



ILBANK

**Stakeholder Engagement Plan (SEP) - Climate and Disaster Resilient
Cities Project - P173025**

Stakeholder Engagement Plan (SEP)

January 2022

Contents

Abbreviations.....	1
1. Introduction	1
2. Rationale for a Stakeholder Engagement Framework (SEF)	1
3. Objectives of the SEF	1
4. Stakeholder Engagement Process	2
4.1. <i>Stakeholder Identification</i>	2
4.2. <i>Methods for Stakeholder Engagement</i>	3
4.3. <i>Timing of Stakeholder Engagement</i>	4
5. Institutional Arrangements for Stakeholder Engagement	5
6. Key Principles of Stakeholder Engagement.....	5
7. Grievance Mechanism.....	6
7.1. <i>Project Specific Grievance Mechanism</i>	6
7.2. <i>World Bank Grievance Redress System</i>	6
8. Monitoring and Reporting.....	6
Annex -1 Grievance Mechanism.....	8

Abbreviations

CEO	Community Engagement Officer
ESMF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
ILBANK	İller Bankası A.Ş.
MoEU	Ministry of Environment and Urbanization
MoH	Ministry of Health
NGO	Non-governmental Organization
PAP	Project Affected People
RF	Resettlement Framework
RP	Resettlement Plan
SEP	Stakeholder Engagement Plan
WB	World Bank
WHO	World Health Organization

1. Introduction

Turkey has been affected by the climate and disaster risks including pluvial, fluvial, and coastal flooding; earthquakes and landslides; extreme heat (and heavy snow in remote mountainous areas); water scarcity and droughts; and wildfires. These risks have an impact on infrastructure through direct damage, disruption of physical infrastructure networks, delays in service provision or maintenance, and cascading failures from interdependent infrastructure networks (e.g. the collapse of buildings from earthquakes can damage the pipes/lines of water, gas, electricity, telephone and internet). Managing climate change and disaster risk requires enhanced efforts in developing resilient infrastructure. Urban Resilience Project has been developed by the participation of Ministry of Environment and Urbanization (MoEU), ILBANK and World Bank to support the Government of Turkey to enhance resilience to seismic risk and build capacity to manage the impacts of natural disasters in participating municipalities.

The five metropolitan municipalities of Izmir, Istanbul, Tekirdag, Kahramanmaras, and Manisa have been selected for the project. The project will continue to focus on developing a comprehensive approach to expand access to finance to rightholders living in risky buildings to be able to afford the retrofit and/or reconstruction, along with investments in infrastructure resilience in these municipalities. The total proposed loan amount is 500 million Euro (US\$553.08 million) where 167 million Euro of this amount is allocated for the Environmental Resilient Infrastructures which will be under ILBANK's responsibility.

While undertaking works and activities to meet the objectives stated above, ILBANK and the borrowing municipalities will also aim to ensure the continuous involvement and participation of their stakeholders throughout the project life.

2. Rationale for a Stakeholder Engagement Plan (SEP)

This Stakeholder Engagement Plan (SEP) forms a part of the Environmental and Social Management Framework (ESMF) of the “Turkey: Urban Resilience Project” (hereinafter referred to as “the Project”).

This SEP is a framework document that outlines the engagement approach and methodology that the investing municipalities will adapt for their projects has been prepared by ILBANK as a guiding document during the preparation of sub-project specific SEPs. The 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). The process ensures that a sound engagement approach is set in order to increase active participation and involvement of all project stakeholders through a range of activities and tools during the entire life of the Project (design, preconstruction, construction, operation, decommissioning).

3. Objectives of the SEP

The goal of this SEP is to improve and facilitate decision making and create continuous dialogue with 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 Stakeholder Engagement Plans (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 issues that could potentially create an impact
- To ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format
- 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 licence” 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.

4. Stakeholder Engagement Process

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

4.1. Stakeholder Identification

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 find it more difficult to participate in project activities and those who may be differentially or disproportionately affected by the Project due to their marginalized or vulnerable status. Therefore, it is important that municipalities investigate the impacts of their sub-projects on different stakeholders. The engagement method should be tailored to each identified stakeholder ensuring their involvement in the project.

