same Grievance Register Software for the effective operationalization of the GM. When the PIUs register a complaint into the Grievance Register Software, the PMU will be able to monitor the processing of the complaint through the Grievance Register Software. When the PMU receives a complaint related to a sub-project, it will assign the complaint to the relevant PIU for management and eventual closure after taking necessary corrective actions.

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

7.2. Workers' Grievance Mechanism

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

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

The Ethics committee (EC) is responsible for investigating all sensitive complaints¹ referred by the GM team or by any member of ILBANK PMU staff includes a senior manager, a manager and a staff representative under the Department of International Relations of ILBANK.

The workers grievance mechanism will have same operational flow as defined in *Section 7.1., Project Specific Grievance Mechanism*.

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

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

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

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

Worker Complaints

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

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

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

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

All the grievances and feedbacks will be registered in ILBANK GM Software (for details please see Annex 1) that will be established and ILBANK GM Team will follow-up the process.

7.4. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank’s attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit

<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

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

8. Monitoring and Reporting

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

Each project specific SEP will include a timeline for engagement activities as well as defining responsible parties for the implementation and monitoring of engagement activities. Monitoring of engagement activities can be realized through identifying key performance indicators that reflect the objectives of the SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase are presented in Table 7.

Table 7. Sample Key Performance Indicators by Project Phase

Project Phase	Indicator	Verification Method
Design and Planning	Preparation of sub-project specific SEPs	# of sub-project specific SEPs prepared
	Public consultation meetings carried out to provide Project information and introduce project documents such as ESIA/ESMPs and/or RF/RPs	# of meetings conducted # and type of participants attended
	Designated staff appointed to carry out sub-project specific SEP	Statement of staff appointed
	Establishment of Project GM	Official correspondence
Construction	Awareness raising activities carried out throughout the life of the Project	# of meetings held # of people interacted
	# of grievances received due to construction	Decrease in the # of grievances received due to construction
Operation	# of grievances received due to operation	Decrease in the # of grievances received due to operation

As per the reporting requirements set in the ESMF and RF of the Project, the municipalities will be responsible for reporting to ILBANK semi-annually on project progress. Sub-project specific progress reports will also include a section on stakeholder engagement activities conducted and disaggregated data about the grievances during the specified period. Stakeholder engagement activities can be presented in a tabular format listing the tasks undertaken, the time of action, responsible party, target group and the purpose of the action will be presented. The municipalities will inform ILBANK on any changes made to the SEP (if any).

ANNEX 1. Grievance Mechanism

Grievance Mechanism (GM)

ILBANK Policy and Procedure

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Abbreviations

CIMER	The Presidency’s Communication Center
EC	Ethics Committee
GM	Grievance Mechanism
HR	Human Resources
ILBANK	İller Bankası A.Ş.
IFIs	International Financial Institutions
M&E	Monitoring and Evaluation
PIU	Project Implementation Unit
PMU	Project Management Unit
PSEA	Protection from Sexual Exploitation and Abuse
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
UN	United Nations
YIMER	The Foreigners Communication Center

1. Introduction

The Grievance Mechanism (GM) is a process that allows any stakeholder to file a complaint, raise a concern or provide opportune feedback regarding the planning, implementation or the management of a project.

ILBANK has established a transparent and comprehensive GM in order to receive, evaluate and address grievances pertaining to every international project it finances. The GM allows to receive the wishes, demands, concerns, complaints, questions and problems of all project stakeholders, including project affected people and other interested parties, and to resolve all adverse situations. The GM facilitates a prompt response to grievances by providing timely input to Project Management Unit (PMU) for effective decision making to address the issues raised.

2. Purpose

The GM aims to increase accountability towards the stakeholders of ILBANK. It creates an opportunity to provide feedback on the quality and quantity of the services implemented by ILBANK, as well as ensuring a transparent platform to inform PMU about potential risks and impacts of project activities and corrective actions that relevant divisions or staff of ILBANK need to take. This Policy document describes the principles and procedures of the GM.

3. Scope

This policy is accessible to all ILBANK staff or related Municipality staff who are directly working in the projects and all community members² and stakeholders. The GM is accessible to anyone, any group, institution or organization including ILBANK staff who wishes to provide feedback or raise concerns on ILBANK projects.

4. Reference

The GM Policy is a complement to ILBANK Statute and ILBANK Human Resources Guidelines (Document Number: 28518).

5. Responsible parties

The Deputy General Director of ILBANK Department of International Relations is the overall responsible authority. The Project Management Unit (PMU) of the same Department is responsible for the dissemination and implementation of the policy. The GM Team (Please see 5.1. GM Team section), with Monitoring and Evaluation (M&E) Expert, is responsible for implementation, monitoring and evaluation of the GM.

5.1. GM Team

GM Team is established with expert/technical expert and technical group manager under the PMU of ILBANK Department of International Relations. Roles and responsibilities of expert/technical expert and technical group manager are given below:

Technical Group Manager

² People who receive services from ILBANK projects or affected by the relevant projects.

- To ensure that this procedure is implemented.
- To lead the grievance closure process when multi-dimensional work is needed.

Expert/Technical Expert

- To ensure the complaints management system to register, investigate and resolve complaints received from project affected people or workers.
- To ensure the investigation and resolution of reported complaints in a timely and acceptable manner to this Procedure.
- To ensure continuity of the Complaints Register Software and that the Software is up-to-date.
- To support the Ethics Committee in resolution of sensitive complaints.
- To review, classify and assign the grievances if they are genuine and related to sub-projects or not.
- To implement corrective actions to close out complaints.

5.2. Project Implementation Unit

A Project Implementation Unit (PIU) will be established at the level of municipalities/utilities for a sub-project financed by ILBANK through International Financial Institutions. Each PIUs will have their own Grievance Mechanism (GM) as it is defined in Stakeholder Engagement Plan of sub-projects. A Focal point will be assigned by Municipalities/Utilities to implement GM. Roles and responsibilities of focal point are given below:

Focal Point

- To ensure the complaints management system to register, investigate and resolve complaints received from project affected people or workers.
- To ensure the investigation and resolution of reported complaints in a timely and acceptable manner to Procedure of Municipality/Utility.
- To ensure continuity of the Complaints Register Software and that the Software is up-to-date.
- To review, classify and assign the grievances if they are genuine and related to projects or not.
- To implement corrective actions to close out complaints.
- To inform the ILBANK GM Team regularly

The PIUs of the Municipalities/Utilities are responsible for implementing the GM during the construction activities, where Municipalities/Utilities is responsible for both the construction and operation phases (together with the Operator if contracted by Municipalities/Utilities). The PIUs of the Municipalities/Utilities, together with contractors and supervision consultants, have to ensure that the GM is implemented effectively.

The PMU and PIUs will use same Grievance Register Software for implementation of GM. When a PIU registers a complaint according to the PIU GM procedure into the Grievance Register Software, the PMU will be able to monitor all process of complaint through the Grievance Register Software.

When the PMU receives a complaint related to a sub-project, it will assign the related PIU to manage and close out complaint after taking necessary corrective actions.

ILBANK will train the municipalities/utilities to ensure that they have their own capacity to implement their GMs effectively and are acknowledged about the software to be used.

5.3. Ethics Committee

The Ethics committee (EC) is responsible for investigating all sensitive complaints³ referred by the GM team or by any member of ILBANK PMU staff. The EC includes a senior manager, a manager and a staff representative under the Department of International Relations.

6. Adaptation Procedure

In relevance with the World Bank's Environmental and Social Standards, the draft policy prepared by the PMU approved by the PMU Manager. It comes into force after signature of the Deputy General Director of ILBANK Department of International Relations. It is then accessible to all stakeholders in English, Turkish, and Arabic at ILBANK Department of International Relations' website which will enable access for external users as well as ILBANK staff (*TBD*). A summary of this policy will be communicated to all stakeholders in the most accessible and clear way through appropriate communication methods. These methods will be as follows:

- ILBANK website,
- Internal Memorandum (memo),
- E-mail,
- Brochures and leaflets; and
- Face to face meetings.

All staff will be introduced to the policy via trainings and PMU staff in charge of the implementation of the policy will receive additional training to manage, monitor and sustain this mechanism.

7. Principles of GM

The GM is based on the UN Guiding Principles on business and human rights. The Mechanism's guiding principles are as follows:

- **Legitimate:** A mechanism must have clear, transparent, and sufficiently independent governance structures to ensure that no party to a particular grievance process can interfere with the fair conduct of that process.
- **Accessible:** A mechanism must be publicized to those who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers of access, including language, literacy, awareness, finance, distance, or fear of reprisal.
- **Predictable:** A mechanism must provide a clear and known procedure, with time frames for each stage; clarity on the types of process and outcome it can (and cannot) offer; and means of monitoring the implementation of any outcome.
- **Equitable:** A mechanism must ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms.
- **Rights-based:** A mechanism must ensure that its outcomes and remedies accord with internationally recognized human rights standards.
- **Transparent:** A mechanism must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

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

- **Anonymity:** A mechanism should provide means by which all individuals are able to raise anonymous complaints. This gives the applicants confidence that they will not be retaliated (see below) against for raising concerns.
- **Non-retaliation:** ILBANK recognizes every person’s or stakeholders’ right to provide feedback or to raise a complaint, whether positive or negative. Any attempt of retaliation against a complainant is considered as misconduct and will be investigated.

8. Submission of a Complaint

8.1. Who May Use the GM?

ILBANK staff or related project staff⁴: It is also accessible to ILBANK PMU staff or related staff (e.g. municipality staff) who has the responsibility to report inappropriate staff attitude toward a community member or attitude which violates ILBANK’s Human Resources Guidelines.

Community members or partners: The GM is primarily accessible to all ILBANK projects’ beneficiaries, host communities, or anyone affected by or is likely to influence ILBANK’s projects, and who wish to provide feedback or to raise a complaint and to obtain a response.

A feedback or complaint can be anonymous. In this case, it will follow the same process as non-anonymous complaints, but the complainant will not have a right to be informed about the outcome of the process.

8.2. How to Submit a Complaint?

A complaint can be submitted in any of the ways outlined below:

- Web site : <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- E-mail : bilgiuidb@ilbank.gov.tr
- Phone : +90 312 508 79 79
- Official Letter : ILBANK Department of International Relations, GM Team - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle / Ankara
- Presidency’s Communication Center: The Presidency’s Communication Centre (CIMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.
 - www.cimer.gov.tr
 - Call Centre: 150
 - Phone number: +90 312 525 55 55
 - Fax number: +90 0312 473 64 94
 - Mail addressed to Republic of Türkiye, Directorate of Communications
 - Individual applications at the community relations desks at governorates, ministries and district governorates
- Foreigners Communication Center: The Foreigners Communication Center (YIMER) has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.
 - www.yimer.gov.tr
 - Call Centre: 157
 - Phone number: +90 312 5157 11 22

⁴ **Related Project Staff** refers to the personnel of the Municipality, Utility (Water and Sanitation Administration), Consultant or Contractor Companies who are directly involved in the projects funded by ILBANK.

- Fax number: +90 0312 920 06 09
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the Republic of Türkiye General Directorate of Migration Management

Any grievance and feedback lodged/conveyed through CIMER and/or YIMER related to the Project will be registered in the GM database and managed as per GM Procedures, as relevant, by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

Below mechanisms are available if a **worker/staff** would like to submit a complaint:

- Mailbox : Mailboxes placed (where confidential submission will be suitable) in Department of International Relations of ILBANK and project sites will be available for staff members who wants to submit a complaint,
- E-mail : etikuidb@ilbank.gov.tr
- Official Letter : ILBANK Department of International Relations, GM Team – Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle / Ankara
- Presidency Communication Center (CIMER) : The CIMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.
 - www.cimer.gov.tr
 - Call Centre: 150
 - Phone number: +90 312 525 55 55
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- Foreigners Communication Center (YIMER): The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.
 - www.yimer.gov.tr
 - Call Centre: 157
 - Phone number: +90 312 157 11 22
 - Fax number: +90 0312 920 06 09
 - Mail addressed to Republic of Türkiye, Directorate of Communications
 - Individual applications at the Republic of Türkiye General Directorate of Migration Management

Any grievance and feedback lodged/conveyed through CIMER and/or YIMER and related to the Project will be registered in the GM database and managed as per GM Procedures, as relevant, by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

The complaints through CIMER and/or YIMER are received by Department for Planning and Coordination under the General Directorate of ILBANK. If the complaint is related with Department of International Relations, Department for Planning and Coordination will forward the complaint to the GM Team with ensuring its anonymity and confidentiality. The complaints will be recorded by the GM Team to timely inform the project on taking corrective actions. Both CIMER and YIMER will complement GM throughout the project life.

9. GM Process

Complaints and feedbacks are admissible if they meet the following criteria:

- The complaint or feedback is about ILBANK projects financed by IFIs,
- The complaint or feedback is made by people, groups, communities, workers who works in ILBANK projects financed by IFIs organizations or their representatives affected by or who can influence the project,
- The complaint or feedback claims that the project is causing or may cause harm or create an additional benefit for its stakeholders; and
- The complaint or feedback is received from ILBANK Department of International Relations staff and/or Projects' related staff.

9.1. Registration of Complaint

ILBANK will appoint staff (s) for management of the GM. ILBANK and the grievance register (Appendix II – Grievance Register Table) will be kept regarding the complaints received through the means mentioned above. The complaints will be registered within 2 *business days* from the date of receipt. ILBANK notifies the complainant that complaint has been received within the period of registering the complaint (2 business days) and may request detailed information about the complaint from the complainant within this period.

When ILBANK receives a complaint, the GM Team will register and evaluate the complaint. If the complaint is related to any of the sub-projects, ILBANK will send the complaint to municipalities'/utilities' GM since they will have their own GM (there is a Project Implementation Unit for projects financed by ILBANK through IFIs). After this stage, ILBANK's role will be to follow the progress of the complaint within its GM system. If the complaint is not resolved within the committed duration, the ILBANK GM Team will take over the issue.

In order to establish an effective GM, a specific GM software will be designed and put in effect by ILBANK for its projects (the effectuation date will be determined in the upcoming months). Relevant software will be accessible and usable by the municipality focal staff members to register feedback and complaints.

9.2. Classification of Complaint or Feedback

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

Project Related Complaints

<u>Category</u>	<u>Description</u>	<u>Responsible Party</u>
Level 1	When an answer can be provided immediately and/or GM Team and Municipal/Contractor Community Engagement Officers are already working on a resolution	<ul style="list-style-type: none"> • GM Team • Municipal/Contractor Community Engagement Officers

Level 2	One off grievances that will not affect the project schedule or will not affect the reputation of the Bank	<ul style="list-style-type: none"> • GM Team • Municipal/Contractor Community Engagement Officers
Level 3	Repeated, extensive and high profile grievances that may jeopardize the Project or pose reputational risks	<ul style="list-style-type: none"> • GM Team • Ethics Committee • External Experts (when necessary)

Worker Complaints

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

9.3. Assessment of Complaint or Feedback

ILBANK examines and evaluates the complaints received from external stakeholders within *10 working days* and determines whether the complaint meets the admissibility criteria stated above by advising with the relevant personnel. Additional information and/or documentary evidence that justify the cause for the complaint may be requested from the complainant during the assessment process.

ILBANK staff complaints will be handled directly by the Ethics Committee (EC), while complaints received from related project staff will be assessed by the GM Team. In case the complaint received from related project staff contains sensitive issues, it will be directed to the EC with assurances of immediate anonymity and confidentiality. The duration of assessment of the worker/staff complaints will be the same as with the external complaints/feedbacks.

9.4. Addressing and Closing of a Complaint or Feedback

After the evaluation of the complaint, ILBANK will address and take corrective actions to resolve the complaint within *15 working days*. Within this period, relevant responsible parties to manage the grievance will be in communication with the recipient of the complaint at all times and all the communication will be recorded in the GM system. In case of a mutual agreement on closing of the complaint, the process set out in “Giving Feedback of Complaint Closure” section will be applied.

In case the complaint cannot be resolved due to the nature or timing of the required corrective action within 15 working days, ILBANK and the complainant may reach an agreement on extending the time to close the complaint. Relevant agreement will be documented and registered in the GM system with the consent of the applicant.

9.5. Giving Feedback of Complaint Closure

After the necessary actions are taken, ILBANK and the complainant will agree that the complaint is closed and the complainant will be informed in writing that the complaint has been closed.

If an agreement cannot be reached on the closure of the complaint, the complainant will be informed that he/she can apply other legal remedies (see below section “Right to Appeal”). After the notification of this process, the complaint is closed.

9.6. Right to Appeal

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

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

Relevant legal process will be monitored through GM.

10. Ethics Committee

The Ethics Committee (EC) is responsible for investigating all sensitive complaints referred by the GM team or by any member of staff.

The EC includes the Head of Department, Technical Group Manager and Social Expert under ILBANK Department of International Relations. Roles and responsibilities of Head of Department, Technical Group Manager and Social Expert are given below:

Head of Department

- To ensure that this procedure is implemented.
- To lead closure process of the Level 2 worker related grievances (Please see Section 9.2.) in line with this Procedure

Technical Group Manager

- To ensure the Level 2 worker related grievance (Please see Section 9.2.) closure process is carried out in line with this Procedure.

Social Expert

- To ensure the Level 2 worker related grievance (Please see Section 9.2.) closure process is carried out in line with this Procedure.
- To ensure the investigation and resolution of reported complaints in a timely and acceptable manner to this Procedure.

Once a complaint is received by the EC, it will examine if the complaint is indeed sensitive. If not, it refers the complaint back to the GM team. For sensitive complaints, the complainant has full rights to remain confidential under the Turkish Constitution and has the rights to apply to court (as per Turkish Labor Law No: 4857 and Turkish Civil Code Law No: 4721) at all time. Project employees will be able to send direct email to Ethical Committee (EC) based in ILBANK headquarter.

For cases related to sexual exploitation and abuse/sexual harassment (SEA/SH) at work place or any potential child abuse in the project sites, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers

10.1. Composition of the Ethics Committee

The EC members are independent in terms of conducting investigations and forms, with at least two senior level managers and one expert level staff representative from the Department of International Relations. The committee members will have sufficient availability in order to conduct investigations in the stated timeframes. They will also have in-depth knowledge of ILBANK's policies and procedures (Code of Conduct, Protection from Sexual Exploitation and Abuse (PSEA) policy, Financial Guide, Supply Chain Policy, etc.) as well as specific training on how to deal with sensitive complaints.

Each investigation will be conducted by at least two members of the Ethics Committee. If necessary, they will request an internal or external consultancy of experts related to the case, keeping in mind the confidentiality requirement for each case. This pool of experts may for example include a workplace gender diversity expert, an IT expert, and/or a legal expert. These technical members will either be consulted as advisors or may lead the investigation with the permanent members if required by the case.

Once the investigation is concluded, the final results are shared with the Board. The sanction process is based on the HR guidelines and the decision is taken by the Disciplinary Board of ILBANK.

If a complaint is raised against a member of the Ethics Committee, this member will have to be replaced by another relevant manager or expert during the investigation and decision process.

10.2. Principles

The core principles guiding the EC's investigation are:

- protection of the alleged victim;
- protection of the presumption of innocence of the accused person;
- confidentiality;
- impartiality; and
- due diligence.

10.3. Process & Timeframes

The Ethics Committee convenes within 48 hours of the reception of a sensitive complaint. In cases related to child abuse or SEA/SH, it will be immediately directed to the legal authorities such as Ministry of Family and Social Services and Prosecutors Office. The on-going process will be monitored by the EC and reported in the GM software in a confidential manner.

If the issue may constitute a criminal offence, the EC has the responsibility to immediately refer the case to the relevant public authorities. However, an internal investigation will be conducted in parallel in order to gather evidence about whether or not the allegations are well founded.

The GM Team conducts proceedings together with the Ethics Committee on the progress of the investigation and informs the community member regularly. Initial investigation for sensitive complaints will be completed in 5 days by the Ethics Committee, and the investigation is made within a month at the latest to resolve the complaint.

11. Monitoring of the GM

The GM will be monitored by the Monitoring and Evaluation (M&E) Expert that will be employed in ILBANK Department of International Relations. The M&E Expert will be supervising the GM Team and the M&E Expert will be responsible for monitoring and evaluating the effectiveness of the mechanism while also following-up on the GM system is practiced in line with the principles indicated in Section 7 “Principles of GM”.

The GM team members will report and meet monthly with the M&E Expert concerning problems encountered during handling of the complaints. The mechanism will be revised 3 months after the initial set-up through consultation with the ILBANK Department of International relations staff, Municipal/Contractor CLOs and also complainants whose applications have been closed or still on-going.

12. Reporting of the GM

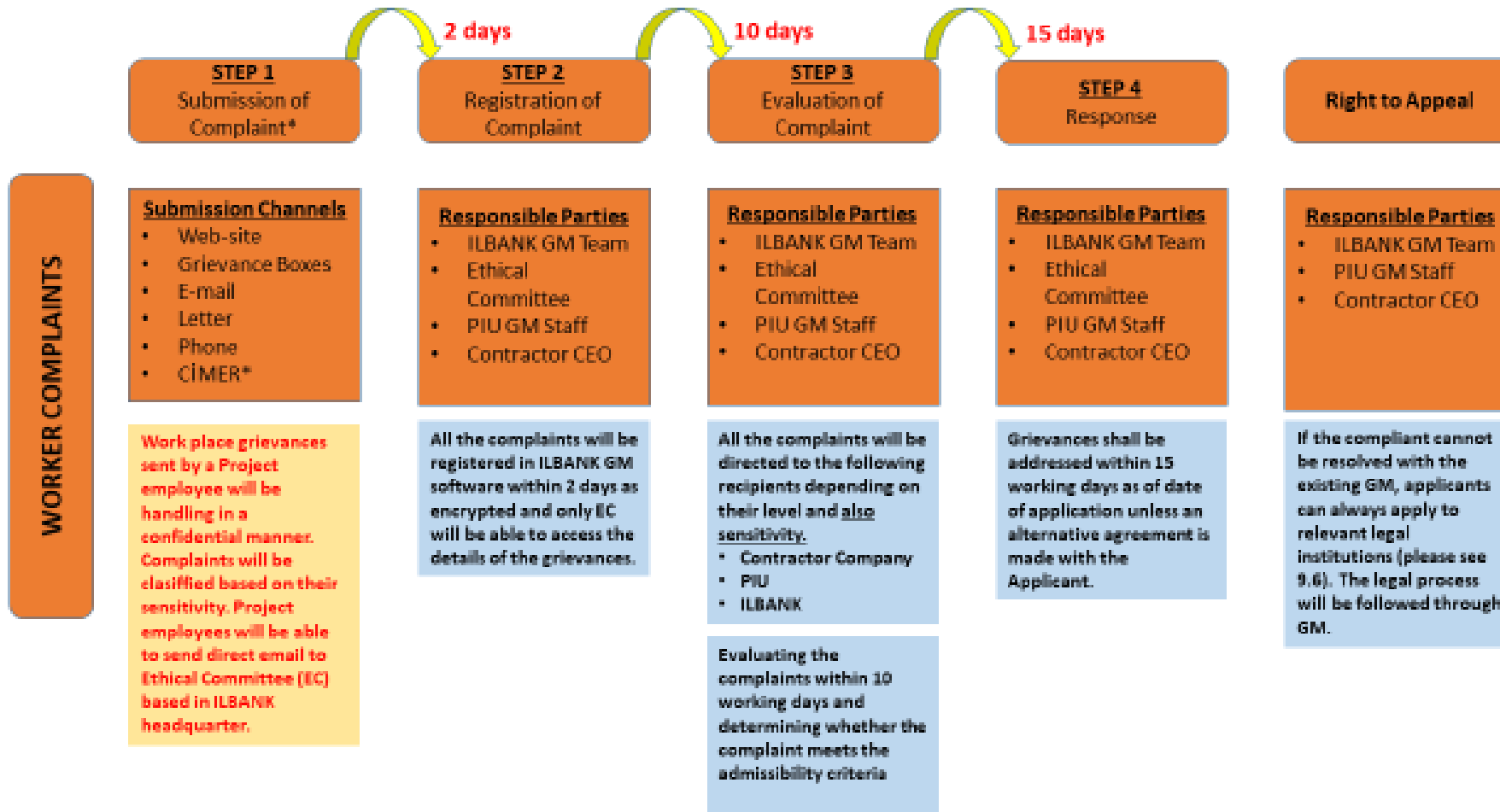
The GM Team will provide a statistical and qualitative analysis of feedback and complaints as well as their outcomes every two months to the M&E Expert who will review it and disseminate it to the Ethics Committee, Head of Department of International Relations and the Deputy General Director of ILBANK Department of International Relation. In addition, the relevant complaints and their actual status will be reported in the monitoring reports (e.g. Environmental and Social Management Plan Monitoring Reports) prepared in accordance with the agreements made with International Financial Institutions (IFIs). The reports will only include information regarding the complaint as much as necessary, and any personal information on the individuals having used the GM will remain confidential and will never be shared in these reports.

The aim of these reports is to serve as a learning tool, for the improvement of the quality of ILBANK’s projects.

Appendix 1: Grievance Mechanism Flowchart



*All the complaints received from these channels will be recorded by ILBANK GM Team then PIU GM Staff and Contractor CEO will be informed



*All the complaints received from these channels will be recorded by ILBANK GM Team then PIU GM Staff and Contractor CEO will be informed

Appendix 2: – Grievance Register Table and Templates for Complaint Register/Close-Out Form

#	Complaint Register Number	How Complaint is Received (Grievance Form, Community Meeting, Telephone)	Level of Grievance (Municipality/Utility Level, Regional Ilbank Office, ILBANK HQ Level)	Date of Complaint Received	Location of Complaint Received	Name of Person Receiving Grievance	Land Parcel # (If complaint is related to land)	Complainant Information					Project Component Related to Complaint	Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.)	Complaint Summary	Grievance Status (open, closed or pending)	Action Taken				Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol)
								Name/Surname	ID Number	Telephone/e-mail	Village-District	Gender					Responsible Person/Department	Action Planned	Due Date of the Addressing the Grievance	Date of Action Taken	
1																					

PROJECT NAME				
COMPLAINT REGISTER FORM				
Person Filling the Form:	Date:			
Interview Agenda:	Reference No:			
1. INFORMATION ABOUT THE COMPLAINANT				
Name Surname:	How to receive the complaint			
Turkish ID Number:	Phone <input type="checkbox"/>			
Phone:	Face to face <input type="checkbox"/>			
Address:	Web-site/ E-Mail <input type="checkbox"/>			
E-Mail:	Other (Explain) <input type="checkbox"/>			
Stakeholder Type				
Public Institution <input type="checkbox"/>	Project Affected People <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Trade Association <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industry Associations <input type="checkbox"/>	Workers' Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
2. DETAILED INFORMATION ON THE COMPLAINT				
Description of the Complaint:				
Resolution method requested by the complainant				

**Registered Person Name
Surname/Signature**

Complainant Name Surname/Signature

		PROJECT NAME	
		COMPLAINT CLOSE OUT FORM	
Reference No:			
1. DETERMINATION OF CORRECTIVE ACTION			
1			
2			
3			
4			
5			
Responsible Departments			
2. CLOSE OUT THE COMPLAINT			
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Complaint Registration Form" is resolved.</i>			

Date:

**Name Surname /
Surname /
Signature of the Person
Complainant
Closing the Complaint**

**Name,
Signature of**

...../...../.....