



ILBANK

FRIT II– IMPROVING MUNICIPAL SERVICES IN REFUGEE AFFECTED AREAS IN TURKEY (P169996)

STAKEHOLDER ENGAGEMENT FRAMEWORK

JANUARY 2020

INTRODUCTION

The main objective of the Project is to improve municipal infrastructure in municipalities affected by the Syrian refugee influx in Turkey. Its specific objective is to improve access to, and quality of municipal services, including water supply, wastewater and solid waste services in targeted municipalities. Proposed activities to achieve the project objectives will focus on the construction and rehabilitation of water supply infrastructure investments, wastewater systems, and solid waste facilities. It will also include technical assistance for project management, supervision and capacity building to the project implementing agencies at the central and regional level. Envisaged results include: (i) Improved access to safely managed water supply services; (ii) Reduction in non-revenue water; (iii) Improved access to safely managed wastewater collection / sewerage services; (iv) Improved wastewater treatment; (v) Improved solid waste disposal in targeted municipalities; and (vi) Strengthened institutional capacity to manage municipal services in municipalities and utilities.

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

Rationale for a Stakeholder Engagement Framework (SEF)

This Stakeholder Engagement Framework (SEF) forms a part of the Environmental and Social Management Framework (ESMF) of the “Improving Municipal Services in Refugee Affected Areas in Turkey” Project (hereinafter referred to as “the Project”).

This SEF that outlines the engagement approach and methodology that the investing municipalities will adapt for their projects has been prepared by ILBANK as a guiding document during the preparation of sub-project specific SEPs. The SEF provides a framework to support the establishment of a continuous engagement process between municipalities and those who potentially would be impacted, or have any kind of interest in the Project (stakeholders). The process ensures that a sound engagement approach is set in order to increase active participation and involvement of all project stakeholders through a range of activities and tools during the entire life of the Project (design, preconstruction, construction, operation, decommissioning).

Objectives of the SEF

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

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

- To establish a systematic approach to stakeholder engagement that will help municipalities identify stakeholders, and to build and maintain a constructive relationship with all identified stakeholders, especially project-affected parties
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance

- To promote and provide means for effective and inclusive engagement with project affected parties throughout the Project life-cycle on issues that could potentially create an impact
- To ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow municipalities to respond to and manage such grievances

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

STAKEHOLDER ENGAGEMENT PROCESS

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

Stakeholder Identification

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

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

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

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

- Various stakeholder categories that may be ***affected by***, or be ***interested in***, the sub-project;
- Specific individuals (including vulnerable), groups, and organizations within each of these categories taking into account:
 - The area of influence; geographical location where anticipated impacts (both positive and negative) will occur, and therefore the localities within which people and businesses could be affected

- The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues

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

Methods for Stakeholder Engagement

A variety of engagement techniques can be utilized to engage and consult with stakeholders, as well as to gather information from and deliver information to stakeholders.

The level of impact, in addition to the needs and concerns of the stakeholders will found the basis of the tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in Table 1 below. These methods and tools are generic and need to be revised accordingly once the project specific SEPs are prepared.

Table 1. Engagement Methods to be Employed Under the Project

Engagement Method	Application of the Method	Possible Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> - Information sharing (in particular technical) on project requirements and impacts - Invitations to meetings and key events during project implementation - Arrangements for obtaining permits, licences, transfer and allocation of project land - Information and data requests that will be utilized for project implementation 	Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organisations/agencies
One-on-one meetings	<ul style="list-style-type: none"> - Information collection on an individual basis allowing to speak freely about sensitive issues - Establishing personal connections with key actors 	Representatives of relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, contractors and consultants

Engagement Method	Application of the Method	Possible Stakeholder
Formal meetings	<ul style="list-style-type: none"> - Collective information sharing on project requirements and impacts - Receiving comments, feedback, views and perception of project from a group of high level stakeholders - Establishing relations with high level stakeholders 	Other relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, national and local media
Public consultation meetings	<ul style="list-style-type: none"> - Information sharing (especially non-technical) to a large group of stakeholders, especially communities - Receiving comments, feedback, views and perception of project from a group of stakeholders - Collecting grievances and concerns related to the project - Establishing relations with impacted communities, and groups 	Impacted communities and groups, local NGOs, local government, businesses and organisations/agencies
Face to face interviews	<ul style="list-style-type: none"> - Baseline data collection on an individual basis with impacted PAPs - Monitoring of project environmental and social impacts and activities on an individual basis - Establishing relations on an individual basis 	Project affected people, workers
Focus group discussions	<ul style="list-style-type: none"> - Information sharing on a specific topic to a certain group of people including vulnerable groups - Receiving comments, feedback, views and perception of project from a certain group - Collecting grievances and concerns related to the project from a certain group - Monitoring of project environmental and social impacts and activities on a certain group 	Certain target groups, vulnerable groups

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

Timing of Stakeholder Engagement

Timely application of the stakeholder engagement activities that will be conducted during ESIA/ESMP and RP implementation are critical in supporting the Project's risk management process, especially during the early identification and avoidance/management of potential negative and positive impacts that will allow for a cost-effective project design.