The SEP will be a living document that will be updated and revised according to changing circumstances of the sub-projects. Stakeholders identified in the design phase of a project may change during implementation and therefore will need to be updated accordingly.

Stakeholders will be identified on a continuing basis by the determination of:

- Various stakeholder categories that may be *affected by*, or be *interested in*, the sub-project;
- Specific individuals¹ (including vulnerable), groups, and organizations within each of these categories 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

¹ Project specific vulnerable groups are anticipated as: Syrians under Temporary Protections (SuTPs), people under International Protection (IP) such as Afghans, Iranians, Pakistanis etc.; minorities, woman headed households, elderly population, individuals who are homeless or living in unstable housing situations, individuals with mental health issues, individuals with chronic or acute illness or conditions, individuals who are socioeconomically or educationally disadvantaged.

- 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, the frequency and intensity of the engagement method will proportionally increase. Hence, it is important that the project specific SEPs are prepared in line with the available ESMF/ESMPs and/or RF/RPs to determine the level of environmental and social impacts on relevant stakeholders. These project documents will provide information on vulnerable groups (if any) such as women, elderly, disabled, refugees, seasonal workers etc. that all need to be considered during the preparation of SEPs. All engagement methods selected should be culturally acceptable and appropriate for each of the different stakeholder group targeted.

4.2. Methods for Stakeholder Engagement

A variety of engagement techniques can 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 found the basis of the 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 1 below. These methods and tools are generic and need to be revised accordingly once the project specific SEPs are prepared.

Table 1. Engagement Methods to be employed under the Project

Engagement Method	Application of the Method	Possible 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
One-on-one meetings	<ul style="list-style-type: none"> - Information collection on an individual basis allowing to speak freely 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 high level stakeholders - Establishing relations with high level stakeholders 	Other relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, national and local media
Public consultation meetings	<ul style="list-style-type: none"> - Information sharing (especially non-technical) to a large group of stakeholders, especially communities - Receiving comments, feedback, views and perception of project from a group of stakeholders - Collecting grievances and concerns related to the project - Establishing relations with impacted communities, and groups 	Impacted communities and groups, local NGOs, local government, businesses and organisations/agencies
Face to face interviews	<ul style="list-style-type: none"> - Baseline data collection on an individual basis with impacted PAPs 	Project affected people, workers

Engagement Method	Application of the Method	Possible Stakeholder
	<ul style="list-style-type: none"> - Monitoring of project environmental and social impacts and activities on an individual basis - Establishing relations on an individual basis 	
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 of project environmental and social impacts and activities on a certain group - Establishing relations with certain groups 	Certain target groups, vulnerable groups
Project / Municipality / ILBANK website	<ul style="list-style-type: none"> - Information sharing and progress updates - Disclosure of ESIA, ESMP, RF, RP, Ex post social audit and other relevant project documentation - Announcements of key events, dates and published documents 	Impacted communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies
Social media (Facebook, Twitter, Instagram accounts, WhatsApp groups)	<ul style="list-style-type: none"> - Non-technical information sharing and progress updates - Announcements of key events, dates and published documents 	Impacted communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies
Project information brochures/leaflets	<ul style="list-style-type: none"> - Sharing brief project information to provide regular update - Inform on certain issues such as land acquisition, land entry and exit, project time schedule etc. - Dissemination of site specific project information 	Impacted communities and PAPs, businesses and organisations/agencies

The project will take special measures to ensure that disadvantaged and vulnerable groups’ (women, elder, disabled and refugees) have equal opportunity to access information, provide feedback, or submit grievances. Vulnerable stakeholder identification will also be an on-going process and will require regular review and update. Accordingly, engagement methods can be tailored to inform women, elder, disabled and refugees and understand their views and concerns in an appropriate manner. Focus group meetings, women meetings, organization of translator for refugees that will be dedicated specifically to vulnerable groups may also be envisaged as appropriate. All the surveys, consultations and other means of communications will be conducted in accordance with the language that stakeholder groups preferred. Potential languages are anticipated at this stage as Arabic, Pashto, Dari and Persian.

