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**MINISTRY OF INDUSTRY and TECHNOLOGY
DIRECTORATE GENERAL OF DEVELOPMENT AGENCIES**

**SOCIAL ENTREPRENEURSHIP, EMPOWERMENT AND
COHESION IN REFUGEE AND HOST COMMUNITIES IN TURKEY
PROJECT**

GRIEVANCE MECHANISM MANUAL

19 July 2023

Revised



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TABLE of CONTENTS

1.	INTRODUCTION	5
2.	WHO CAN USE THE SEECO GM?	6
3.	GM PURPOSE and SCOPE.....	7
4.	GRIEVANCE/FEEDBACK INTAKE CHANNELS	9
5.	RESPONSIBLE PARTIES	11
6.	DISSEMINATION OF INFORMATION REGARDING THE GM.....	14
7.	GRIEVANCE PROCEDURES.....	15
7.1.	Stakeholder Grievances	15
7.2.	Workers Grievances	17
7.2.1	Who can use the Worker GM	18
7.2.2	Worker Grievance Intake Channels	19
7.2.3.	21
7.3.	Mechanism for Addressing SEA/SH Related Grievances	26
7.3.1.	Guiding Principles for Handling SEA/SH Related Grievances.....	27
7.3.2.	Step by Step Procedure for Handling SEA/SH Related Grievances.....	28
7.3.3.	Monitoring and Reporting on SEA/SH Grievance Mechanism.....	35
7.3.4.	Governance of SEA/SH Grievance Mechanism and Responsibilities.....	35
8.	APPEAL MECHANISM.....	39
9.	WORLD BANK GRIEVANCE REDRESS SERVICE	39
10.	MONITORING AND REPORTING	40
	ANNEX 1 GRIEVANCE MECHANISM FLOWCHART	42
	ANNEX 2 GRIEVANCE REGISTER TABLE.....	44
	ANNEX 3 SAMPLE GRIEVANCE FORM.....	46
	ANNEX 4 SAMPLE GRIEVANCE CLOSEOUT FORM.....	47
	ANNEX 5 OVERVIEW of GM FOCAL POINTS	48
	ANNEX 6 SERVICE PROVIDERS for SURVIVORS of SEA/SH.....	49
	ANNEX 7 COMPLAINT FORM FOR SEA/SH CASES	53
	ANNEX 8 CONSENT FORM for SERVICE PROVIDER & INTERNAL INVESTIGATION	53
	ANNEX 9 SEA/SH GRIEVANCE MECHANISMS: Dos and DON'Ts.....	56



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LIST of FIGURES

Figure 1. Operational Flow of GRM	15
Figure 2. Flowchart of SEA/SH Grievance Mechanism	31

LIST of TABLES

Table 1. Responsible Parties in GM Implementation at Each Defined Level	12
Table 2. The Different Stages of Handling Worker’s Grievances	25
Table 3. Roles and Responsibilities on SEA/SH Grievance Mechanism	36
Table 4. GM Reporting and Requirements on Reporting Process	40



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ABBREVIATIONS

CC	Construction Contractors
CIP	Community Implementing Partner
CİMER	Presidency's Communication Center
CoC	Code of Conduct
DA	Turkish Development Agencies
ESS	Environmental and Social Standards
E&S	Environmental and Social
GBV	Gender Based Violence
GM	Grievance Mechanism
LA	Local Authorities
LMP	Labor Management Procedures
MIS	Management Information System
MoIT	Ministry of Industry of Technology
NGO	Non-Governmental Organizations
PIU	Project Implementation Unit
POM	Project Operational Manual
SEECO	Social Entrepreneurship, Empowerment and Cohesion Project
SEP	Stakeholder Engagement Plan
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
WB	World Bank
YİMER	Foreigners Communication Center



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1. INTRODUCTION

The Grievance Mechanism (GM) is a process that allows any stakeholder to submit a complaint, raise a concern or provide feedback, such as suggestions, inquiries and compliments, regarding the planning, implementation or management of a project.

The Social Entrepreneurship, Empowerment and Cohesion Project (SEECO) is being implemented by the Ministry of Industry and Technology (MoIT), Turkish Development Agencies (DAs), Community Implementing Partners (CIPs) and Local Authorities (LAs) through three components. The project will finance activities to support social entrepreneurship in refugee and host communities, including training and support services for entrepreneurs and sub-grants for incubation or acceleration of social enterprises. The social enterprise, livelihoods facilities, and institutional support components together meet the following economic, social, and institutional goals: (i) to expand economic opportunities for mostly women refugee and host community members through support for social enterprises and vital livelihoods facilities; (ii) to improve social cohesion between refugees and host communities through social enterprise development and participatory engagement in livelihoods facilities; and (iii) to enhance the institutional capacities of the MoIT, TDAs, local authorities, other relevant government agencies, and local development partners to support women's social enterprises.

SEECO is currently establishing a transparent and comprehensive GM to receive, evaluate and handle grievances and feedback in compliance with the World Bank's Environmental and Social Standards (ESS). The GM is a key project tool to mitigate, manage, and resolve potential or realized Project impacts, as well as fulfil obligations under international standards and create positive relations with people affected by the Project, employees and other interested parties. Additionally, the GM provides timely input to the PIU on Project challenges and allows for effective identification of issues that need to be addressed. This GM manual has been prepared by the SEECO Project Implementation Unit (PIU) with the purpose of outlining the critical elements of the **project-specific stakeholder GM** and the separate **GM for project workers**.

The manual includes, the types of eligible grievances, the feedback intake locations and channels, the resolution timelines, grievance procedures to be followed, monitoring and reporting arrangements and responsibilities for each task to ensure accountability in the grievance management process. The



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manual structure is as follows: **Chapter 2** describes who the SEECO GM is intended for. **Chapter 3** provides the GM’s purpose and scope. **Chapter 4** describes the feedback intake channels and **Chapter 5** outlines the GM responsibilities of each of the project implementing partners. **Chapter 6** details how stakeholders will be informed about the availability of the GM. **Chapter 7** describes the project-specific grievance procedures. **Chapter 8** provides information about the World Bank Grievance Redress Services. **Chapters 9 and 10** detail the procedures for monitoring and reporting project grievances under SEECO.

2. WHO CAN USE THE SEECO GM?

All project stakeholders will have access to the GM, which includes **project affected parties**¹ (refugees, host community members, social enterprise employees, contractors, project staff, government authorities) and **other interested parties** (private sector, NGOs, media, etc.).

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

- Project’s beneficiaries
- Communities that could potentially be affected by the construction/renovation activities at the buildings
- CIPs and CCs Workers
- Members of the PIU
- Other parties (NGOs, etc.)

Project stakeholders have, among others, the following rights under the Project:

- Right to information
- Right against inappropriate intervention by an outside party
- Right to a project free of fraud and corruption

Project stakeholders may file a grievance and provide feedback if s/he believes one or more of these rights have been infringed, or if any of the Project’s principles and procedures have been violated.

¹ Those who are likely to be directly or indirectly affected positively or negatively by the Project.



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3. GM PURPOSE and SCOPE

The objective of the GM is to assist in the resolution of grievances in a timely, efficient, fair and transparent manner that gives credibility to the process and contributes to lasting outcomes. It also aims to build trust and cooperation between project implementing partners and stakeholders. Specifically, the GM aims to:

- provide affected people with avenues for providing feedback, including submitting a grievance or resolving any dispute that may arise during the course of the implementation of projects.
- ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.
- support accessibility, anonymity, confidentiality and transparency in handling complaints and grievances.
- support the complainant's need to apply judicial proceedings if they are dissatisfied with the GM.
- reduce conflicts and risks such as external interference, corruption, social exclusion or mismanagement.
- improve the quality of project activities and results by serving as a feedback and learning channel for project management regarding the strengths and weaknesses of project procedures and implementation processes.

Currently, the DAs and MoIT receive formal requests and grievances through the Presidential Communication Center (CIMER), Foreigners Communication Center (YIMER) or directly through DA web channels. Given that all kinds of complaints are received by CIMER/YIMER from the public and tracing project-specific requests, concerns or complaints will be difficult, it was considered necessary to establish a project-specific grievance mechanism for all stakeholders, directly or indirectly affected by the Project to ensure compliance with World Bank ESS10.

The GM for the SEECO Project is being established based on the following guiding principles:

Fairness: Grievances will be treated confidentially, assessed impartially, and handled transparently.



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Objectiveness and independence: The GM will operate independently of all interested parties to guarantee fair, objective, and impartial treatment of each case. The GM officials will have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).

Simplicity and accessibility: Procedures to file grievances and seek action will be simple enough that project beneficiaries can easily understand and access them. The Project beneficiaries will have a range of contact options including a telephone number, an e-mail address, a postal address, and the ability to submit grievances in-person. The GM will be accessible to all stakeholders, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income. The GM will not use complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices).

Responsiveness and efficiency: The GM will be responsive to the needs of all complainants. Accordingly, officials handling grievances will be trained to take effective action and respond quickly to, grievances and suggestions.

Speed and proportionality: All grievances, simple or complex, will be addressed and resolved as quickly as possible (within 15 days unless otherwise communicated to the claimant). The action taken on the grievance or suggestion is swift, decisive, and constructive.

Participatory and social inclusion: A wide range of project-affected people - refugees, community members, members of vulnerable groups, project implementers, civil society, and the media—will be encouraged to bring grievances and comments to the attention of the project authorities. Special attention will be given to ensuring that refugees, and marginalized groups, including those with special needs, are able to access the GM, by providing the opportunity to submit grievances verbally directly to CIPs on site.

Confidentiality and anonymity: All grievances/feedbacks received will be treated with respect to dignity, rights, wishes and choices of complainants and strictly observe confidentiality at all stages of the process. The GM will allow anonymous complaints through its different intake channels to ensure all people feel safe when raising sensitive issues or the situations that they may feel the risk of retaliation.



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The **Project Stakeholder GM** is complementary to other project-specific feedback-seeking and engagement activities defined in the Project [Stakeholder Engagement Plan](#) (SEP). In parallel, the MoIT PIU is setting up a **Grievance Mechanism for project workers**, including staff of MoIT, DAs and contracted workers. The GM for project workers is being established in line with the Project Labor Management Procedures (LMP) and ESS2 (Labor and Working Conditions) requirements as described in Chapter 5.2 of the GM manual.

4. ELIGIBILITY OF COMPLAINTS

The following criteria will be used to assess and verify the eligibility of the complaints when they are received by different intake channels of GM;

- The issue is within the Implementing Agency's mandate and falls within the scope of the GM
- The complainant is anonymous or identifiable with a name and contact details provided
- The complainant is affected by SEECO project
- The grievance is clear;
- The complaint has a direct relationship to SEECO project or activity; and
- All the mandatory preliminary information is available.

The purpose of this step is to ensure that the issue being raised is relevant to SEECO or its activities. If the complaint is not eligible, the complainant will immediately be informed of the reasons. The assessment at this step will also enhance decision making as to whether the complaint should be directed to a different entity.

5. GRIEVANCE/FEEDBACK INTAKE CHANNELS

The GM offers several different channels for providing feedback. Beneficiaries and other interested parties can decide on the most appropriate means of raising their complaints, concerns or requests based on their preference. In order to capture and track grievances received under the Project, a dedicated Feedback Management Information System (FMIS) will be established.

Within the scope of SEECO, grievances/concerns/suggestions will be handled at the following four levels: (a) community level; (b) construction contractors' level; (c) regional DAs level; (d) central level



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MoIT Project Implementation Unit (PIU). This feedback provider/complainant can also submit his/her concerns/grievances through existing channels/avenues such as CIMER/YIMER or the judiciary, which are outside the project-level GM.

- A. Community Level. To ensure that the GM is accessible to people at the community level, they will have the option to report their complaints/feedback to designated *grievance focal points* who are staff in the CIPs. To support women to engage in feedback, the CIPs will appoint community-level ombudswomen (who could also be GM Teams) to support vulnerable women to report issues that arise.
- B. Construction Contractors (CC) Level²: CCs will appoint designated GM focal points to transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by DAs/MoIT PIU.
- C. Regional/DA Level. DAs will have appointed GM focal points that can either receive feedback directly from stakeholders or to whom the community level GM focal points can escalate issues/complaints.
- D. Central/PIU Level. Feedback providers have the option to contact the PIU directly with any project related complaints, including for the purpose of escalating an issue that has not been addressed at a lower GM level. The PIU's Social Specialist is assigned as a GM focal point and s/he will be responsible for the overall coordination and monitoring of GM. The MoIT/PIU Team will make a final decision after a thorough review of the investigation and verification findings and if required, a grievance commission consisting of PIU Members (SEECO Project Coordinator, SEECO Social Specialist, MoIT Specialist and DA Specialist from the area where the complaint is received) will be established for more complex cases.

The GM focal point at each level will be responsible for performing the functions required for all types of grievances (stakeholder grievances, worker grievances and SEA/SH related grievances) that will be explained separately in further sections. The list of the GM focal points assigned at each level including their contact information is given in Annex 5.

² The Construction Contractors will provide an office to receive the Project related feedbacks/grievances.



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The grievance form provided in Annex 3 is the standard form for submitting grievances, although grievances can also be submitted in-person verbally (to GM Focal Points of CCs and CIPs). The submission of anonymous grievances is also possible in case of the confidentiality needs of the claimer.

Grievance numbers and topics will be disclosed publicly in quarterly periods in aggregate format and without identifying the features of the claimant. The identity of all those who have filed grievances will be treated confidentially. There will be no charge for filing a grievance.

6. RESPONSIBLE PARTIES

Ministry of Industry and Technology and Project Implementation Unit (MoIT/PIU)³ will take overall responsibility for the GM and act as the main implementing party.

The following parties will be involved in the grievance management process of the Project with differentiated roles and responsibilities assigned to each as described in Table 1.

- MoIT
- DAs
- Community Implementing Partners (CIPs)
- Local authorities
- Construction Contractors (CCs).

GM focal points will be appointed at each level. Focal points will lead grievance investigation (as needed) or will convey the investigation to specialized departments , which could include collecting relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, and other activities required to address the grievance. Investigation findings will be used to document the decision-making process and inform the proposed remedy. The GM focal points, particularly those at the community level, will also provide assistance to the claimants who need help during the GM application process to submit their grievances.

This GM manual describes the roles and responsibilities of each grievance intake level in detail to ensure the successful implementation of the GM procedures. MoIT will lead the overall project

³ The list of GM Focal Points, is given in Annex 5, which includes specialist from MoIT/SEECO/DA



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grievance management and reporting, and provide training and support to all other intake levels as necessary.

Table 1 presents the responsible parties and their roles/responsibilities for the GM implementation.

Table 1. Responsible Parties in GM Implementation at Each Defined Level

Responsible Party	Responsibilities
Ministry of Industry Technology and Project Implementation Unit (MoIT/PIU)	<ul style="list-style-type: none"> • Ensures that stakeholders have access to the Project GM and PIU consultants have access to the worker GM. • Overall implementation, management, and coordination of the GM are in line with this Manual. • Train, guide and assist all GM parties to ensure the successful implementation of this GM Manual. • Continuous monitoring of the GM system to ensure that grievances are being managed in line with the procedures described in this GM Manual. • Quarterly grievance reporting to the World Bank and publication of aggregate grievance data on the Project website.
GM Focal Point of the PIU	<ul style="list-style-type: none"> • PIU Social Specialist will act as the GM focal point for the Project • Reviewing, and classifying grievances (eligible and/or related to Project activities) together with relevant member(s) of the PIU, and responding as appropriate. • Establishing the main GM register and monitoring system and following up on all grievances relevant to the Project. • Managing and coordinating the resolution of grievances within the Project. • Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding the stakeholder engagement and other Project activities and coming up with corrective actions. • Recording verbal concerns and grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). • Ensuring that all grievances, including those received verbally, are correctly registered into the MIS. • Submitting the record of the concerns and grievances to the Project Manager. • Coordinating and supporting the GM focal points at other levels. • Consolidating Project-related requests received from different GM levels. • Informing the PIU and the management about the resolution process. • Preparing consolidated GM reports of the Project.



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	<ul style="list-style-type: none"> Coordinating stakeholder engagement activities as specified in Project's Stakeholder Engagement Plan (SEP).
GM Focal Points of the Development Agencies	<ul style="list-style-type: none"> Ensures that stakeholders have access to the Project GM. Receiving project related requests (complaints, compliments, feedback, inquiries for information, etc.). Evaluating and addressing the complaints whichever falls into their area of responsibility. Recording verbal concerns and grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). Then register these grievances into the MIS Submitting the record of the concerns and grievances to the Project Manager. Recording each request whether they are addressed or not on the register and monitoring system through MIS regularly. Immediately notifying the MoIT/PIU of sensitive grievances (when permitted by the claimant in case of SEA/SH complaints).
Local Authorities	<ul style="list-style-type: none"> Receiving project related requests (complaints, compliments, feedback, inquiries for information, etc.). Forward the Project related requests to the related DAs as per mutually agreed procedures Participation in stakeholder engagement activities arranged by DAs and CIPs if necessary.
Environmental and Social (E&S) Specialists of the Community Implementing Partners	<ul style="list-style-type: none"> Ensures that stakeholders have access to the Project GM. Receiving, recording and if applicable, resolving the concerns and grievances. Recording verbal concerns and grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). Then register these grievances into the MIS Submitting the record of concerns and grievances to the Project Manager. Recording resolution of grievances and reporting these to the GM Focal Point of the DA/PIU in their regular progress reports. Immediately notify the DAs if complaints cannot be solved within internal sources (major injuries, sensitive complaints etc.).
Construction Contractor	<ul style="list-style-type: none"> Ensures that stakeholders have access to the Project GM. Receiving, recording and if possible, resolving the concerns and both workers' and stakeholders' grievances. Recording verbal grievances through the: Grievance/Suggestion Form (Annex 3) and the Grievance Closeout Form (Annex 4). Evaluating and addressing the received applications together with the Contractor's E&S specialist/OHS Specialist or if deemed necessary the management of the contractors and the Project Managers will involve



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	<p>in the resolution process of the applications.</p> <ul style="list-style-type: none">• Immediately notify the DAs (then MoIT/PIU) if complaints are sensitive grievances.• Submitting their grievance related documents to DAs monthly to register into MIS.
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7. DISSEMINATION OF INFORMATION REGARDING THE GM

To ensure GM transparency and accessibility, a comprehensive set of communication tools (both Turkish and Arabic) will be in place targeting the Project stakeholders (government staff, public administrations, citizens and Project workers). The communication tools to disseminate information on GM will include the following but not be limited to;

- Informative leaflets, posters
- Official letters, correspondences
- Announcements on notice boards, public places and the official Project' website
- Consultation meetings with project beneficiaries, workers and other stakeholders
- Trainings with beneficiaries, CIPs and CCs

Dedicated communication materials (pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures. In face-to-face meetings, the GM and its details will also be verbally communicated to those who are illiterate. During the implementation of the Project, printed copies of the Grievance/Suggestion Form will also be available in the DAs, CIPs and CCs offices at construction sites and related government authorities and neighborhood representatives (Muhtars). In addition, the Grievance/Suggestion Form for the project is publicly available on the project website⁴ and the webpages of the relevant government institutions included in the Project DAs and municipalities. MoIT/PIU will also conduct biannual GM trainings with representatives of the beneficiaries, CIPs and CCs. Information about the GM, including contact

⁴ <http://sosyalgirisimcilik.gov.tr/> or <https://sosyalgirisim.gov.tr/>



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details, will be distributed in all participating areas at public meetings through brochures/pamphlets in Turkish and Arabic to the extent possible, and posted at relevant project sites such as the Turkish Development Agencies (DA) buildings, Community Implementing Partners (CIP) training venues, beneficiary municipalities building and funded livelihood centers.

8. GRIEVANCE PROCEDURES

There are separate GM procedures for **Project stakeholders** (project affected parties and other interested parties) and for **Project workers** as described under sections 7.1 and 7.2 respectively. Section 7.3 provides information about special considerations for managing sensitive grievances.

7.1. Stakeholder Grievances

The process for grievance management comprises 6 steps: (1) uptake; (2) sort and process; (3) acknowledgement and follow up; (4) verify, investigate and act; (5) response; and (6) feedback and monitoring. These have been described in detail below and summarized in Annex 1: Grievance Mechanism Flowchart.

Figure 1 shows the operational flow of the Grievance Mechanism for project stakeholders.

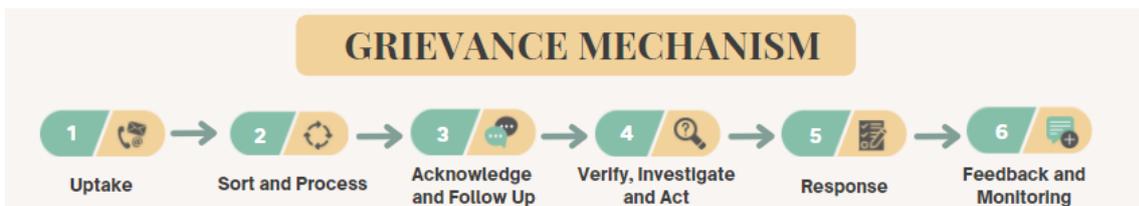


Figure 1. Operational Flow of GRM

Step 1 Uptake: Project stakeholders will have the opportunity to provide feedback and report complaints through several communication channels (in-person, mail, telephone, project website, CİMER/YİMER)) at different levels. Responsible parties for each communication channel are defined below.



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- **In-Person:** DAs, CIPs, Contractors and Related Governmental Offices⁵
- **Project [Email](#) and [Website](#):** PIU, DAs, CIPs GM Team
- **Phone:** PIU, DAs, CIPs GM Team⁶
- **Free Hotline: 0 312 201 66 20** (PIU GM Team)
- **[CIMER](#) and [YIMER](#):** PIU GM Team

Step 2 Sort and Process: Complaints and feedback related to the Project will be documented upon receipt/communication at each level of the GM and will be classified. The importance of documenting all grievances is to make sure problems are accurately understood, conveyed to the related Project unit and handled appropriately. All the Project-related feedback/complaints related to project activities will be logged in the MIS and documented. Until the MIS is established, received grievances will be recorded in a grievance register table which is given in Annex 2. The grievance module of MIS will be developed by mirroring this grievance register table.

Step 3 Acknowledge and Follow-Up: Within 5 days of receiving a complaint/feedback, the grievance mechanism focal point will acknowledge its receipt and inform the external complainants about the estimated response time (15 days) by phone call/e-mail/SMS/WhatsApp according to the complainant's preference.

Step 4 Verification, Investigation and Action: Verification and investigation involve gathering information about the grievance to determine its validity and to generate a clear picture of the circumstances surrounding the issue under consideration. This process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage) and meetings with individuals and/or entities who can assist with resolving the issue. Depending on the channel the grievance is received, the verification and investigation can be conducted by the GM focal point in that organization.

⁵ Metropolitan and district Municipalities, governorships and sub-governorships and provincial directorates.

⁶ Related communication information is shared in Annex 5. The information will be updated.



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Step 5 Response: The GM focal points will provide feedback by contacting the complainant directly within 15 days of receiving the feedback/complaint (using the channel preferred by the claimant). In consideration of confidentiality, the GM focal points will only inform the complainant of the results of the investigations and the actions taken. When an alternative resolution is needed, this period may be extended up to 30 days in which case the claimant will be informed about the extended response period. All responses to complainants are documented and filed.

Step 6 Feedback and Monitoring: This refers to the process of tracking the management of grievances and assessing the extent to which progress is being made to resolve them. Ultimately, the PIU will be responsible for consolidating, monitoring and reporting on the total number of complaints, inquiries and other feedback about the Project that have been received, resolved and that are pending at the community, CCs, DA and MoIT levels. Grievance information collected by CCs, CIPs and DAs will be compiled by the PIU for reporting at the end of every month through the MIS.

The PIU will prepare quarterly reports and submit them to the World Bank team on the implementation of the GM. MoIT will publish aggregated project grievance data on the SEECO website to provide transparency and insights into the workings of the mechanism.

The GM will also allow for **anonymous complaints** to be raised and addressed. As a Project policy, complainant names will be preserved confidential.

7.2. Workers Grievances

The GM for the SEECO project will have separate channels for the submission of complaints/feedback/workplace concerns by Project workers as described in the LMP and SEP documents of the Project. The GM will work together with existing grievance mechanisms available to civil servants at the Ministry level. Civil Servants Code and its relevant regulation provide a grievance procedure for civil servants. According to Article 21 of Law No. 657 (Civil Servants Law); Civil servants have the right to file a complaint and file a lawsuit against their institutions. Appeals and complaints (letter of application, petition etc.) are made by submitting the complaints to the next superior in the hierarchy after the employee's direct superior. Applications and complaints are examined and notified to the relevant party as soon as possible. The complaint must be concluded within 30 days, from the



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date of receipt of the first disciplinary supervisor authorized to decide. Civil Servants who exercise their right to complain cannot be fined for their complaints. The Project workers' grievance mechanism will not prevent workers to use the conciliation procedure (Law on Labor Courts, numbered 7036 published in the Official Gazette dated 25.10.2017- Article 3) provided in Turkish Labor Legislation.

7.2.1 Who can use the Workers' GM

The Grievance Mechanisms for Project Workers will be established within relevant institutions (MoIT, DAs, CIPs and contractors) to allow all **direct** and **contracted workers** to raise workplace related concerns⁷. Under SEECO, the following categories of project workers have been identified in the [Labor Management Plan](#) (LMP):

Direct Workers: In this Project, direct workers are;

- staff from the MoIT (civil servants) that are involved in the project as a part of the PIU
- external consultants for technical issues (e.g. social entrepreneurship, gender, environmental and social issues) that shall be engaged by the MoIT and DAs
- the staff of DAs who will be designated to implement provincial base activities under the sub projects in their area of operation. Development Agencies staff do not have the status of civil servants.⁸ They have a public worker status with an open-ended contract regulated by the Turkish Labor Code 4857.

MoIT staff who will work in the PIU are civil servants. MoIT staff are regulated by the Civil Servant's Act No. 657. For civil servants involved in project operations, regardless of whether they work full time or part time, terms and conditions of their existing contracts or appointments in the public sector shall apply. When engaging external consultants, provisions of national employment legislation shall apply, in parallel with compliance with the requirements of the labor management procedure prepared for

⁷ Detailed information was given in 5 Responsible Parties.

⁸ Law on the establishment and duties of development agencies (Law No. 5449), Article 18: "Services of the Agency shall be carried out by the experts and support personnel employed pursuant to the provisions of Labour Legislation".



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the Project. These consultants may be hired under time-bound contracts, some of them on a part - time basis, with specific definitions of assigned tasks and responsibilities.

Contracted Workers: In this Project, contracted workers are;

- Staff/experts of CIPs contracted by the DAs. These contracted workers will include specialized experts and trainers who have knowledge in working with refugees, women, and who have vast experience in areas such as community engagement, grant management and social cohesion and entrepreneurship. CIP contracted workers will carry out project implementation activities under Components 1 and 2.
- Workers engaged by the civil works construction contractors' companies to carry out the construction, refurbishing and rehabilitation works under the Component 2. It is estimated that the majority of the contracted workers will be unskilled and semi-skilled construction labor.
- Contracted workers also include any potential sub-contractor companies engaged by the construction contractors companies.

7.2.2 Worker Grievance Intake Channels

Intake Channels for Direct Workers:

Consultants (direct workers) and DA employees cannot use the grievance mechanism available to civil servants. Development Agencies Personnel Regulation states that each DA should develop necessary measures for enabling DA personnel's active participation to decision making processes and establish an efficient feedback mechanism to share their views, comments and complaints with their superiors (article 5/1-f).

In case of not having a satisfactory result from internal mechanisms, DA personnel have the right to apply individually to MoIT through the Presidential Communication Center system (CIMER). The Presidential Communication Center can receive requests and complaints either via e-government app, phone, email or through petition. Anonymous grievances can also be submitted. MoIT is obliged to respond to the request within 15 working days.



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The MoIT shall include in the contracts with the consultants the manner in which consultants can raise grievances and complaints in the course of their engagement, in alignment with the DA's employees. Such provisions shall define: the deadline in which a complaint can be lodged, to whom it is to be lodged, and in which timeframe it would be resolved.

Therefore, a Project-level GM for DA employees and consultants will be established to receive grievances via complaint forms, suggestion boxes, email, a phone line etc. The grievances raised by the consultants engaged by MoIT PIU will be received and registered by the GM Focal Point of the PIU, while the grievances raised by DA employees/consultants will be received and registered by the GM Focal Point of the DA. Below are the mechanisms that will be available if a direct worker would like to submit a complaint:

- Mailbox: Mailboxes placed (where confidential submission will be suitable) in the MoIT PIU office and DAs offices⁹ will be available for staff members who want to submit a complaint.
- E-mail: info@seeco.com¹⁰ / DA's email addresses are given in Annex 10
- Website: www.seeco.gov.tr / DA's websites are given in Annex 10
- Official Letter: Kalkınma Ajansları Genel Müdürlüğü SEECO Projesi Şikayet Birimi – Mustafa Kemal Mahallesi Dumlupınar Bulvarı (Eskişehir Yolu 7.km) 2151. Cadde No:154/A 06530 / DA's mailing addresses are given in Annex 10

The details of how the grievances of direct workers will be handled by which responsible party is detailed in Table 2 below.

DAs will monitor the recording and resolution of all grievances including workers', and report these to MoIT in their monthly progress reports. The overall responsibility for the monitoring of worker grievances will be with the GM Focal Point of MoIT.

Intake Channels for Contracted Employees:

Project workers will be informed about the grievance mechanism at the time of hiring via orientations, trainings and/or toolboxes. The GM will be designed to be easily accessible to all Project workers.

⁹ Related contact information of DAs is given in Annex 10

¹⁰ Dedicated email address will be updated.



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Project workers can submit their grievances/feedback on occupational health and safety, terms of employment, payments, conflicts with the local community or co-workers, hygiene, quality of food and/or concerns regarding the security of the workers and other issues related to working conditions and rights. All communications about the grievance mechanism will be written in a language that workers can easily understand. A transparent process will be created for workers to express their concerns and file grievances, including anonymous complaints via dedicated communication channels.

CIPs and Construction Contractors (CCs) will be required to establish a Workers' Grievance Mechanism before mobilization and at the very latest before the commencement of works at site. The grievances of contracted workers at CIPs and CCs will be received and registered by the assigned GM Focal Point and will be handled/managed by the assigned GM Team of the CIP or CC. Below mechanisms will be available if a contracted worker would like to submit a complaint:

- Mailbox: Mailboxes placed (where confidential submission will be suitable) in the CIPs and CCs offices will be available for staff members who want to submit a complaint.
- E-mail: Project e-mail; info@seeco.com (will be updated) / CIPs emails are given in Annex 11 / CC's e-mail; (will be specified later)
- Website: Project website; www.seeco.gov.tr / CIPs websites are given in Annex 11 / CC's website; (will be specified later)
- Official Letter: Kalkınma Ajansları Genel Müdürlüğü SEECO Projesi Şikayet Birimi – Mustafa Kemal Mahallesi Dumlupınar Bulvarı (Eskişehir Yolu 7.km) 2151. Cadde No:154/A 06530 / CIPs mailing addresses are given in Annex 11 / CC's address and contact person will be specified later

7.2.3. Managing Workers' Grievances

This section includes an overview of the roles and responsibilities of the workers' grievance mechanism procedure.



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Grievance/ Suggestion Receiving Level	Description	Intake Person	Assessing Body	SEECO Responsible	Action to Be Taken for Addressing the Grievances	Approval Body	Closure	Action to Be Taken in Case Of Disagreement	Appeal Authorities
CCs Workers	When a contractor's worker issues a complaint	GM Focal Point of CC	Project Manager and/or the GM Focal Point of CC	GM Focal Point of Related DA and/or GM Focal Point of MoIT/PIU	<ul style="list-style-type: none"> The complaint will be directed to the management of the contractor. The project manager of the CC will be immediately informed about the grievance received. If the grievance can be resolved immediately, the Contractor will identify and take necessary actions. If not, the grievance will be escalated to the GM Focal Point of the CIP and/or the PIU for necessary actions to be identified and taken. If the grievance is repetitive, extensive and high-profile that may jeopardize the Project or the reputation of the Bank then the grievance will be escalated to the PIU and necessary actions to be taken will be identified. The response with appropriate solutions and actions to be taken will be prepared and shared with the complainant. 	Project Manager of CC	If the worker is satisfied with the explanation provided and actions are taken, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	<ul style="list-style-type: none"> In case of disagreement, the complaint will be directed to the PIU. PIU will organize a meeting with the worker to further assess potential corrective actions that can be taken and additional information to be provided, as appropriate. If the worker is still dissatisfied with the recommended additional actions or explanation, s/he will be informed about the appeal process. 	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman
CIPs Workers	When a CIP worker issues a complaint	GM Focal Point of CIP	Project Manager and/or the GM Focal Point of CIP	GM Focal Point of Related DA and/or GM	<ul style="list-style-type: none"> If the grievance can be resolved immediately, the Project Manager or the GM Focal Point of the CIP will identify and take necessary actions. If not, the grievance will be escalated to the GM Focal Point of the DA and/or the PIU for necessary actions to be identified and taken. 	Project Manager of CIP	If the worker is satisfied with the explanation provided and actions are taken, the Close-Out Form with corrective actions and explanations	<ul style="list-style-type: none"> Virtual or face-to-face meetings would be conducted with the worker to discuss, propose and agree on any other correction actions. If an agreement is ensured, the proof 	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of



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				Focal Point of MoIT/PIU	<ul style="list-style-type: none"> If the grievance is repetitive, extensive and high-profile that may jeopardize the Project or the reputation of the Bank then the grievance will be escalated to the PIU and necessary actions to be taken will be identified. The response with appropriate solutions and actions to be taken will be prepared and shared with the complainant. 		will be signed by the complainant.	<p>documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the worker.</p> <ul style="list-style-type: none"> If the worker is still dissatisfied with the recommended actions of explanation, s/he will be informed about the appeal process. 	<p>First Instance</p> <ul style="list-style-type: none"> Labor Courts Ombudsman
DAs Workers	When a DA worker issues a complaint	GM Focal Point of related DA	Secretary General of DA and/or the GM Focal Point of DA and PIU	GM Focal Point of DA and PIU	<p>In case an answer/corrective action can be taken immediately; the responsible person will take the required corrective action to resolve the grievance and inform the PIU/MoIT about grievance and the corrective action taken. Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p> <p>If not, the grievance will be escalated to the GM Focal Point of the PIU for necessary actions to be identified and taken.</p>	Focal point of the PIU/MoIT	<p>If the complainant is satisfied with the explanation provided and corrective actions taken, the Close-Out Form including the corrective actions and explanations will be signed by the complainant.</p>	<p>If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoIT for further assessment.</p> <ul style="list-style-type: none"> Site visit would be held to collect more information about the issue/dispute, if appropriate. Virtual or face to face meeting would be conducted with the complainant in order to propose another correction action, if possible. Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. <p><i>If agreement is ensured, the proofing documents for the corrective actions taken</i></p>	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman



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								<p><i>will be collected and attached to the Grievance Close-Out Form to be signed by complainant.</i></p> <p>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</p>	
PIU Workers	When a PIU member issues a complaint	GM Focal Point of Funds and Technical Cooperation Department/MoIT	Director and/or the GM Focal Point of the Funds and Technical Cooperation Department at MoIT	PIU Director	In case an answer/ corrective action can be taken immediately, the responsible person will take the legal action to correct the situation and inform the PIU/MoIT about the action. Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.	PIU Director/MoIT	<p>If the complainant is satisfied with the explanation provided and corrective actions taken, the Close-Out Form including the corrective actions and explanations will be signed by the complainant.</p> <p>If the complaint does not satisfy with the result, s/he will be directed to PIU/MoIT for further assessment</p>	<ul style="list-style-type: none"> Virtual or face to face meeting would be conducted with the worker in order to propose other correction actions if any Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant If the agreement is ensured the proof documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the worker If the complainant does not satisfy with the solution, s/he is informed about the appeal processes 	<ul style="list-style-type: none"> CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman



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Table 2. The Different Stages of Handling Workers' Grievances



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7.3. Mechanism for Addressing SEA/SH Related Grievances

Managing grievances related to sexual exploitation or abuse (SEA), sexual harassment (SH), and other forms of gender-based violence (GBV)¹¹ requires a different approach than other types of concerns raised through project-level grievance mechanisms due to the topic's sensitive nature; the potential for survivors to experience stigma, rejection, or harm; and because of the reluctance of many survivors to come forward and report cases. The specific nature of SEA and SH necessitates tailored measures for the reporting and safe and ethical handling of such allegations through grievance mechanisms.¹² In response to this need, the SEECO project will adapt the Project-level grievance mechanism to allow for the uptake of sensitive grievances with dedicated operating procedures and response protocols for SEA/SH related grievances.

SEA/SH grievances in projects are sensitive due to secondary victimization, repeated trauma, and the risk of retaliation against the survivor or other persons reporting such cases. Therefore, the Project-level grievance mechanism is structured to be sensitive to the needs of SEA/SH survivors. MoIT represented by the SEECO PIU, its contractors, and sub-contractors involved in MoIT projects/operations has a zero-tolerance policy towards acts of SEA against project beneficiaries and affected communities and prohibits SH of project workers.

While handling SEA and SH complaints, the GM will ensure; (i) referral to survivor-support services (health, psychological, legal aid, etc.), based on the consent, needs, and wishes of the survivor; (ii) linkage to the domestic legal system; and (iii) internal inquiry by the MoIT, its contractors and sub-contractors to determine the likelihood that the allegation relates to the SEECO project. When individuals or groups raise these kinds of sensitive issues, the responsible SEECO personnel will ensure that these grievances are filed safely and confidentially in the GM by following the methods defined

¹¹ *Sexual exploitation*: Any real or attempted abuse of a position of vulnerability, power differential, or relationship of confidence for a sexual purpose, including, but not limited to, taking financial, social, or political advantage of another through sexual means.

Sexual abuse: Real or threatened physical intrusion of a sexual nature, whether it be by force or under unequal or coercive conditions.

Sexual harassment: Sexual advances, demand for sexual favors, or any other verbal or physical behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

¹² Interim Technical Note, Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed projects, World Bank, April 2020.



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in the below sections. The SEECO project will ensure that SEA/SH complaints are treated confidentially and that there will be no retaliation against individuals or groups who report such complaints.

The SEA/SH grievance mechanism will function in accordance with the laws of the Republic of Turkey and will provide linkages to the legal system of the country. Cases will be referred to the country's regulatory framework for processing if the consent of the survivor is received. Submitting a SEA/SH complaint shall not prevent the survivor from also pursuing an action in the judicial system. The laws in force in Turkey related to SEA/SH issues are listed below. The general purpose and relevant provisions of these laws will be presented in the GBV Action Plan prepared under the Project.

- Constitution of the Republic of Turkey
- The Civil Code (Law Number:4721, Publication Date: 22/11/2001)
- Labor Law (Law Number:4857, Publication Date: 22/5/2003)
- Turkish Criminal Law (Law Number:5237, Publication Date: 26/9/2004)
- Turkish Code of Obligations (Law Number: 6098, Publication Date: 11/01/2011)
- Law of Protection of Family and Prevention of Violence Against Women (Law Number: 6284, Publication Date: 08/3/2012)

7.3.1. Guiding Principles for Handling SEA/SH Related Grievances

To avoid the possibility of harm, stigma, rejection, or re-traumatization of survivors, the SEA/SH grievance mechanism will apply three key guiding principles; survivor-centric approach, confidentiality, and survivor's safety. These guiding principles are explained below. Staff involved in handling SEA and SH cases will receive initial and continuous training on a survivor-centered approach, adherence to safety and confidentiality principles, and referrals to support services.

Survivor-centric approach: The survivor-centric approach sees the survivor as the main decision-maker for their own lives. The rights, wishes, and choices of the survivor should be at the center of the grievance procedures and decision-making process. According to this approach, the informed consent of the survivor needs to be obtained at all stages of the grievance procedure (from the recording of the allegation to the closure of the case). To ensure a respectful, culturally, and socially sensitive, and non-judgmental approach, GM officers handling cases will be trained on the impacts of SEA/SH on



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survivors, trauma, communication with survivors, service providers, their duties, and relevant legal regulations. Staff supporting SEA/SH-sensitive GM will be responsible for establishing a supportive environment where survivors' rights are protected, and they are treated with dignity and respect.

Confidentiality: Confidentiality is extremely important in handling SEA/SH-related grievances, as survivors of SEA/SH may avoid making a complaint out of fear of being blamed, shamed, or due to fear of retaliation. The grievance mechanism will put in place channels for registering, recording, and handling such cases in an ethical and confidential manner at all stages. Confidentiality procedures such as enabling complainants to report SEA/SH cases without being publicly identified, including anonymous complaints, protecting the information about a SEA/SH allegation -particularly the identity of the survivor or any other individuals reporting such cases- will be applied to the SEA/SH complaints and responsible persons will be trained about these procedures.

Survivor's safety: Survivors of SEA/SH may face retaliation by the perpetrator and/or family members of the perpetrator or be blamed for violence by their family members. Therefore, it is important to evaluate potential risks for the physical and psychological safety of the survivor and to make a safety plan accordingly with the survivor's consent. For this, with the consent of the survivor, the survivor may be referred to the GBV service providers (such as the police, gendarmerie, or ŞÖNİM) as soon as possible for the assessment of potential risks and implementation of necessary measures. If the survivor is a project worker, necessary arrangements shall be made to ensure safety in the working environment or work program in line with the needs and demands of the survivor. These arrangements shall be provided without violating confidentiality and by taking measures/changes related to the perpetrator's work situation rather than the survivors.

7.3.2. Step by Step Procedure for Handling SEA/SH Related Grievances

Step 1 - Submission of Grievances / Intake Channels: Safe and confidential allegation intake channels will operate at all levels (PIU/MoIT, DAs, CIPs, and Contractors) to enable the submission of grievances at all levels whoever the complainant feels more comfortable with. However, the staff involved at the DA, CIP, and Contractor levels will only be responsible for receiving the SEA/SH related grievances, recording the basic necessary information which will then be conveyed to the social specialist/SEA/SH Focal point at the PIU/MoIT for management, and informing the survivor on the mandatory reporting

28



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obligations in Turkey (if applicable to the case), GM operation including the limitations and availability of GBV services. All staff involved in handling SEA/SH grievances at all levels will be trained on SEA/SH issues including the principles of a survivor-centered approach, adherence to safety, and confidentiality.

SEA/SH complaints can be made through the channels of the GM which are described below.

- ✓ Trust phone (call at GSM¹³ line of PIU GM Focal Point, SMS, WhatsApp or confidential e-mail¹⁴) operated by the PIU. A confidential letter can also be sent to the PIU address¹⁵ with a title for the attention of the GM Team.
- ✓ Trusted helplines and/or dedicated e-mail addresses established by CIPs, DAs, and Contractors
- ✓ Face-to-face communication with: (a) social specialist(s) as a /SEA/SH Focal point at the PIU and as SEA/SH Focal Points in each CIPs that regularly visit project implementation work sites and have been trained to receive GBV complaints, assist survivors in accessing needed services and forward the information to the GM with the consent of the survivor; (b) dedicated staff at contractor(s) offices mandated to receive work-related sexual harassment allegations.

Survivors that have been subjected to sexual harassment at the workplace, can in addition report their allegations through their supervisors or other officials in their workplace hierarchy if they feel comfortable and safe doing so. Informal complaints of sexual harassment are also possible if survivors do not wish to formally proceed with the inquiry of an allegation. An unsuccessful attempt to resolve the matter informally does not preclude the complainant from formally reporting the allegation.

All project stakeholders including beneficiaries and project workers will have access to project SEA/SH GM. As the main beneficiaries of the Project are women and youth refugees, the GM process will consider the different socio-cultural contexts and constraints faced by particularly women, girls, boys, and men. *All project workers at different levels (contractor, CIPs, DAs, and MoIT/PIU) will be provided with information* about MoIT's zero-tolerance approach to workplace sexual harassment and abuse, all types of GBV, regulations, prohibited behaviors, service providers, and the process to be followed

¹³ 00 90 536 773 01 47

¹⁴ info@seeco.com (will be updated)

¹⁵ T.C. Sanayi ve Teknoloji Bakanlıđı, Mustafa Kemal Mahallesi Dumlupınar Bulvarı (Eskişehir Yolu 7.km) 2151. Cadde No:154/A 06530 Çankaya/ANKARA



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in case of sexual harassment, exploitation, and abuse. As defined in the Labor Management Procedure (LMP) of the Project, MoIT will develop and implement a Code of Conduct (CoC) that specifies the rules related to SEA/SH issues and penalties for breaches and all project workers (including contracted workers) will be required to sign the CoC prior to the commencement of works. The Contractors will be obliged via bidding documents to adopt a CoC for their workers, and to ensure that all workers are provided with SEA/SH awareness trainings and sign the CoC.

Due to the sensitivity of SEA/SH complaints, the Project will make sure that the staff supporting SEA/SH-sensitive GM at all levels is female and trained on SEA/SH issues. During the intake process, the responsible staff will respect survivors' dignity, rights, wishes, and choices and strictly observe confidentiality at all stages of the process. Staff responsible at all levels for receiving SEA/SH grievances will inform the survivor of the mandatory reporting obligations in Turkey (if applicable to the case), and GM operation including the limitations and availability of GBV services before receiving a complaint from SEA/SH survivor. This will enable the survivor to make an informed choice on launching a formal complaint through the Project GM.

Step 2 - Registration of Complaints: The staff to whom the SEA/SH allegation is disclosed will first acknowledge the receipt of the grievance and provide honest, clear, and complete information about services available from the various agencies that may be able to assist the survivor, as well as details on how to access them. SEA/SH survivors will be informed about all service providers and disciplinary procedures and asked if she/he wants to file a complaint or not. All actions will be taken with the informed consent of the survivor.

The MIS system of the Project will have a separate, password-protected, electronic log where SEA/SH allegations will be recorded, and this log will be maintained by the SEA/SH focal point in the PIU/MoIT. Staff mandated to intake complaints at all levels will have access to this log limited to the registration function and will be responsible for adhering to the confidentiality principle. The social specialist/SEA/SH Focal point at the PIU will be in charge of sorting, processing, and monitoring grievances.



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Responsible staff at all levels will record the complaints in a standardized intake format and obtain consent (see Consent Form in Annex-8) from alleged survivors to process complaints internally and refer survivors to external services. Staff in-taking complaints have no mandate to investigate and further gather evidence/information on possible facts of SEA/SH.

Information collected by the grievance mechanism will be kept to a minimum to protect the confidentiality of the survivor. Staff intaking SEA/SH complaints at all levels will only ask for the following information:

- ✓ The age/sex of the survivor and the alleged perpetrator (if possible),
- ✓ The nature of the allegation-what a survivor says in his or her own words without direct questioning, and
- ✓ If the survivor states that the incident is related to the Project, the services are provided to the survivor and accepted by the survivor.

Additional information shall be gathered by the GBV service providers using their existing survivor support protocols. No questions are asked out of personal curiosity. The responsible staff receiving the complaint cannot question the correctness of the survivor's statement or put forward a condition for the complaint. The staff cannot make any commitments to the survivor or mediate or ignore the complaint. Besides, any words and behaviors that imply that the survivor is lying cannot be made.

The staff registering the complaints to the system is responsible to record what the survivor has described in the complaint form as it is. If the complaint is raised face to face, the staff is responsible for listening to the survivor in a place where privacy is provided, keeping and sending the recorded information in appropriate conditions. In cases where the survivor does not speak Turkish, a professional translator will be provided; the survivor's relative or another person will not be asked for help with translation. For the confidentiality of records, the following actions will be strictly applied:

- SEA/SH complaints are recorded on a separate form and these forms are kept in a locked place.
- A coding system is created for names.



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- Access to the information entered in the system is limited and encrypted.
- Reports are made anonymously.
- Sharing the information of the survivor with an organization can only be done in obligatory cases and with the consent of the survivor.
- It is ensured that the information of not only the survivor but also everyone involved in the complaint is kept confidential.
- Data is kept in encrypted form in a digital environment.
- Users' access to data is restricted.
- Data is protected by backing up.
- Antivirus and security software is used.
- Alphanumeric passwords require periodic changes of passwords.
- Users are trained to ensure data security and confidentiality.
- More information than necessary is not recorded and shared.

The staff to whom the SEA/SH allegation was disclosed will request the consent of the survivor to share some nonidentifiable data with the implementing agency and the World Bank regarding the type of incident, if the alleged perpetrator is associated with the Project, the age and sex of the survivor (if available), and whether the survivor was referred to services. In the absence of consent, there will be absolutely no data sharing, in line with the principle of survivor-centricity.

The survivor's consent will be documented. The survivor can choose to fill out, sign, or fingerprint the consent form (Annex 7) that outlines the survivor's choices regarding whether information about the case is shared with other agencies or individuals and for what purpose.

If a survivor gives consent, the SEA/SH allegation recipient will report the anonymized SEA/SH incident as soon as it becomes known to the MoIT, and then MoIT, in turn, will inform the World Bank. Only the following key pieces of data will be shared: (1) the nature of the allegation; (2) if the alleged perpetrator is, to the survivor's best knowledge, associated with the Project (yes/no); (3) the survivor's age and/or sex (if available); and, (4) if the survivor was referred to services.



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Step 3 - Referral to the Survivor Support Services: All GBV survivors will be informed about support services in an adequate, understandable way and their languages. Emergency needs such as safety and medical care will be considered a priority. The survivor will be allowed to decide for herself whether to receive the support, the type of support, and how and when she wishes to receive it. Staff intaking the complaint will refer the survivor to the specialized GBV service(s) (health, legal, psychosocial, security, and other assistance) with the consent and in accordance with the wishes of the survivor. If the survivor is below 18 years of age, the consent of his/her parents/guardian is required. The list of service providers is presented in Annex 6.

To protect the survivor-centered approach in contexts where SEA/SH allegations may lead to mandatory reporting, information on relevant legislation will be delivered to survivors early on, such as through relevant communication and awareness-raising activities. If the survivor is a child or mentally disabled, it is obligatory by law to report the case to the Provincial Directorate of Family and Social Services without delay. In cases where mandatory notification is required for adults (i.e., in case of sexual assault), the survivor should be informed about it in advance of disclosing any allegations. In cases where reporting is mandatory by Turkish law, it is not part of the SEA/SH GM's competence to conduct investigations, make any announcements, or make judgments about the veracity of an allegation.

Step 4 - Consideration of SEA/SH Cases and Disciplinary Sanctions: If the survivor opts to formally proceed with the complaint, the social specialist/SEA/SH Focal point at the PIU communicates the allegation to the SEA/SH Committee for review and consideration and to determine if the allegation is linked to the Project. The Committee promptly considers the allegation within 5 days of its receipt. If the survivor does not want to proceed with the complaint, she/he is informed about and directed to the service providers (with his/her consent) from which she/he can receive support in various fields, including health and medical services, and psychosocial support, and shelter. Once the survivor is informed and directed to service providers, the social specialist/SEA/SH Focal point at the PIU will close the grievance by just recording the results and will not transfer the case to the Committee.



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If the survivor proceeds with the complaint and the SEA/SH Committee establishes the linkage of the allegation with the Project; the committee will gather with the representatives of the relevant employer and request them to investigate the case and initiate their disciplinary procedures against the perpetrator. MoIT will ensure that the responsible employer takes adequate remedy/disciplinary action against the perpetrator in accordance with the Turkish legislation (including criminal, administrative, and labor law), employment contract, and the code of conduct. Disciplinary actions to take for perpetrators, in line with codes of conduct, may include, depending on the severity of the case (I) informal or formal warnings, (II) additional training, (III) loss of salary, (IV) suspension or termination of employment (with or without payment of salary), (V) report to the police or other authorities as warranted. MoIT will ask Contractors to establish an internal mechanism for investigating such cases and develop a plan to clearly define the roles and responsibilities, procedures to be followed, and disciplinary actions to be taken in handling SEA/SH cases.

Step 5 - Closing SEA/SH Cases and Providing Feedback: Once an action is confirmed and implemented by the relevant parties and the taken action is found appropriate according to the SEA/SH Committee, the case will be closed by the SEA/SH Focal point at PIU/MoIT. In other words, (i) if the survivor has been referred to the relevant GBV service providers, received adequate assistance, and no longer requires support; and (ii) if appropriate actions have been taken against the perpetrator or (iii) if the survivor does not wish to submit an official grievance with the employer, the case will be closed. The SEA/SH focal point at the PIU will record the resolution of the incident, the date it was resolved and mark it as closed. She will track the progress in responding to the allegation reflecting every step in the SEA/SH-GM log (e.g. registration of the case, referrals to service provider organizations, communication with the SEA/SH Committee, etc.) and provide ongoing feedback to the survivor about every step throughout the process. The World Bank will be also notified by MoIT that the case is closed.

The survivor will be informed about the result of the internal investigation of the SEA/SH Committee. Internal disciplinary investigations of SEA/SH complaints should be conducted without harming the survivor, considering the survivor's safety, privacy and needs. When an investigation is concluded, the



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survivor must be informed first to assess her/his safety before the investigation's conclusions are communicated to the perpetrator, particularly when undertaking disciplinary actions are envisioned.

7.3.3. Monitoring and Reporting on SEA/SH Grievance Mechanism

The SEA/SH focal point at PIU/MoIT will compile the data about reported project-related SEA/SH allegations, making sure that it does not contain any information with the potential of being identified, including names and addresses of survivors, their families, or of alleged perpetrators.

The SEA/SH focal point at PIU/MoIT will report the anonymized SEA/SH incident (with the consent of the survivor), within 24 hours of receiving, it to the MoIT/PIU senior management, and they, in turn, inform the World Bank on the allegation. PIU/MoIT will also include SEA/SH-related statistics in reports sent to the WB on a quarterly basis.

While the context surrounding incidents can be communicated to the Bank, no specific details potentially leading to the identification of any of the parties to the complaint should be communicated (e.g. no names, details on incident locations, positions of the parties to the complaints, etc.). The information should be reported to the Bank along four lines:

- the nature of the case,
- if the case is project-related,
- that the survivor has been provided with an understanding of the benefits of available GBV services, according to the established referral procedure and based on each individual's needs and choices been referred to support services;
- how the case is being processed by the accountability and response framework of the contractor and, in due time, the outcomes of that process.

7.3.4. Governance of SEA/SH Grievance Mechanism and Responsibilities

The PIU/MoIT will have overall responsibility for the management of the SEA/SH grievance mechanism as well as the Project's overall grievance mechanism. The PIU/MoIT will ensure that a training program



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will be conducted prior to site-based activities. The training program will be implemented to teach all staff who will be involved in SEA/SH mechanism at different parties such as DAs and CIPs how to handle such allegations, the differences between sexual exploitation and abuse, sexual harassment, and gender-based violence; how to deal with minors versus adults; relevant national and local legal frameworks; how to interact with survivors in an empathetic, nonjudgmental way; the importance of and way to guarantee confidentiality and security; which procedures to follow; what referral pathways exist; how data should be collected; and when and how a case can be considered closed.

The SEA/SH Committee will be established by MoIT and composed of the representatives from PIU/MoIT, with the representatives of the DAs, CIPs or Contractor(s) being invited to participate on a case-by-case base. The MoIT will ensure that there are female representatives on the committee.

As different parties will be involved in the Project implementation and they all will have some responsibilities in handling SEA/SH-related grievances, the roles and responsibilities of each party are defined separately in Table 3 below.

Table 3. Roles and Responsibilities on SEA/SH Grievance Mechanism

<p>SEA/SH Focal point at the PIU/MoIT</p>	<ul style="list-style-type: none"> ✓ intake of all SEA/SH allegations and registration into the GM log ✓ acknowledgement of SEA/SH allegations' receipt and their registration/sorting/processing in the SEA/SH GM log ✓ informing the survivor on the mandatory reporting obligations in Turkey (if applicable to the case), GM operation including the limitations and availability of GBV services ✓ referral of survivors (consent is required) to the service provider organizations ✓ reporting on allegations to the police or gendarmerie if: (i) reporting is obligatory according to the Turkish legislation; (ii) consent of the survivor was obtained ✓ Referral of allegations to the SEA/SH Committee established by the MoIT for determining the relatedness of the allegation(s) to the Project workers.
--	--



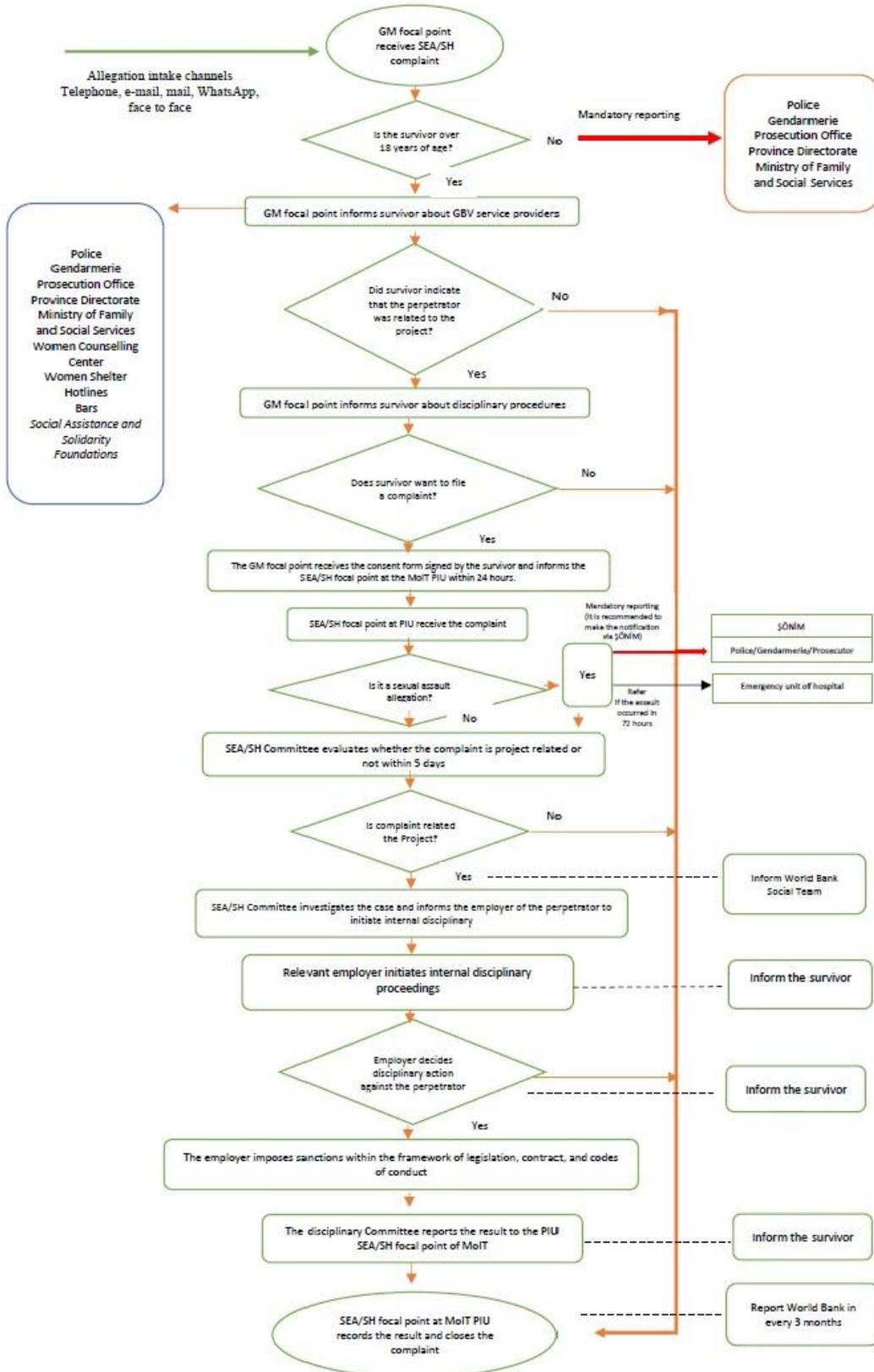
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	<ul style="list-style-type: none"> ✓ Provide feedback to survivors ✓ Notify the World Bank in accordance with the required reporting protocols. ✓ Monitor, track, and provide regular reports
Staff involved at the DA, CIP, and Contractor levels	<ul style="list-style-type: none"> ✓ intake of all SEA/SH allegations and registration into the GM log ✓ acknowledgement of SEA/SH allegations' receipt ✓ informing the survivor on the mandatory reporting obligations in Turkey (if applicable to the case), GM operation including the limitations and availability of GBV services ✓ referral of survivors (consent is required) to the service provider organizations ✓ Provide feedback to survivors
SEA/SH Committee	<ul style="list-style-type: none"> ✓ Review grievances and determine the likelihood that they are project-related. ✓ Confirm and ensure that appropriate sanctions for the perpetrator are implemented in accordance with the employment contract and local law ✓ Report action is taken to SEA/SH Focal point at PIU so that the case can be closed.

The flowchart in Figure 2 below presents the mechanism to be followed in SEA/SH cases along with the responsibilities of project staff defined in each stage.



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Figure 2 Flowchart of SEA/SH Grievance Mechanism

9. APPEAL MECHANISM

If the grievance cannot be resolved despite all the efforts made and actions taken, the GM focal point of PIU will notify the complainant about the resolution by summarizing the corrective actions taken and explaining the resolution process of the complaint and informing the complainant of other alternatives. At all times, complainants may seek other legal remedies in accordance with the Turkish legal framework.

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

- CIMER
- Civil Courts of First Instance
- Administrative Court
- Commercial Courts of First Instance
- Labor Courts
- [Ombudsman](#)

10. WORLD BANK GRIEVANCE REDRESS SERVICE

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



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[service](#). For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

11. MONITORING AND REPORTING

The MoIT GM focal point will be responsible for:

- Collecting and analyzing the qualitative and quantitative data to be obtained from grievance redress focal points on the number, category, substance and status of complaints as well as provision of timely response, proper documentation and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GM mechanisms to the Project Coordinator at the PIU.

Quarterly reports to be submitted by the PIU shall include a section related to GM which provides updated information on the following:

- Status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on the number of received grievances \ (applications, suggestions, complaints, requests, positive feedback), number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
- Level of satisfaction by the measures (response) taken;
- Any correction measures are taken.

Responsible parties regarding GM reporting and requirements for reporting process are provided in Table 4.

Table 4. GM Reporting and Requirements on Reporting Process

Responsible Party	Reporting Process Requirements
-------------------	--------------------------------



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Environmental and Social (E&S) Responsible for the CIPs and CCs	<p>The following list of data related to the management of the received grievances will be provided at each reporting level in their regular reports to be submitted to relevant parties as defined below.</p> <ul style="list-style-type: none"> • Quantitative data on the number of received grievances (applications, suggestions, complaints, requests, positive feedback), and number of resolved grievances, • Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, • Summary of corrective measures taken, • Disaggregated data (gender, province, etc.) about the received grievances. <p>CIPs and CCs will submit monthly reports to the DAs and MoIT/PIU, DAs and PIU GM Focal Point will submit monthly reports to the MoIT/PIU and MoIT PIU will submit reports quarterly and semiannually to the World Bank.</p>
Regional Development Agencies	
The PIU GM Focal Point	
MoIT/PIU	

GM result reports will be posted on the SEECO and DA websites which will be updated quarterly.

10.1. Grievance Monitoring Through MIS

The GM reporting structure (Annex 2) will be reflected in the Project MIS, which is yet to be developed. Once available, the PIU, CIPs, DAs and CCs will record grievances/feedback directly into MIS. Upon grievance receipt, they will classify and transfer to the responsible party if relevant or respond to the claimant and thereafter record the actions taken in MIS to resolve the grievance. PIU will manage the aggregate number of grievance submissions and resolutions by recording this information in a detailed list/report in MIS.



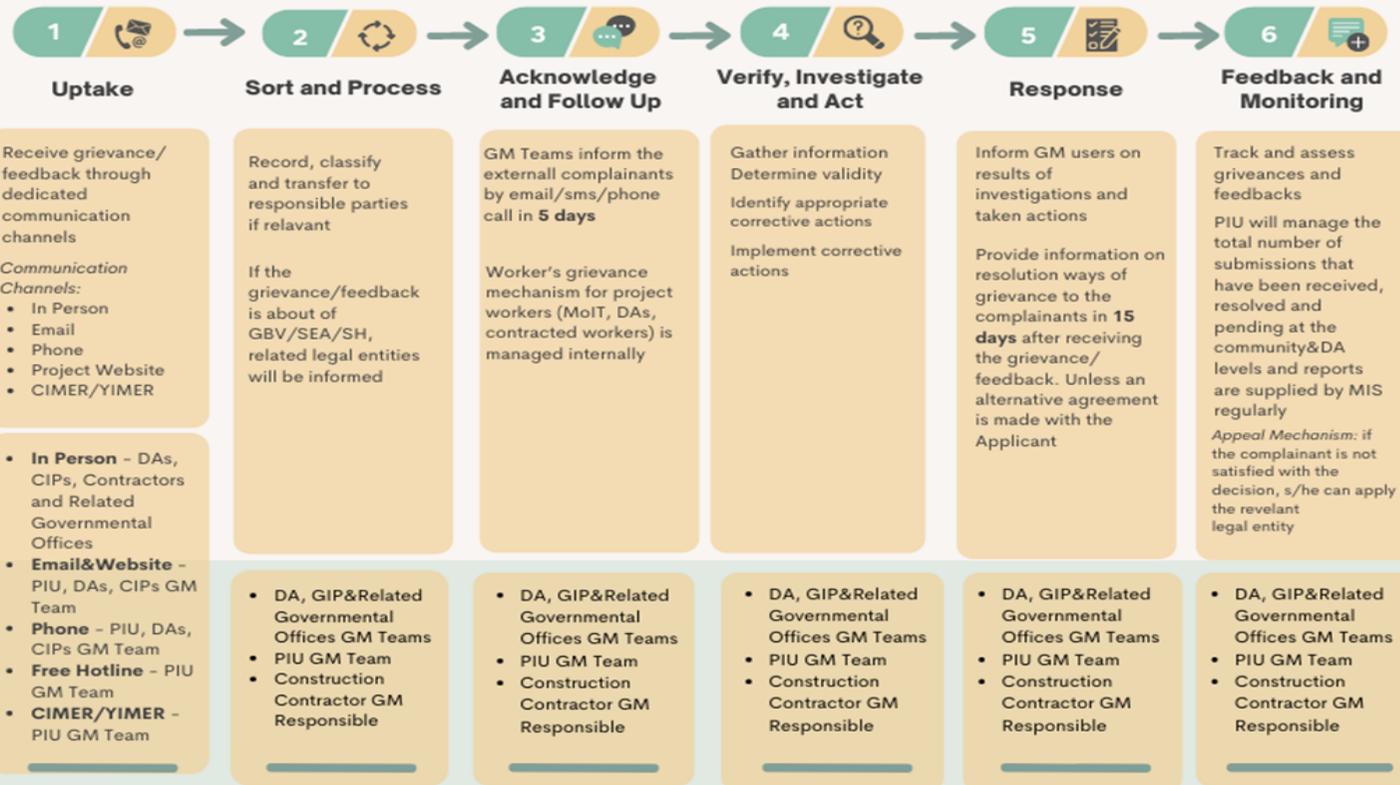
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ANNEX 1 GRIEVANCE MECHANISM FLOWCHART



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GRIEVANCE MECHANISM





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ANNEX 2 GRIEVANCE REGISTER TABLE



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No	Grievance Number	Grievance Type	Explanation	Submission Source	Opening Date	Notification Type	Category	Topic	Project Activity	DA	Location	Name of Complainant	Sex	Age	Citizenship Status	Grievance Type	Grievance Status	Opening Date	Receiver Entity	Receiver Person	Date of Acknowledgment	Grievance Status	Corrective Actions and Comment	Action Taken Date	Closing Date
1		Stakeholder	Example 1		00.00.2022	Grievance	Construction Related	Traffic	Livelihood Facility - Name of the facility	Silkroad	Gaziantep					External	Closed	00.00.2022	PIU	Açelya Duman		Closed	Related Action Were Taken		00.00.2022
2		Workers	Example 2			Request	SGM	Payment	Subgrants - Name	Çukurova	Adana					Internal	Open					Open			
3		SEA/SH															Pending					Pending			
4																	Cancelled					Cancelled			
5																									
6																									
7																									
8																									
9																									
10																									
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ANNEX 3 SAMPLE GRIEVANCE FORM

GRIEVANCE FORM			
Name of person receiving grievance:		Date:	
Title:			
INFORMATION ABOUT COMPLAINANT		Ways of Receiving Grievance	
<i>(This section may not be filled if the complainant wishes to remain anonymous)</i>			
Name – Surname		Phone	<input type="checkbox"/>
Phone number		Information Meetings	<input type="checkbox"/>
Address		Application to Office	<input type="checkbox"/>
District/Neighborhood		Mail/e-mail	<input type="checkbox"/>
Signature (if possible)		Field visit	<input type="checkbox"/>
		Other:	<input type="checkbox"/>
DETAILS OF GRIEVANCE			



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ANNEX 4 SAMPLE GRIEVANCE CLOSEOUT FORM

GRIEVANCE CLOSEOUT FORM		
ASSESSMENT OF THE GRIEVANCE		
Corrective Action Required:	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	Please describe the action if it is required to close out the case	
RESULT		
CLOSEOUT		
<i>This part will be filled in and signed by the complainant and the complaint evaluation committee when the corrective action or file is closed-out. (Instead of taking the signature of the complainant, receipt or other supplementary documents can be attached to the form to verify that the file has been closed-out.)</i>		
Responsible Person	Complainant	



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Name-Surname	Name-Surname
Date and Signature	Date and Signature (If possible)

ANNEX 5 OVERVIEW of GM FOCAL POINTS

N	Name	Title	Mobile Phone	E-Mail	Agency
1	Leventcan Gültekin	Expert	+90 507 993 16 00	leventcan.gultekin@sanayi.gov.tr	MoIT
2	Açelya DUMAN SOYSAL	Expert	+90 507 111 75 20	acelya.dumansoyosal@sanayi.gov.tr	MoIT / PIU
3	Evin Emir	Expert	+90 539 680 59 62	evin.emir@dogaka.gov.tr	East Mediterranean DA
4	Cihan Ardili	Expert	+90 506 381 43 03	cihan.ardili@ika.org.tr	Silkroad DA
5	Armağan TANRIKULU	Expert	+90 505 370 92 92	acelik@karacadağ.gov.tr	Karacadağ DA
6	Pınar DEMİRBOLAT	Expert	90 506 591 45 47	pinar.unzul@cka.org.tr	Çukurova DA
7	Melike Sıla Acar	Expert	+90 534 306 10 76	melike.acar@dika.org.tr	Tigris DA
8	Mehmet Emin Çetin	Expert	0 535 104 94 31	www.weglobal.org	WeGlobal Dicle DA
9	Firdevs Demirkol	Expert	0 (530) 364 51 06	www.viveka.com.tr	Viveka Karacadağ DA
10	Meltem Delibaşlar	Expert	05303021951	www.wyg.com.tr	WYG İpekyolu DA



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ANNEX 6 SERVICE PROVIDERS for SURVIVORS of SEA/SH

SEECO PIU has mapped the organizations providing survivor support services in the provinces where the Project is being carried out and will update this information regularly. Provincial-level contact information of these service providers will be provided in the GBV Action Plan.

Emergency hotlines

All survivors are informed that they can call 155, 156 or 183 in case of a situation that threatens their safety.

Women's Shelters

While more women survivors of domestic violence need it, SEA/SH survivors may also need a safe place to stay because they risk retaliation or are blamed by their families. In this case, the GM operator can direct the survivors to the shelters of the Provincial Directorate of Family and Social Services, municipalities or non-governmental organizations. Shelters are free of charge. Women, girls and boys up to the age of 12 can benefit from these places. Since the addresses of the shelters are confidential, applications can be made to 183, Provincial Directorate of Family and Social Services, ŞÖNİM, and women's counseling centers.

Security

If the survivors want to make a complaint or have a concern about their safety, they are directed to the police stations or gendarmerie stations to carry out a risk assessment and take the necessary measures for the safety of the survivor. Survivors can also apply directly to the prosecution offices to initiate legal proceedings. There are prosecutors specializing in sexual violence in Turkey.

Medical support

In cases of sexual assault that occur within 72 hours, survivors are informed about the practical measures that can be taken to prevent the loss of evidence and to protect them from sexually transmitted infections, and they are directed to a health institution, preferably training and research hospitals, or the emergency service of a well-equipped hospital for a report and medical care and treatment. He should be referred to a hospital if the event has occurred recently, even if 72 hours have passed.

Legal support



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Survivors should be directed to legal aid units of bar associations, Legal Support and Victim Services Directorates, and if any, women's organizations providing legal advice for legal counseling and support.

Counseling

Survivors should be directed to ŞÖNİM or women's counseling center for comprehensive information and counseling.

Psycho-social support

Survivors are directed to ŞÖNİM, women's counseling center, or social service center for psychosocial support.

Economic support

Survivors in need of economic support are directed to Social Assistance and Solidarity Foundations and municipalities.

Complaints about public institutions

Anyone (child or adult) who wants to make a complaint about the actions of public institutions and organizations and the attitudes and behaviors of public officials can apply to the Ombudsman Institution before going to court. Applications to the Ombudsman Institution can be made via 'e-devlet' on the institution's website or by applying to the Governor's Office or District Governor's Office with a petition.



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Alleged Survivor Code		Incident ID	
Remind your client that all information will be kept confidential, and that they may choose not to answer any of the following questions.			
Date		City:	
Staff Name/Code			
Report by alleged survivor	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Details of the complaint			
Was it stated that the complaint is related to the Project?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Project Name			
Sex			
Age			
Did the alleged survivor give consent to share their non-identifiable in your reports?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Checklist			
I recorded the complaint in the alleged survivor's own words	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
I provided information about service providers	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
I provided information about disciplinary processes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
I asked if the survivor wants to file a complaint with the perpetrator's employer	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
I Consent Form for Service Provider and Internal Investigation.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	



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ANNEX 7 COMPLAINT FORM FOR SEA/SH CASES

ANNEX 8 CONSENT FORM for SERVICE PROVIDER & INTERNAL INVESTIGATION

CONFIDENTIAL

Consent for Release of Information

This form should be read to the complainant (if other than the alleged survivor) in her/his first language and clearly explained to her/him that she/he has the right to choose between the given options.

I, _____, give my permission to the Ministry of Industry of Technology of the Republic of Turkey represented by the SEECO Projects Implementation Unit, to share information about the incident I have reported with the victim assistance service provider organization(s) of my choice, so that I can receive help from them for my safety, health, psychosocial, and/or legal needs.

I understand that the shared information will be treated with confidentiality and respect, and that it will be shared only as needed to provide the assistance I request.

At any point, I have the right to change my mind about sharing information with the designated agency / focal point listed below. I would like information released to the following: *(Tick all that apply):*

Yes No

<input type="checkbox"/>	<input type="checkbox"/>	Police: _____
<input type="checkbox"/>	<input type="checkbox"/>	Health/Medical Services (specify)_____
<input type="checkbox"/>	<input type="checkbox"/>	Psychological aid (specify): _____
<input type="checkbox"/>	<input type="checkbox"/>	Shelter (specify):_____
<input type="checkbox"/>	<input type="checkbox"/>	Legal Aid (specify):_____
<input type="checkbox"/>	<input type="checkbox"/>	Other (specify type of service and name of agency):_____



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1. Authorization to be marked by complainant: Yes No
(or parent/guardian if client is under 18)

Furthermore, I give my permission to share information about the incident I have reported with SEECO SEA/SH Committee to determine if the case relates to the Project.

2. Authorization to be marked by complainant: Yes No
(or parent/guardian if client is under 18)

I have been informed and understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify me based on the information that is shared. I understand that shared information will be treated with confidentiality and respect.

3. Authorization to be marked by complainant: Yes No
(or parent/guardian if client is under 18)

Signature of complainant: _____

Name of caregiver if client is minor: _____

Contact Number: _____



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Address: _____

SEA/SH Focal Point Code: _____

Date: _____



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ANNEX 9 SEA/SH GRIEVANCE MECHANISMS: Dos and DON'Ts

Key Guiding Principle	DO	DO NOT!
Safety and Confidentiality	<ul style="list-style-type: none"> - Prioritize the safety and security of the survivor at all stages; - Record SEA/SH complaints in a separate and password protected GM log to ensure the safety and confidentiality of personal data; - Create and apply a coding system to anonymize case files; - Safely store hard copies of SEA/SH complaints, consent forms and information on referrals (e.g. use lockers, store in designated areas); - Restrict access to SEA/SH Log/documents to the selected personnel that has signed the non-disclosure agreement; - Establish a formal protocol to ensure confidentiality with clear rules and procedures for interagency information-sharing of case-level data. 	<ul style="list-style-type: none"> - Ignore the physical security of the survivor (and their vulnerable family members); - Register SEA/SH complaints in the GM Log (manual or electronic) used for other types of grievances; - Make case files easily accessible and searchable by name, date, and place related to an incident; - Include personal information in shared data that could help identify survivors, including names, characteristics, or specific locations.
Respect and non-discrimination	<ul style="list-style-type: none"> - Demonstrate respect towards wishes, choices, rights and dignity of a survivor through all actions you take; - Inform a survivor on her/his rights, complaint handling procedures and available specialized services (including what can't be provided) during the intake of a complaint; - Document a survivor's consent to receive referrals and for the sharing any data; - Adopt a context-sensitive approach for reporting to the police and making referrals to the legal justice system; - Take into account that due to multiple factors some survivors may prefer to turn to the traditional, informal justice mechanisms instead of reporting to the police and approaching the courts for the case resolution; - Assist all survivors without unfair discrimination on the basis of gender, age, disability, race, language, religious or political beliefs, sexual orientation or social class. 	<ul style="list-style-type: none"> - Judge the survivor, neither tell her/him what you think of an incident; - Refer a survivor to the police or specialized services without informing on entitlements and procedures; - Force a survivor to file a formal complaint with the grievance mechanism (some survivors may only wish to access services); - Act on the allegation in any way without the consent of the survivor; - Coerce a survivor to make a particular decision or create false expectations of available services and support; - Differentiate survivors when provide assistance.



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ANNEX 10 THE CONTACT INFORMATION of DEVELOPMENT AGENCIES

No	DA NAME	WEBSITE	EMAIL	ADDRESS	Phone
1	Tigris DA	www.dika.org.tr	info@dika.org.tr	Yenişehir Mahallesi Kızıltepe Caddesi No: 6/1 Artuklu / MARDİN	0 (482) 212 11 14
2	DOĞAKA DA	www.dogaka.gov.tr	bilgi@dogaka.gov.tr	Haraparası Mah. Yavuz Sultan Selim Cad. Birinci Tabakhane Sk. No:20 Antakya / HATAY 31060	(0326) 225 14 15
3	Çukurova DA	www.cka.gov.tr	info@cka.gov.tr	Döşeme Mahallesi Turhan Cemal Beriker Bulvarı No:138/2 01060 Seyhan/ ADANA	(0312) 310 03 00
4	Karacadağ DA	www.karacadag.gov.tr	info@karacadag.gov.tr	Fırat Mahallesi Urfa Bulvarı No:142 Kayapınar/Diyarbakır	(0412) 237 12 16
5	Silkroad DA	www.ika.gov.tr	info@ika.org.tr	İncilipınar Mahallesi Muammer Aksoy Bulvarı Vakıflar Güven İş Merkezi Kat : 1-2-3 Şehitkamil Gaziantep / TÜRKİYE 27060	(0342) 231 07 01



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ANNEX 11 THE CONTACT INFORMATION of CIPs

No	DA-CIP NAME	WEBSITE	EMAIL	ADDRESS	Name and Phone
1	WeGlobal Tigris DA	www.weglobal.org	bilgi.seeco@dika.org.tr sikayet.seeco@dika.org.tr	Ahlatlıbel, Ahlatlıbel Mahallesi Turgut Özal Bulvarı, 1902. Sk. No: 43, 06805 Çankaya/Ankara	Mehmet Emin Çetin 0 535 104 94 31
2	WeGlobal DOĞAKA DA	www.weglobal.org	bilgi.seeco@dogaka.gov.tr sikayet.seeco@dogaka.gov.tr	Ahlatlıbel, Ahlatlıbel Mahallesi Turgut Özal Bulvarı, 1902. Sk. No: 43, 06805 Çankaya/Ankara	+903124479140
3	Çukurova DA				
4	Viveka Karacadağ DA	www.viveka.com.tr	bilgi.seeco@karacadag.gov.tr sikayet.seeco@karacadag.gov.tr	Mustafa Kemal, 2127. Cd No:9/1, 06530 Çankaya/Ankara	Firdevs Demirkol 0 (530) 364 51 06
5	WYG Silkroad DA	www.wyg.com.tr	bilgi.seeco@ika.org.tr sikayet.seeco@ika.org.tr	Mustafa Kemal, WYG Binası, 2128. Sk.	Meltem Delibaşlar 0342 220 00 80 05303021951



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				No:14, 06520 Çankaya/Ankara	
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