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

Project specific SEPs that will be prepared by the municipalities will be expected to present a stakeholder engagement strategy that covers the entire life span of the project, showing the timing and frequency of engagement activities that will be carried out under each project phase.

Institutional Arrangements for Stakeholder Engagement

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

- Preparing and updating the content of the draft SEP (in line with this SEF) and sharing it with ILBANK for final approval
- Assigning dedicated staff for the implementation and monitoring of engagement activities
- Preparing relevant engagement tools and material committed under the project specific SEP and their timely application and/or dissemination
- Approving and facilitating all stakeholder engagement events and disclosure of material to support stakeholder engagement events
- Keeping records of all engagement activities and to monitor and report to ILBANK on a regular basis (through providing inputs on engagement activities in the semiannual progress reports)
- Ensuring that all feedback received from tasks carried out are incorporated in relevant documents and reflected in the decision-making process
- Maintaining the stakeholder database.

Key Principles of Stakeholder Engagement

The SEF and relevant SEPs will ensure that the following key principles are applied to all engagement activities:

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

SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

ILBANK has organized a public consultation meeting to disclose the Project's ESMF (including this SEF) and RF documents on December 6, 2019. Brief summary of the meeting is presented under Section 8 of the ESMF.

GRIEVANCE MECHANISM

A Grievance Redress Mechanism (GRM) will be developed by the municipalities for potential use by both external and internal stakeholders (workers etc.). The aim of the GRM will be to timely resolve any project related grievance that may result in the complainant being worse off due to project activities.

Each borrowing municipality will form a grievance system and assign designated staff for its management. Once the system is established it will be made public and introduced to all stakeholders providing equal and easy access to all. Depending on the magnitude of impact generated by the project and the need of different municipalities; a hotline may be established or contact numbers of responsible officers can be provided to the affected people and communities.

Every grievance received through various means (forms, phone, through staff etc.) employed by the municipality will be recorded to a grievance allowing for timely response and action to be taken by the responsible party assigned for resolution of the grievance. For easy use, two grievance forms; namely Grievance Register Form and Grievance Close Out Form have been provided as annex to this SEF.

Generally, all municipalities adopt a service called “White Table” which aims to collect complaints and requests from the local residents. Although the White Table system is not considered as a grievance mechanism, it is still acknowledged as a general complaint mechanism that is utilized by municipalities. The Project will aim to enhance and improve the current application of the White Table mechanism through project specific arrangements. Any grievance related to a sub-project will be first logged at the municipality level and will be addressed by designated staff within a pre-defined period. There will also be other means of logging grievances such as a toll-free number, online forms, social media channels of the municipalities that have been made available for citizens to submit grievances. If not to the municipalities directly, a complainant can always lodge a grievance through Ilbank’s own GRM also made publicly known and available. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels such as the court of first instance. Table 2 provides a three level GRM system that the Project will adopt.

Table 2. Project GRM

Level	Authority	Method	Procedures	Response Time
1.	Municipality (hotline, White Table, e-mail, online forms etc.)	In person, by phone, by writing, electronically - in all cases grievances will be recorded in a grievance logbook.	Municipality will assign a Community Liaison Officer to lodge and manage grievance and feedback mechanism of the sub-project. Grievance will be assessed. If needed will be examined on-site Response / redress of grievance will be communicated to petitioner.	2 weeks

Level	Authority	Method	Procedures	Response Time
			If cannot be resolved, Level 2 or Court of First Instance depending on grievance.	
2.	ILBANK in Ankara (phone number, address, e-mail)	By phone, by writing, electronically	Lodging of grievance will be confirmed. Grievance will be assessed by the municipality and ILBANK will be informed. Response / redress of grievance will be communicated to petitioner by the municipality. ILBANK will monitor the municipality to run the grievance mechanism smoothly. If cannot be resolved, petitioner will be referred to Court of First Instance.	4 weeks
3.	Responsible Court of First Instance (address)	By writing	Pursuant to legal regime	Pursuant to legal regime

WORLD BANK GRIEVANCE REDRESS SYSTEM

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

MONITORING AND REPORTING

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

Each project specific SEP will include a timeline for engagement activities as well as defining responsible parties for the implementation and monitoring of engagement activities. Monitoring of engagement activities can be realized through identifying key performance indicators that reflect the objectives of the SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase are presented in Table 3.