COVID-19 Conditions:

The COVID-19 epidemic has affected the whole world and measures such as wearing masks and maintaining social distance in society have become the new normal of our daily lives. If the COVID 19 pandemic conditions continue during the operation phase of the project and the implementation of this SEP, the stakeholder engagement plan and its activities will be aligned and implemented in accordance with the guidelines of relevant and responsible national and international organizations such as WHO, Ministry of Health and Ministry of Environment and Urbanization.

Within the scope of SEP, face-to-face meetings will be held in accordance with mask and social distance rules of Ministry of Health (MoH) and World Health Organization (WHO). In cases where face-to-face meeting is not possible due to the COVID- 19 conditions, online interview methods can also be used. In addition, it will be ensured that the meetings to be held will be organized in open areas, in accordance with social distance and other regulations of MoH and WHO.

Apart from these measures, other practices outlined in the “Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19” and WB ESF/Safeguards Interim Note: COVID-

19 Considerations In Construction/Civil Works Projects note will also be used on planning stakeholder engagement activities.

4.3. Timing of Stakeholder Engagement

Timely application of the stakeholder engagement activities that will be conducted during ESIA/ESMP and RP implementation are critical in supporting the Project’s risk management process, especially during the early identification and avoidance/management of potential negative and positive impacts that 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 that will be prepared by the municipalities will be expected to present a stakeholder engagement strategy that covers the entire life span of the project, showing the timing and frequency of engagement activities that will be carried out under each project phase.

5. Institutional Arrangements for Stakeholder Engagement

The management, coordination and implementation of the project specific SEPs and its integral tasks will be the responsibility of dedicated team members within the relevant municipality. In administering the SEP, the sub-borrower municipalities will be responsible of:

- Preparing and updating the content of the draft SEP (in line with this SEP) and sharing it with ILBANK for final approval;
- Disclosing the draft SEP before tendering process starts for civil works;
- Assigning dedicated staff for the implementation and monitoring of engagement activities;
- Preparing relevant engagement tools and material committed under the project specific SEP and their timely application and/or dissemination;
- Approving and facilitating all stakeholder engagement events and disclosure of material to support stakeholder engagement events;
- Keeping records of all engagement activities and to monitor and report 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.

6. Key Principles of Stakeholder Engagement

This SEP and relevant project specific SEPs 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.

7. Grievance Mechanism

7.1. Project Specific Grievance Mechanism

ILBANK already established a Grievance Mechanism in September 2021 and relevant mechanism will be in place during the course of the Project. Detailed Grievance Mechanism process and Sample Grievance Forms are added as Annex 1.

Apart from the ILBANK Grievance Mechanism, a grievance mechanism will also be established by the municipalities in order to receive, resolve and follow the concerns and complaints of the project affected communities. Municipalities' PIU and construction contractor will be accessible for the stakeholders and respond to all grievances (complaints, requests, opinions, suggestions) at the earliest convenience. This mechanism will be connected and communicate with the ILBANK GM and all the complaints, requests, opinions and suggestions will be recorded in ILBANK GM software. Relevant grievances will be monitored by the ILBANK GM Team (please see Annex 1).

In addition, the project specific GM will include a channel to receive and address confidential complaints related with Sexual Exploitation and Abuse/Sexual Harassment (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 directly go to police station, 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. Municipality PIU receiving the SEA/SH related grievance should direct this 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.

7.2. 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> . 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 3.

Table 3. Sample Key Performance Indicators by Project Phase

Project Phase	Indicator	Verification Method
Design and Planning	Preparation of sub project specific SEPs	# of 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 SEP	Names of staff appointed
	Establishment of Project GRM	Operational GRM
Construction	Raising awareness on Project activities	# of meetings held 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 of reporting to ILBANK semi-annually on project progress. Sub-project specific progress reports will also include a section on stakeholder engagement activities conducted 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 in SEP (if any).

Annex -1 Grievance Mechanism of ILBANK

Grievance Mechanism (GM)

ILBANK Policy and Procedure No.....

Table of Contents

1.	Introduction	1
2.	Purpose	1
3.	Scope	1
4.	Reference	1
5.	Responsible parties.....	1
5.1.	<i>GM Team</i>	2
5.2.	<i>Project Implementation Unit</i>	2
5.3.	<i>Ethic Committee</i>	3
6.	Adoptation Procedure	3
7.	Principles of GM.....	3
8.	Submission of a Complaint	4
8.1.	<i>Who May Use the GM?</i>	4
8.2.	<i>How to Submit a Complaint?</i>	4
9.	GM Process	6
9.1.	<i>Registration of Complaint</i>	6
9.2.	<i>Classification of Complaint or Feedback</i>	7
9.3.	<i>Assessment of Complaint or Feedback</i>	8
9.4.	<i>Addressing and Closing of a Complaint or Feedback</i>	8
9.5.	<i>Giving Feedback of Complaint Closure</i>	8
9.6.	<i>Right to Appeal</i>	9
10.	Ethics Committee.....	9
10.1.	<i>Composition of the Ethics Committee</i>	9
10.2.	<i>Principles</i>	10
10.3.	<i>Process & Timeframes</i>	10
11.	Monitoring of the GM.....	10
12.	Reporting of the GM	11

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 No..... 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.

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

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

- 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

PIU of 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 PIU of the

Municipalities/Utilities, together with contractors and supervision consultants, has to ensure that GM is implemented effectively.

PMU and PIU will use same Grievance Register Software for implementation of GM. When PIU registered a complaint according to the PIU GM procedure into the Grievance Register Software, PMU will monitor all process of complaint by the Grievance Register Software.

When the PMU receives a complaint related to a sub-project, it will assign the related PIU to 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. *Ethic Committee*

The Ethic committee (EC) is responsible for investigating all sensitive complaints³ referred by the GM team or by any member of ILBANK PMU staff. EC is established with 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.

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.

- **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.
- **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 : www.ilbank.gov.tr
- E-mail : TBD@ilbank.gov.tr
- Phone : 0312 (**TBD**)
- Official Letter : ILBANK Department of International Relations, GM Team - Kızılırmak Mahallesi Ufuk Üniversitesi Caddesi No:12 Çukurambar / Çankaya / Ankara

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.

- 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 Turkey, 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
 - Fax number: +90 0312 920 06 09
 - Mail addressed to Republic of Turkey, Directorate of Communications
 - Individual applications at the Republic of Turkey 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 will be 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 : TBD@ilbank.gov.tr
- Official Letter : ILBANK Department of International Relations, GM Team - Kızılırmak Mahallesi Ufuk Üniversitesi Caddesi No:12 Çukurambar / Çankaya / 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
 - Fax number: +90 0312 473 64 94
 - Mail addressed to Republic of Turkey, Directorate of Communications
 - Individual applications at the community relations desks at governorates, ministries and district governorates

- 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 Turkey, Directorate of Communications
 - Individual applications at the Republic of Turkey 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 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 received a complaint, GM Team will register and evaluate the complaint. If the complaint is related with any of sub-projects, ILBANK will send the complaint to municipalities'/utilities' GM since they will (there is a Project Implementation Unit for projects financed by ILBANK through IFI) have their own GM. 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, 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 the reputation of the Bank.	<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 the reputation of the Bank	<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 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, relevant complaint will be directed to EC with ensuring the anonymity and confidentiality immediately. The duration of assessment of the worker/staff complaints is the same 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 at all time and all the communication will be recorded in the GM system. In case of settle a mutual agreement on closing of the complaint, process is provided in “Giving Feedback of Complaint Closure” section will be applied.

In case of the complaints that 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 agree that the complaint is closed and the complainant is informed 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.

EC is established with a senior manager, a manager and a staff representative under the ILBANK Department of International Relations. Roles and responsibilities of senior manager, manager and staff representative are given below:

Senior Manager

-

Manager

-

Staff Representative

-

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, 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 the cases relevant 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 in 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 is conducted by at least two members of the Ethics Committee. If necessary, they will request internal or external consultancy from 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 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
- due diligence

10.3. Process & Timeframes

The Ethics Committee convenes within 48h of the reception of a sensitive complaint. In cases related to child abuse or sexual exploitation and abuse, 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 can constitute a criminal offence, the EC has the responsibility to immediately refer the case to the relevant public authorities. However, the 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 to monitor and evaluate the effectiveness of the mechanism while also following-up the system is practiced in line with the principles indicated in Section 7 "Principles of GM".

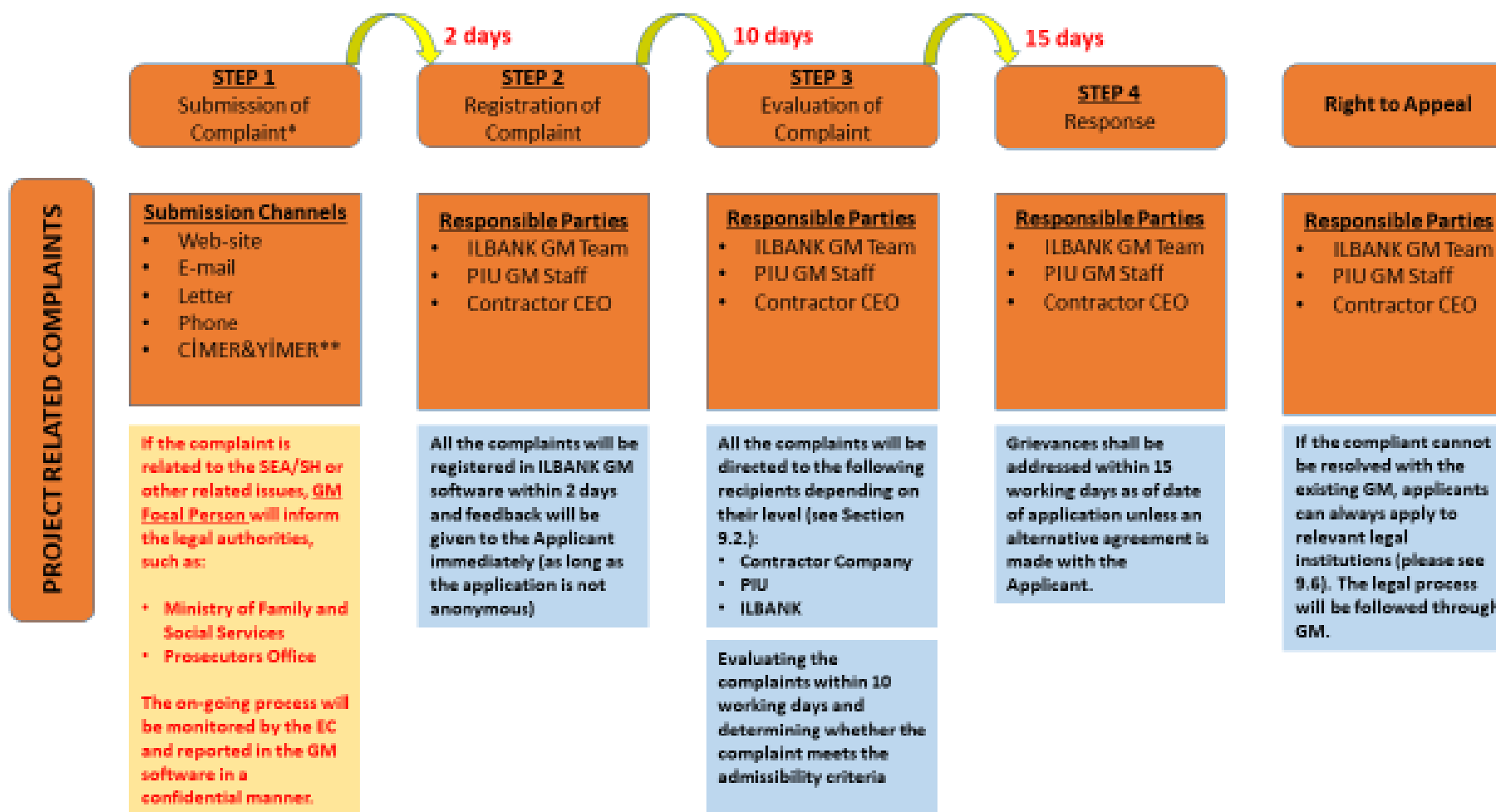
The GM team members will be reporting and meeting monthly with the M&E Expert concerning problems encountered during handling of the complaints. The mechanism will be revised 3 months after the initial set-up through consultation with the ILBANK Department of International relations staff, Municipal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

12. Reporting of the GM

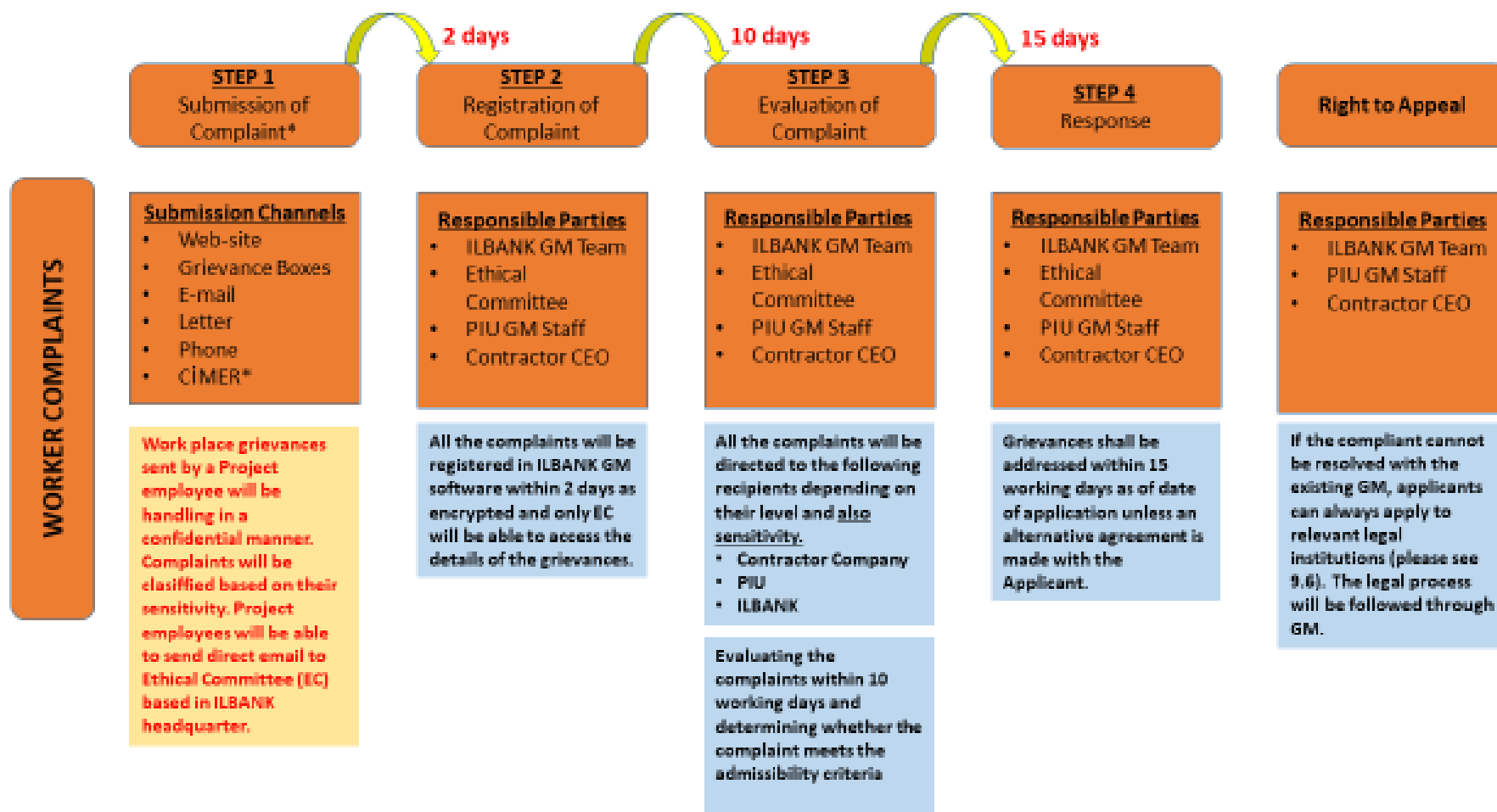
The GM Team will provide a statistical and qualitative analysis of feedback and complaints as well as their outcomes every two months to the M&E Expert who will review it and disseminate it to the Ethics Committee, Head of Department of International Relations and the Deputy General Director of ILBANK 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

No	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	

		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"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>
		Workers' Union	<input type="checkbox"/>	Media	<input type="checkbox"/>
				NGO	<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 /
Signature of the Person
Closing the Complaint**
**Name, Surname /
Signature of Complainant**

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