Table 3. Sample Key Performance Indicators by Project Phase

Project Phase	Indicator	Verification Method
Design and Planning	Preparation of sub project specific SEPs	# of SEPs prepared
	Public consultation meetings carried out to provide Project information and introduce project documents such as ESIA/ESMPs and/or RF/RPs	# of meetings conducted # and type of participants attended
	Designated staff appointed to carry out SEP	Names of staff appointed
	Establishment of Project GRM	Operational GRM
Construction	Raising awareness on Project activities	# of meetings held Decrease in the # of grievances received due to construction
Operation	# of grievances received due to operation	Decrease in the # of grievances received due to operation

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

ANNEX TO SEF**SAMPLE GRIEVANCE AND GRIEVANCE CLOSE OUT FORM****Grievance Form**

Reference No	
Name – Surname <i>The complainant shall hold the right to remain anonymous</i> <i>(Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information)</i>	
Please mark how you wish to be contacted	Please provide details for your preferred communication
E-mail	
Telephone	
Mail	
Other	
Province/Town/Settlement	
Date	
Category of the Grievance	
1. On assets/properties impacted by the project	
2. On infrastructure damages (roads , sewage system or water resources etc)	
3. On decrease or complete loss of sources of income	
4. On environmental issues (ex. pollution)	
5. On employment process	
6. On traffic, transportation and other risks	
7. Other (Please specify):	
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?	

What would you like to see happen to resolve the problem?

Signature:

Date:

Grievance Close Out Form

Grievance closeout number:	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <input type="checkbox"/> NO
CONTROL OF THE REMEDIAL ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	

COMPENSATION AND FINAL STAGES

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

Notes:

Name-Surname and Signature of the Complainant

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

Date..../...../.....

ANNEX 5. STAKEHOLDER CONSULTATION MEETING MINUTES AND ATTENDANCE LIST

QUESTIONS AND ANSWERS:

INSTITUTION	QUESTION/COMMENT	ANSWER
General Directorate of Land Registry and Cadastre	<p>Have the new resettlement locations been determined on the land? If resettlement will take place, the locations should be registered. In this circumstance, expropriation is needed. By considering social impacts, unregistered public land should be identified and registered officially. Public institutions, which are responsible for registration, are General Directorate of National Estate and General Directorate of Land Registry and Cadastre.</p> <p>Predetermination of non-registered public areas/lands or lands which have not yet been surveyed and necessity of registration by virtue of General Directorate of National Estate and General Directorate of Land Registry and Cadastre have been mentioned.</p>	<p>It has been expressed that necessary registration processes are on-going; a considerable part has been completed. Moreover, it has been underlined that these issues will be pursued in “Resettlement Action Plans” by ILBANK.</p> <p>In order to clarify the resettlement issue, the representative of General Directorate of Land Registry and Cadastre has been informed at the end of the meeting that physical displacement has not been foreseen within the scope of this project.</p>
KASKİ	<p>The Expropriation Law in practice allows for majority of the international practices to be applied. Tough there are gaps that need to be bridged, major challenges are centred around the following three requests:</p> <ul style="list-style-type: none"> • Dissatisfaction of PAPs towards compensation fees of land. • PAPs who see expropriation as a last resort • PAPs who object to the value of land. <p>The most challenging problem is reported as illegal occupation of lands. These people have never reported to officials and have gained unfair income.</p>	<p>According to our expropriation legislation, no payment is made to informal users. However, WB requirements suggest paying compensation to locals who earn a livelihood from public land, even for non-legal use. Also, it has been mentioned that this application is not available in Expropriation Law but implemented in the BTC Project by a special law particularly for this project.</p> <p>WB Consultants have expressed that national law had been nearly harmonized with international requirements but there are still gaps to be considered such as compensation measures for informal users. One of the gaps is the replacement cost; while Turkish Law applies depreciation cost for structures, according to the WB ESSs, depreciation is not considered in the calculation of compensations.</p> <p>As municipalities stated that land expropriation payments are even five time</p>

		<p>higher than the real value, WB Consultants have remarked that these prices should be verified and documented in the official documents. The importance of documentation has also been emphasized. Moreover, it has been stated that payments for crops have also been made while assessing the value of land according to Turkish legislation but land to land compensation should also be considered to cash compensation.</p>
Municipalities	<p>Municipalities have remarked that local residents have planted trees and harvested crops in order to enhance price of their lands. In this case, they asked which actions can be taken?</p>	<p>WB Consultants have indicated the validity of "cut-off date" policy. Thus, they mentioned that any process on land will be in valid after this date.</p> <p>Experts of land registry and cadastre have mentioned that there have been some revisions on relevant regulations. However, there is no update on private lands.</p> <p>Moreover, WB Consultants have suggested that one of the solutions to this could be taking of the satellite image of the project area on the cut-off date as an evidence of existing structures on the lands to be expropriated</p>
Kemal Şirikçi KASKİ (Kahramanmaraş)	<p>The language of reports to be prepared was inquired.</p>	<p>It has been stated that the reporting to ILBANK should be in English. On the other hand, it has been mentioned that public announcements/information sharing, and public documents need to be made in Turkish-English-Arabic.</p>

Photos:

