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**TÜRKİYE'DE SOSYAL VE EKONOMİK UYUMU TEŞVİK ETMEK İÇİN
ÖZEL SEKTÖRÜN GÜÇLENDİRİLMESİ**

EMPOWERING THE PRIVATE SECTOR TO FOSTER
SOCIAL AND ECONOMIC COHESION

**STAKEHOLDER ANALYSIS &
STAKEHOLDER ENGAGEMENT PLAN**

March 2022



KFW

Disclaimer

This research was produced with the financial support of the European Union.

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Abbreviations

EU	European Union
ASAM	Association for Solidarity with Asylum Seekers and Migrants
MM	Metropolitan Municipality
BMZ	Federal Ministry for Economic Cooperation and Development
CİMER	Presidency Communication Centre
MoLSS	Ministry of Labor and Social Security
EF	Expertise France
ESS	Environmental and Social Standards
ESSN	Emergency Social Safety Net
FRIT	Facility for Refugees in Türkiye
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
uTP	Under Temporary Protection
SuTP	Syrians Under Temporary Protection
ICMPD	International Center for Migration Policy Development
ILO	International Labour Organization
IMM	Istanbul Metropolitan Municipality
IMEP	Vocational Training Program for Employment
İGAM	Research Centre on Asylum and Migration
KfW	German Development Bank (Kreditanstalt für Wiederaufbau)
KGF	Credit Guarantee Fund
KİGEP	ILO Transition to Formality Programme
SME	Small and Medium-sized Enterprises
KOSGEB	Small and Medium Enterprises Development Organization of Türkiye
LPPD	Law on the Protection of Personal Data
MoNE	Ministry of National Education
MTSO	Mersin Chamber of Commerce and Industry
NACE	Statistical Classification of Economic Activities
PEP	Program for the Promotion of Economic Prospects
PMU	Project Management Unit
SSI	Social Security Institution
NGO	Non-governmental Organization
TESK	Turkish Confederation of Tradesmen and Craftsmen
TOBB	The Union of Chambers and Commodity Exchanges of Türkiye
UNHCR	United Nations High Commissioner for Refugees
UNDP	United Nations Development Programme
3RP	Regional Refugee and Resilience Plan

1. INTRODUCTION

1.1 Brief Information about the Program

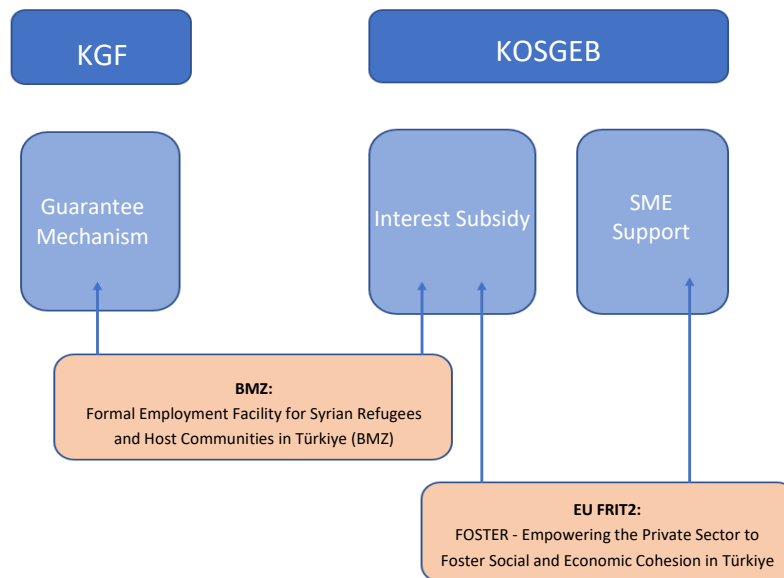
Türkiye has been one of the countries most affected by the intense Syrian influx fleeing the civil war in their homeland. Among the outcomes of the social and economic pressure created by this influx of migration is increasing unemployment and/or informal employment in the provinces affected most by the migration flow. The international community has implemented a series of assistance programs to mitigate the negative effects of the refugee issue. Over the years, such assistance has evolved from humanitarian and monetary support to support for a more sustainable structure through socio-economic integration.

The program, funded by the **German Government** and the **European Union**, was created in this context under the management of the **German Development Bank (KfW)** to empower the private sector and increase their access to finance in order to create or retain employment for Turkish citizens and persons under temporary or international protection. In order to achieve this common goal, the program is divided into two projects, each with its own financing source:

1. Formal Employment Facility for Syrian Refugees and Host Communities in Türkiye (LOT 1) funded by BMZ
2. FOSTER - Empowering the Private Sector to Foster Social and Economic Cohesion in Türkiye (LOT 2) funded by the European Union

The distinction between these activities and their sources of financing is illustrated in Figure 1.

Figure 1: General framework of Lot-1 and Lot-2 projects



Financed by the Federal Ministry for Economic Cooperation and Development (BMZ) with total funding of 10 million Euros, the LOT 1 Project aims to empower SMEs in creating and retaining formal employment for Final Beneficiaries (foreigners under temporary or international protection and Turkish citizens). The project which will be implemented in 20 provinces, is planned to be completed in December 2025.

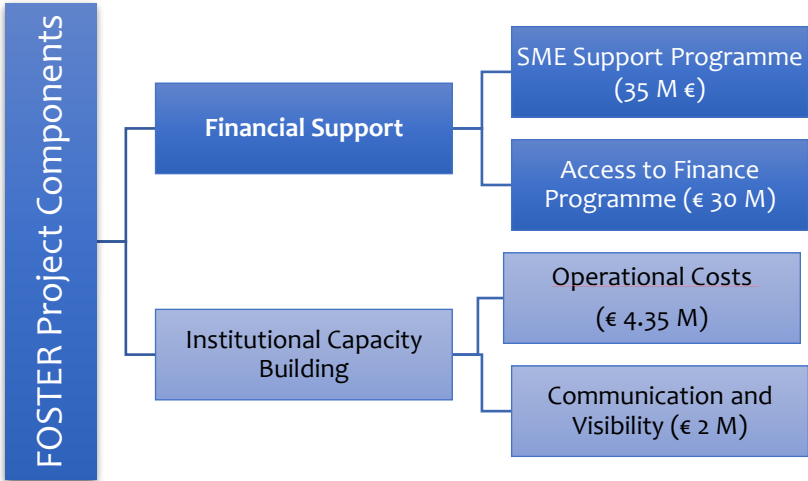
The expected outputs of the Project, which will provide guarantee support of **3.5 million Euros** under **Guarantee Mechanism**, and interest support of **5.6 million Euros** under the **Interest Rate Subsidy**, are as follows:

- At least 950 formal employment positions will be retained or created for Turkish Citizens and persons under temporary and international protection (at least 50% being refugees)
- At least 25% of formal employment positions will be retained or created for women,
- At least 475 businesses will be reached through the Guarantee Mechanism and Interest Rate Subsidy.

LOT 2 Project, which will be carried out in 15 provinces and planned to be completed in November 2024, is financed by the European Union Facility for Refugees in Türkiye 2 (FRIT 2) with a total funding of 71.3 million Euros.

The project has a budget of 30 million Euros for Interest Rate Subsidy and 35 million Euros for SME Support Facility. The remaining amount of 6.3. million will be allocated for capacity building, communication, visibility and other operational costs (Figure 2).

Figure 2: EU-funded Project Support Structure



The projected outputs of LOT-2 are listed as follows:

- At least 5,788 formal employment positions created or retained (at least %50 being ESSN beneficiaries, foreigners under temporary or international protection);
- 200 million Euro worth SME loans disbursed through the support provided by Interest Rate Subsidy Mechanism;

At least 70 million Euro worth investment generated through the support provided by SME Support Mechanism;

- At least 2,197 businesses (1,500 under the Interest Rate Subsidy; 697 under the SME Support Programme) are reached within the scope of the project;
- At least 200 KOSGEB Staff is trained at the end of the project;
- 2,000 beneficiaries who participated to the information meetings that will be conducted at local level;

- %75 of participants attending information meetings assessing them as having improved their awareness for refugees' labour supply;
- 100,000 direct outreach through social media measured via increased use of dedicated media/ social media channels.

In the proposal stage of both projects, the number of provinces and sectors to be supported was limited due to the high number of SuTP population and insufficient fund in comparison to the high unemployment rate. With this approach, the strategy obtained with the constraint approach has the capacity to create the expected impact for the SuTP and Turkish citizens.

Table 1 identifies the provinces determined for LOT 1 and LOT 2 based on the assessment of provinces with dense SuTP populations.

Table 1: Provinces in which the Program will be Implemented

<i>BMZ-Funded Project – Lot 1</i>		<i>EU-Funded Project – Lot 2</i>	
<i>Adana</i>	<i>Kahramanmaraş</i>	<i>Adana</i>	<i>Kayseri</i>
<i>Adıyaman</i>	<i>Kayseri</i>	<i>Ankara</i>	<i>Kilis</i>
<i>Ankara</i>	<i>Kilis</i>	<i>Bursa</i>	<i>Kocaeli</i>
<i>Batman</i>	<i>Kocaeli</i>	<i>Gaziantep</i>	<i>Konya</i>
<i>Bursa</i>	<i>Konya</i>	<i>Hatay</i>	<i>Mardin</i>
<i>Diyarbakır</i>	<i>Malatya</i>	<i>Istanbul</i>	<i>Mersin</i>
<i>Gaziantep</i>	<i>Mardin</i>	<i>Izmir</i>	<i>Şanlıurfa</i>
<i>Hatay</i>	<i>Mersin</i>	<i>Kahramanmaraş</i>	
<i>Istanbul</i>	<i>Osmaniye</i>		
<i>Izmir</i>	<i>Şanlıurfa</i>		

Eligible sectors for support as part of the program are¹:

- A: Manufacturing
- J-61: Telecommunication
- J-62: Computer programming, consultancy and related activities
- J-63: Information service activities
- M-72: Scientific research and development activities
- M-74: Other professional, scientific and technical activities

¹ Statistical Classification of Economic Activities in the European Community (NACE Codes)

1.2 The Need for Stakeholder Analysis and Developing a Stakeholder Engagement Plan

“Labour Market Assessment with a Focus on Turkish Citizens and Syrians under Temporary Protection (SuTP)” report, was compiled at the initial stage to provide input for the design and implementation of the three main support mechanisms of the Program. Mentioned report, which was produced in the last quarter of 2021, includes the current state of the labor market in the project provinces as well as assessments on labor supply and demand. The project provinces (20 and 15 provinces, respectively) were also examined in terms of factors affecting the labour market, and a quick picture of the labour market was taken. Furthermore, information and data regarding the Project stakeholders were obtained throughout the research for the Labour Market Assessment, and it was observed that the stakeholders may provide various contributions to the project. Therefore, the importance of developing a stakeholder map and a database for the implementation of both initiatives was acknowledged during the course of the study.

In addition to this assessment,, the beneficiaries of the program are also required to comply with the World Bank’s Environmental and Social Framework Standards (ESS) according to the project contracts signed between KOSGEB and KfW.. One of the standards in question (ESS 10) is related to stakeholder engagement and the disclosure of information, and it is essential to collect stakeholder opinions, inform stakeholders, receive feedback and interact with stakeholders throughout the project, with focus on the environmental and social impacts of the project activities.

As per the explanations and requirements stated above, it was decided to conduct a stakeholder analysis and to develop a stakeholder engagement plan to manage the project in a more effective way.

1.3 Conceptual Framework of the Stakeholder Analysis

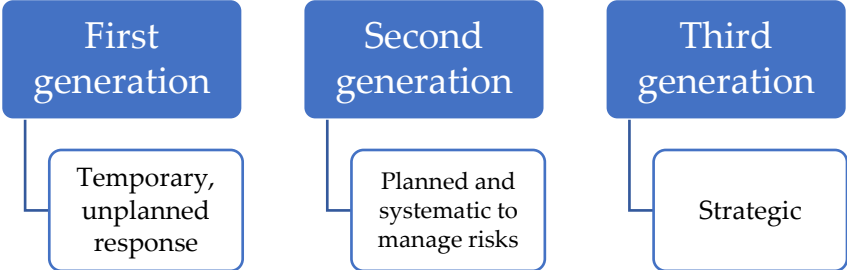
Individuals, groups, or institutions that have an impact on or that are impacted by a project, program, or policy (ppp for short) are referred to as stakeholders. A stakeholder analysis is the study of both stakeholders and the relationships between them and ppp. The information required for a stakeholder analysis can be obtained from primary and secondary sources. Face to face interviews or focus group sessions are among the primary sources where available reports and other resources are defined as secondary.

The concept of the stakeholder subjects discussed in the context of the strategic and operational activities of all small- and large-scale enterprises, businesses, projects, non-governmental organizations and other organizations.

Although stakeholder engagement is not a new concept, it has become increasingly important for the sustainability and success of institutions. In today’s approach, short-term stakeholder relations for immediate problem-solving have evolved into long-term, strategic relations. In this regard, analyzing the economic, social and environmental impacts of projects and programs on stakeholders, eliminating factors that might negatively affect stakeholders, and

involving stakeholders in decision-making processes have become important strategic principles (Figure 3).

Figure 3: Evolution of Stakeholder Engagement over Time



Stakeholder engagement enables stakeholders to have their voices heard and contribute to decision-making processes. It is also important to build trust and reputation regarding the ppp and to manage risks. Through stakeholder engagement, innovative solutions to PPP problems can be developed, and various resources (information, labor, financial assistance, technology, and so on) can be offered to projects. The ultimate goal is to achieve ppp objectives and increase operational efficiency. It is critical to set up mechanisms for informing and receiving/resolving complaints in the stakeholder engagement process, in order to establish a trust-based and transparent relationship between ppp implementors and stakeholders.

In addition to the general standards that have been developed to be applied to stakeholder analysis and engagement, there are also standards developed by international organizations with a focus on environmental and social impact.

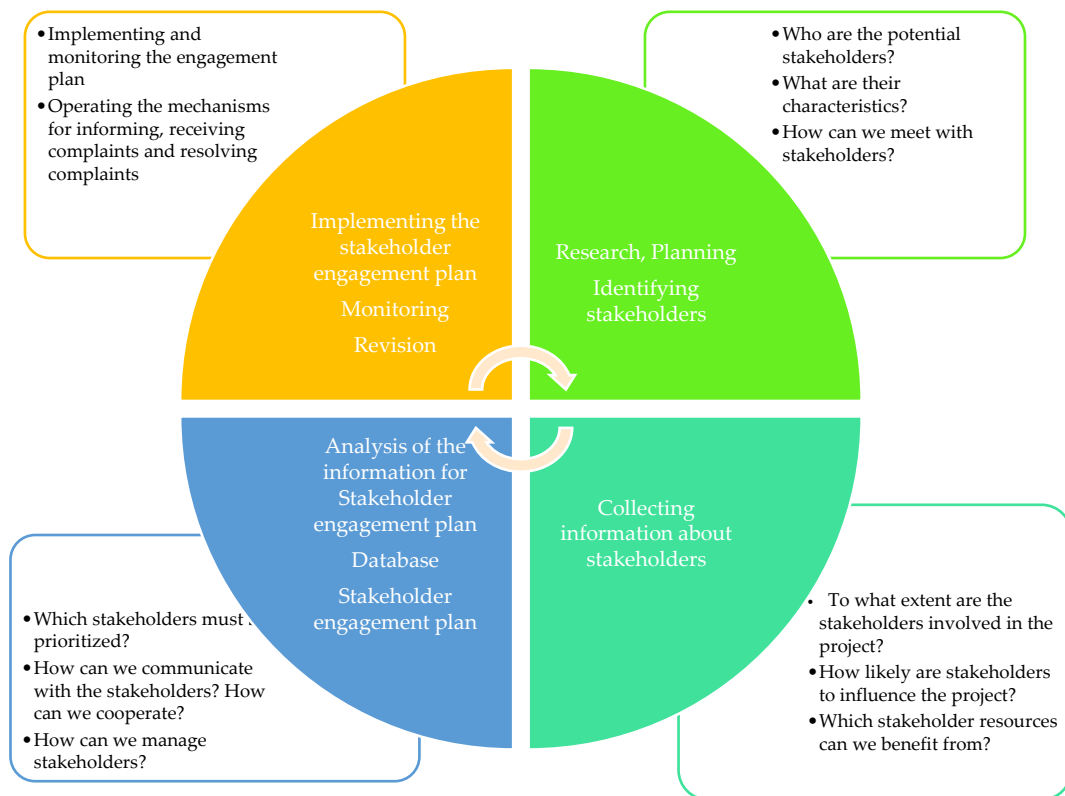
For example, AA10002 is a comprehensive stakeholder engagement standard, under which the stakeholder engagement process is defined as a cycle that includes planning, research and collecting information, analysis, implementation, monitoring and revision. Figure 4 illustrates this process schematically.

While the stakeholder engagement plans defined in the relevant guides of organizations such as World Bank, UNDP and KfW comply with the standard described above, the environmental and social impacts of the investments made using the funding provided by these organizations are highlighted in the stakeholder engagement plan format, and the analysis and planning processes focus on this aspect. The standards developed by some international organizations with focus on environmental and social impact are listed below:

- United Nations Development Programme (UNDP) Social and Environmental Standards (SES) Stakeholder Engagement - 2020
- World Bank: Environmental and Social Framework Stakeholder Engagement and Information Disclosure-2018.

² AA1000 Stakeholder Engagement Standard, AccountAbility 2015

Figure 4: Stakeholder Analysis and Stakeholder Engagement Process



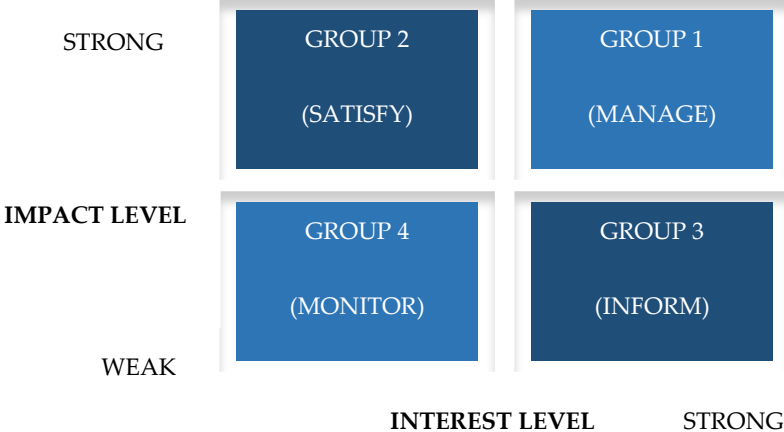
Stakeholder analyses generally focus on finding answers to the following questions, as shown in Figure 4:

- Who are the stakeholders? How are they engaged in the project?
- To what extent are the stakeholders involved in the project? What are their expectations from the project?
- How strong is the impact of the stakeholders on the project? Are there any potential positive/negative effects?
- Which stakeholders must be prioritized?
- How can we interact with stakeholders to increase the quality, feasibility and implementation efficiency of the project design? How can we benefit from their opinions? How can we cooperate?
- Which stakeholder resources can be utilized in the project?
- How can we manage stakeholders effectively?
- How should we communicate with the stakeholders?
- What is the project's potential contribution to each stakeholder in terms of process and outputs? How do these contributions improve the effectiveness of the project?

In the stakeholder analysis, information on the stakeholders is obtained using the above-mentioned questions, and the stakeholders are grouped accordingly. Specific interaction (communication and management) strategies are determined for each stakeholder.

The management strategy can be evaluated in 4 groups, as seen in Figure 5, based on the impact and interest levels of the stakeholders.

Figure 5: Stakeholder Groups and Stakeholder Management Strategies



Informing, receiving information, consulting with stakeholders, utilizing stakeholder resources, negotiating, and collaborating are all examples of communication strategies. Face-to-face and online meetings, focus group meetings, bulletins, social media, and other communication tools can be used to communicate with stakeholders. The frequency of communication may vary according to stakeholder preference and the selected management strategy.

A stakeholder engagement plan that involves all stakeholders includes:

- Individual interaction plans for each stakeholder,
- Mechanisms for informing and receiving complaints,
- Management and resource utilization plans for the stakeholder engagement process, and
- Monitoring and evaluation plans for the stakeholder engagement process.

The next step after the development of a stakeholder engagement plan is its implementation. The engagement plan can be revised according to the needs identified in the implementation process.

2. STAKEHOLDER ANALYSIS OF THE PROGRAM

Stakeholder analyses of the program involve the completion of the planning stage and the finalization of the stakeholder engagement plan. Explanations regarding the analysis and planning processes and the obtained results are provided in the following sections. The stakeholder analysis was carried out by the Project Implementation Consultant Frankfurt

School of Finance and Management under the coordination of the KOSGEB FOSTER Project Coordination Unit.

2.1. Issues that Underpin the Stakeholder Analysis

Prior to starting the stakeholder analysis, key issues with the potential to affect the implementation process of the program and stakeholder decisions, actions and performance were identified. These subjects, which were determined using the results of the labour market research carried out within the scope of the program, and the experiences of KOSGEB and the Implementation Consultant, and that provided the basis for the Stakeholder analysis, are listed below:

SUBJECTS THAT UNDERPIN THE STAKEHOLDER ANALYSIS

- Numerous projects have been carried out in Türkiye for the social and economic integration of refugees. However, since there is no comprehensive map of these projects, no communication or synergy could be established between them.
- The COVID-19 outbreak has adversely affected the supply and demand sides of the labour market.
- Projects funded by international organizations to reduce the social and economic problems caused by migration have mostly focused on the supply side of the labor market, and numerous qualification and skill development programs have been implemented to facilitate the access of both Syrian nationals and Turkish citizens to employment. However, there are few programs that focus on bringing the supply and demand sides together.
- In the project provinces, there is an employment gap in the occupational fields of the Syrian nationals. Businesses, on the other hand, are hesitant to hire Syrian workers because they are under-informed and don't know how to find qualified workers. On the other hand, Syrians lack sufficient information about how and where they can apply for employment.
- It is difficult for businesses (especially SMEs) to keep track of social and economic integration projects due to their daily workload. Even when kept informed, they are unable to develop projects.
- Syrian nationals and Turkish citizens on the supply side of labour have limited access to information resources about projects.
- The fact that SuTP must obtain a work permit is a deterrent for employers as they find the process costly and especially time-consuming.
- The quota on the number of foreign employees (10% of total employees) is also a deterrent.
- Some businesses think that Syrian employees lack the work discipline and that the Syrian labour turnover is significantly high.
- Unregistered employment is very common among Syrian workers.

- It is more difficult for the women and young Syrians to access the labour market compared to other groups.
- SMEs need to increase their awareness of their environmental and social obligations.
- In certain regions, the backlash against refugee communities has adversely affected projects targeting refugees.

The above-mentioned key issues were used as a starting point for gathering information, as well as for the analysis and conclusion stages, which included the evaluation of other issues.

2.2. Methods and Tools Used in the Stakeholder Analysis

Stakeholder analysis and stakeholder engagement studies were carried out under the World Bank ESS10 standard following the process depicted in Figure 6, within the scope of the Program's Environmental and Social Impact commitment. The working stages are described below:

2.2.1. Research, Planning and Identifying Stakeholders

During the research phase, the method for compiling a stakeholder list was developed, and potential stakeholders were identified through secondary sources. Based on the fact that the identified stakeholders were organized both at the central and regional levels, it was decided to conduct the stakeholder analysis at central and regional levels, and then to combine the two studies.

Figure 6: Project Stakeholder Analysis and Stakeholder Engagement Levels



The project stakeholders consist of the following groups:

- Stakeholders directly affected by project activities
 - SMEs
 - Foreign nationals under temporary and international protection, and Turkish citizens
- Other stakeholders involved in the project
 - Public institutions
 - Official institutions
 - Professional organizations
 - Municipalities
 - International organizations
 - Non-Governmental Organizations (NGOs)
 - Research institutions

-
- Vulnerable groups
 - Women
 - Youth

A list of stakeholders to be interviewed at central and regional levels was subsequently prepared. Since it was not possible to conduct one-on-one meetings with the SMEs and final beneficiary groups due to time constraints, interviews were held with institutions/organizations (professional organizations, non-governmental organizations, etc.) representing these groups. Similarly, information on vulnerable groups was obtained by interviewing relevant NGOs. Face-to-face and online interviews with stakeholders were conducted.

In the research and planning phase, methods and forms were developed for the collection of preliminary information and for the grouping of the stakeholders, for in-depth interviews, and for the reporting of the interview results. In this framework, an implementation guide outlining the entire process was developed, and implementation training was provided to the experts involved in the study.

General information on stakeholder analysis and stakeholder engagement

- List of stakeholders
- Preliminary information form template
- Explanations on filling out and evaluating the preliminary information form (determination of impact level and interest score and stakeholder group)
- In-depth interview guide
- Explanations on the stakeholder interaction plan form and database format that are to be prepared following the in-depth interviews
- Organization and time schedule
- Regional level report format

2.2.2. Collecting Stakeholder Information and Developing a Stakeholder Interaction Table and Database

There were two stages to the information gathering procedure. The goal of the first stage was to acquire preliminary information on the stakeholders and assess their level of interest and impact on the project. Another reason for collecting preliminary information was to decide which stakeholders are to be interviewed in depth to ensure the most effective use of time. Stakeholders received the Stakeholder Preliminary Information Form produced for this purpose by e-mail, along with an explanation cover letter.

The answers given to the questions in the preliminary interview form were evaluated by the central Project team and KOSGEB experts in the provinces, the impact level and interest scores were determined for each stakeholder, and stakeholders were grouped according to their scores. The stakeholder groups and interaction strategies that can be applied for those groups were determined using the chart in Figure 5. An assessment was made for each stakeholder

interviewed. Group-1 stakeholders are institutions and organizations with a high level of interest and impact on the project, and that have the potential to collaborate in the process. Group-2 is stakeholders with high impact potential, but low interest. These are institutions and organizations that should be informed and satisfied even if they are not directly involved in the process. The impact and interest levels of Group 3 and Group 4 stakeholders is relatively low.

The second round of the interview began once the stakeholder groups were determined, and in-depth interviews with Group 1 and Group 2 stakeholders were conducted. Additional interviews were also conducted with the stakeholders from other groups. The information gathered during the interviews and from the stakeholder preliminary information form were analyzed, a stakeholder interaction form was created for each stakeholder, and the data was entered into the stakeholder database. The forms related to stakeholder interaction plan and the stakeholder database are presented in Tables 2 and 3, respectively. By integrating the databases of all provinces, a combined database was produced. The data from the preliminary information forms and the engagement plan was analyzed, and the results and evaluations were presented.

2.2.3. Scope of the Stakeholder Analysis Report

The stakeholder analysis report covers the following topics:

- Brief description of the program
- Conceptual framework of the stakeholder analysis
- Methods and tools used in the stakeholder analysis
- Findings of the stakeholder analysis and evaluation
 - Findings from stakeholder preliminary information forms
 - Findings from in-depth interviews
 - Evaluation of the findings
- Stakeholder engagement plan
 - Stakeholder interaction plans and databases at regional level
 - Stakeholder interaction plans and databases at central level
 - Combined database
 - Communication mechanisms
 - General principles
 - Information-sharing strategy and plan
 - Mechanisms for receiving complaints and feedback, and for resolving complaints
 - Management organization, responsibilities, and resources for the implementation of the stakeholder engagement plan
 - Monitoring and evaluation of the stakeholder engagement plan

Table 2: Stakeholder Engagement Plan Form

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder:	Interviewee and his/her role:	Date of the interview:
Project related activities of the stakeholder, and how to access relevant information		
Targeted outcome from stakeholder engagement	<p>Information areas and sharing purposes:</p> <p>Joint event/cooperation areas and possible time schedule:</p> <p>Project outputs to be shared with the stakeholder and the reason for sharing</p> <p>Stakeholder resources to be utilized:</p>	
Preferred interaction method		
Preferred frequency of interaction (regular, as needed, once, etc.)		
The stakeholder is expected to contribute to the project (in what ways?)		
The project is expected to contribute to the stakeholder (in what ways?)		
Other topics discussed		
Project expert Name, surname, signature, date		
Stakeholder representative Name, surname, signature, date		

2.3. Findings from the Stakeholder Analysis and an Evaluation of the Findings

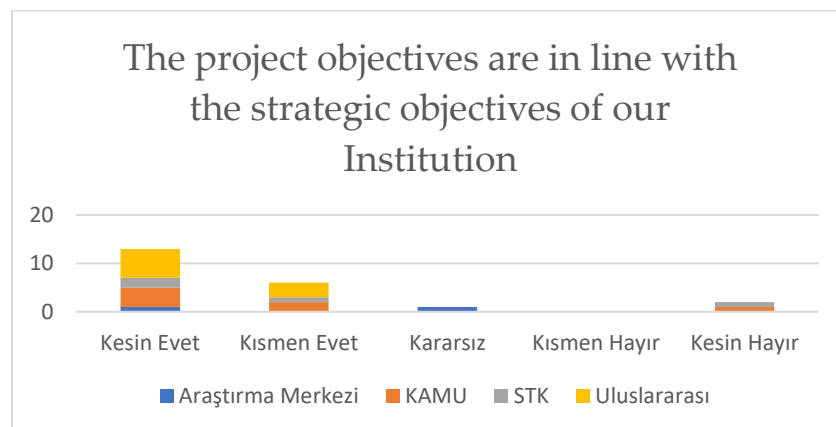
2.3.1. Findings from the Stakeholder Preliminary Information Forms

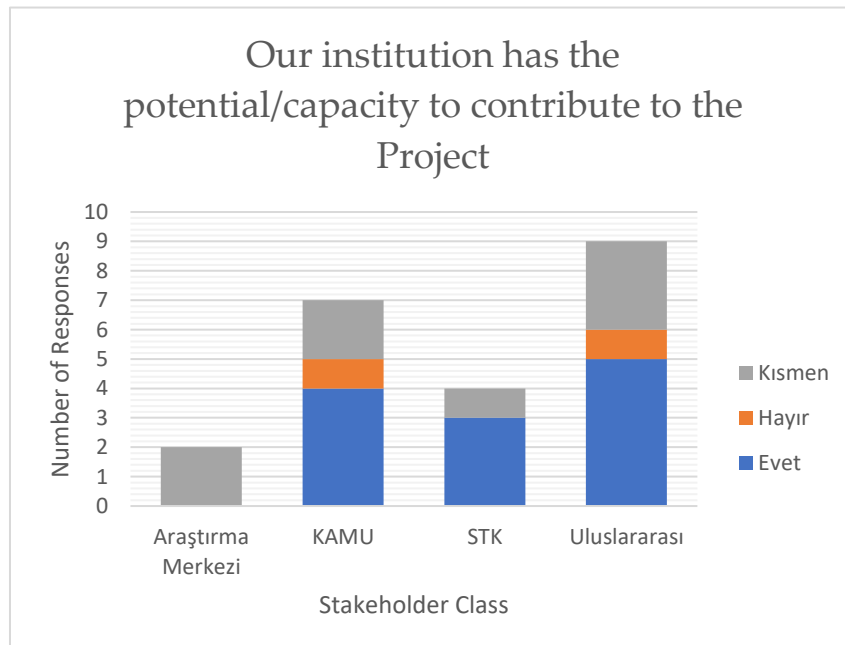
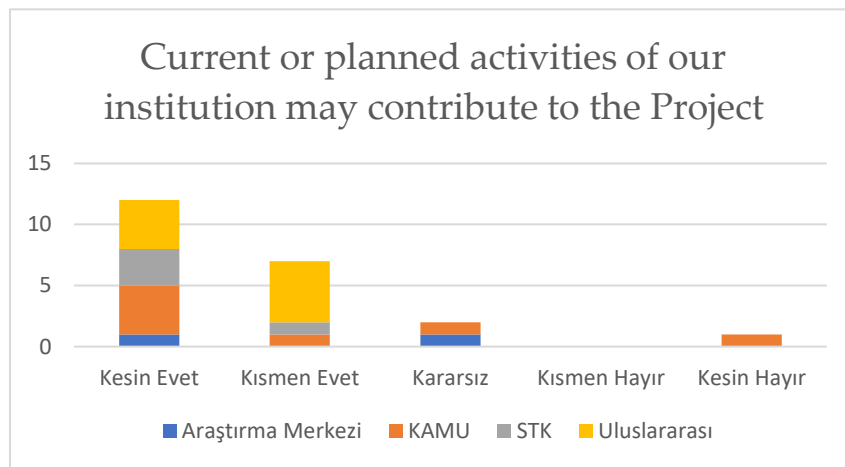
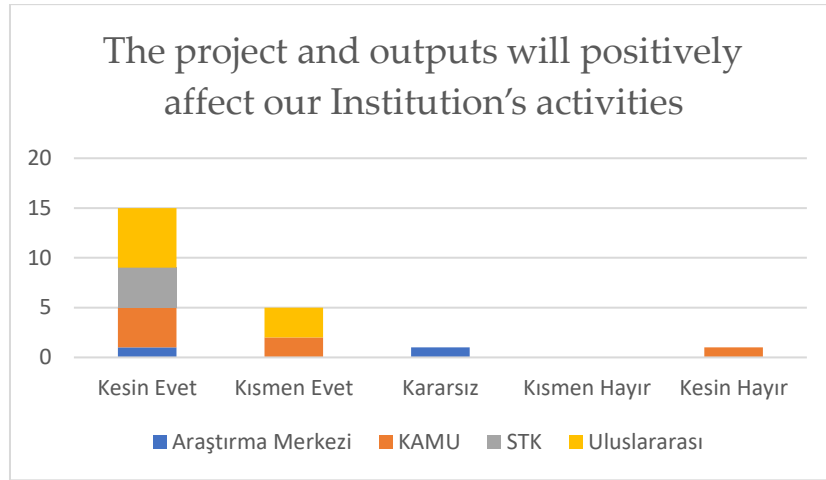
The stakeholder preliminary information forms were developed to determine the general perspectives, impact and interest levels of the stakeholders related to the project. The preliminary information forms were filled out by 21 stakeholders at central level and 69 stakeholders in provinces, All stakeholders were grouped according to their level of impact and interest, based on the information on the preliminary information form (Group 1, Group 2, Group 3, Group 4). The groups to which the stakeholders belong are specified in the stakeholder databases (See. Chapter 3).

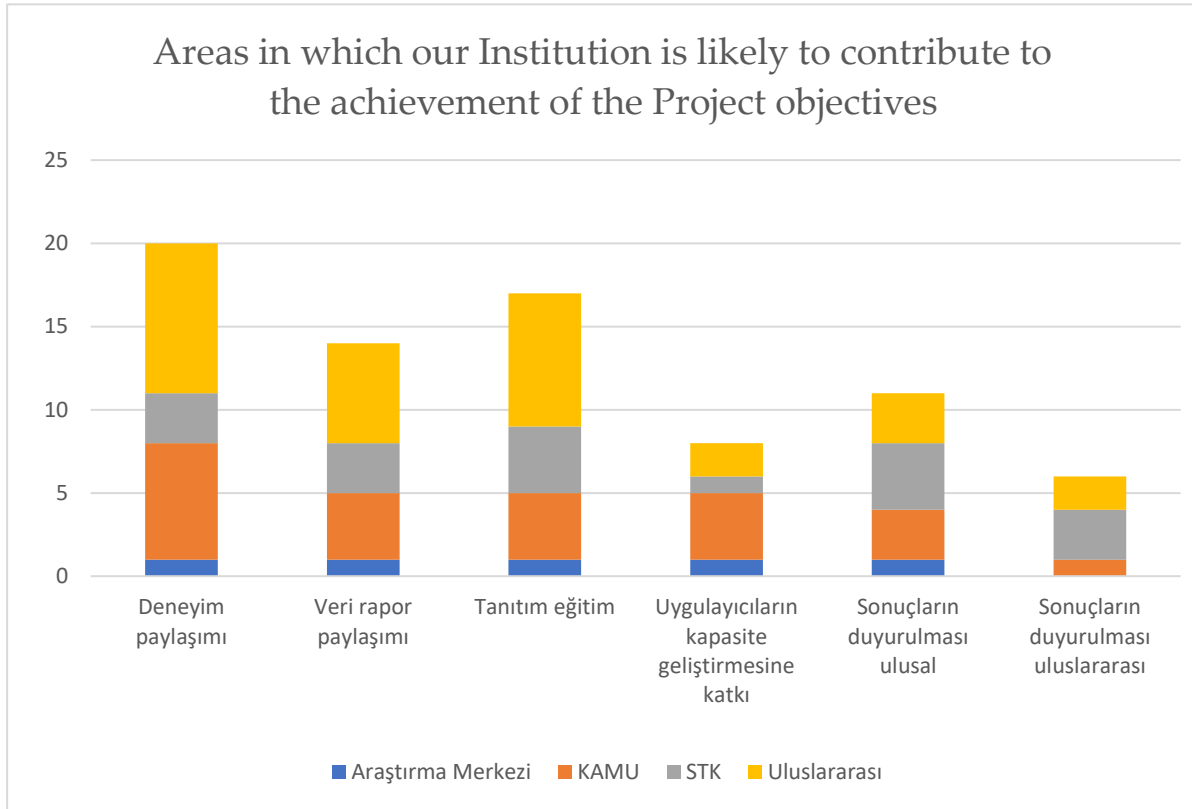
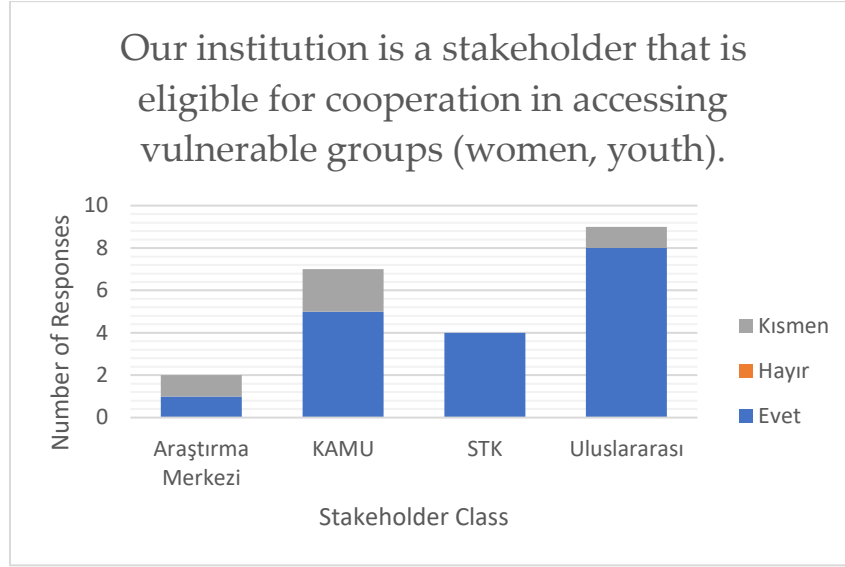
- The responses to the following statements were assessed from the preliminary information forms of 21 stakeholders interviewed at a central level to gain a better understanding of their overall perspective: The project objectives are in line with the strategic objectives of our institution.
- The project and its outputs will positively affect our Institution's activities.
- The current or planned activities of our institution may contribute to the Project.
- Our institution has the potential/capacity to contribute to the Project.
- Our institution is a stakeholder that is appropriate for cooperation in accessing vulnerable groups (women, young people).
- Areas in which our institution can contribute to the achievement of the project objectives include: ...
- The preferences of our institution regarding the level of interaction during the Project are:

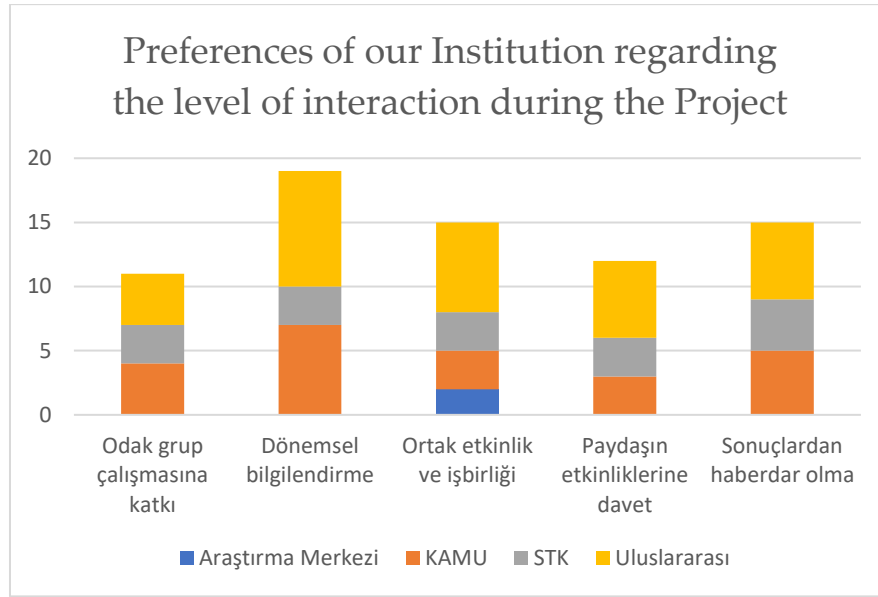
Seven charts showing the analysis results were drawn and presented in Figure 7.

Figure 7: Results of the Preliminary Stakeholder Information Forms Analysis









- The following conclusions can be drawn from the charts: Interviewed stakeholders have strong interest and support capacities.
- Stakeholders are open to data and information sharing.
- Of the 21 stakeholders, 20 (91%) are willing to share their experiences.
- Stakeholders will be able to contribute to the promotion of the Project results at national and international levels.
- Stakeholders want to be informed about the project outcomes.
- Half of the stakeholders wanted to participate in focus group studies and 86% requested periodic information.
- All stakeholders confirmed their availability for cooperation in accessing vulnerable groups.

2.3.2. Findings from in-depth Interviews

In-depth interviews were conducted with 22³ stakeholders in the center and 69 stakeholders in the provinces. Following the in-depth interviews, interaction plans specific to each stakeholder were developed (See. Chapter 3). The general findings of these interviews are summarized under the following titles:

“Which organizations and programs implement activities related to the economic and social integration of SuTPs?”

Organizations and programs that implement activities regarding the economic and social integration of SuTPs can be classified as follows:

- Public Institutions (Official Institutions, Professional Organizations and Municipalities)
- International organizations
- Non-governmental organizations (NGOs)

³ Two separate meetings were held with 2 ILO representatives. The number of stakeholders interviewed is 21.

- Research Centers

The most prominent institutions/organizations classified under these categories in terms of the prevalence and density of their activities are summarized in Table 4.

Table 4: The Organizations and Programs that Implement Activities Related to the Economic and Social Integration of SUTPs

Table	
Category	Institution/Organization
Official institutions	Governorates, central and provincial directorates of migration management, central and provincial directorates of the Ministry of Labour and Social Security, central and provincial directorates of İŞKUR, Development Agencies, TKYB (Development and Investment Bank of Türkiye)
Professional organizations	TOBB, Chambers of Commerce and Industry, MÜSİAD, TÜMSİAD, Chambers and Associations of Tradesmen and Craftsmen
Municipalities	Metropolitan, Provincial and District municipalities
International organizations	UNHCR, ILO, UNDP, World Bank, ICMPD, EF, GIZ, KfW
Non-governmental organizations	Red Crescent, Syria Forum, ASAM, Cooperatives, IMRA, UMHD, DRC, UGDD, İGAM, TEPAV, Refugee Council of Türkiye, SIBA, Syrian Economic Forum
Research institutions	Hacettepe University Migration and Politics Research Center, Migration Research Center at Koç University

- As part of the economic and social integration of SuTPs and the local community, these institutions and organizations established and implemented the following policies, initiatives, and tools: Developing professional skills and competencies for employability,
- Bringing the labour supply and demand sides together,
- Covering the employer's employment costs (including SSI expenses),
- Providing support for start-ups,
- Providing information on work permit procedures,
- Providing support in obtaining work permits,
- Establishing career and employment offices,
- Creating databases,
- Providing information services,

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- Providing entrepreneurship trainings and entrepreneurship grants,
 - Strengthening B2B relationships,
 - Implementing capacity-building programs for SMEs,
 - Research programs on migration and the socio-economic impacts of refugees.

It was observed that these tools include numerous programs and projects on the development of professional skills and competencies. Examples include the Mahir Eller Project implemented by TOBB and the IMEP project by the Ministry of National Education and TESK. In addition, there are projects at the regional level implemented by numerous NGOs. Databases have been created for people who are eligible to work as an outcome of regional and multi-province research. These databases are kept in the records of relevant institutions. The Istanbul Metropolitan Municipality (IMM), for example, is working on a database for Istanbul. Some projects (e.g., Mahir Eller Project) bring together the labor supply (people certified within the scope of the project) and demand sides. In the Mahir Eller project, an incentive of 290 Euros was provided for 6 months to companies employing Syrians who hold a vocational certificate. Despite the existence of several similar programs, it was discovered that in the provinces as a whole, there are few institutionalized supply-demand comparison studies based on active employment policies. The relevant examples include IMM's works to bring employers and job seekers together with İŞKUR through regional employment offices and the employment office activities of Bursa Metropolitan Municipality. Companies were supported in obtaining and extending work permits, as well as paying work permit costs, as part of the Mahir Eller Project and IMM's activities.

There are many programs (Rizk, Ihsan, Bousla, Omran) developed within the Syrian Forum that was established in 2011 to help Syrian nationals rebuild their lives. Within the scope of the Rizk and Bousla programs, services such as vocational training, matching and career counseling are provided with the aim of economic empowerment. The Entrepreneurship Academy, for example, fosters joint innovative ideas of young Syrian and Turkish individuals through the Project "Enhancing Social Cohesion between Refugee and Host Community through Entrepreneurship," which is managed by the Bousla program.

UNHCR has developed a service map that contains information on all humanitarian and government organizations that provide assistance and support to refugees in Türkiye. (<https://Türkiye.servicesadvisor.org/tr>). The map shows 137 support points (organizations, programs, projects and services) related to the livelihood sector⁴ based on provinces and districts. The livelihood sector aims to improve livelihoods and employment opportunities, including creating employment, and providing better and decent working conditions for Syrians under temporary protection, foreigners under international protection, international protection applicants and Turkish citizens. The UNHCR has suggested that KOSGEB represent the FOSTER Project in the UNDP-led livelihood sector working group. The UNDP

⁴ Other areas covered by the Regional Refugee and Resilience Plan (3RP) for which support information is provided include cash transfer, education, food, health, basic needs, protection, legal aid and shelter

reaffirmed their recommendation. UNDP has also announced that they are working on gathering the activities in the livelihood sector under a single roof, and that a workshop will be held in 2022 on this subject.

“What type of collaboration can be formed in order to reach out to target groups, particularly those who are vulnerable? What are the joint activities and other areas of stakeholder collaboration? Which stakeholders’ resources can be used in the project?”

In terms of reaching out to target groups, the majority of stakeholders stated that they are willing to help and cooperate. Some of these stakeholders stated that they can reach SMEs or people who can be employed. In this context, they proposed to provide the following:

- To conduct information meetings or participate to them,
- To promote the project through their websites, social media channels and other facilities,
- To allocate their meeting rooms, seminar halls etc. for outreach and promotion activities,
- To share information from their database in a filtered order,
- To provide support in bringing the supply and demand sides together,
- To provide support in reaching out to vulnerable groups,
- To provide access to SuTP camps.

Although the stakeholders stated that they are ready for cooperation, a common calendar has yet to be determined. It was decided that the events planned to be held jointly will be carried out following the announcement of the grant calls within the scope of the project.

At regional level, some institutions, such as the Adana Chamber of Industry, stated that they can train their own personnel to support SMEs in filing applications, while IMM invited KOSGEB to participate in the meetings to be held as part of the activities of regional offices, and stated that they would share the meeting calendar at their earliest convenience. Ege University stated that they can provide training and consultancy services as necessary throughout the project, and İzmir Provincial Directorate of Migration Management stated that they can provide interpretation services for online meetings. The Adana Chamber of Commerce stated that they can promote the project through the *Incentive Wizard* on their websites. The Konya Chamber of Commerce and Konya Chamber of Industry officials stated that they could hold a joint focus group meeting if necessary. Mardin OIZ will be able to provide support with local newspaper advertisements. The RIZIK Association (Gaziantep) offered to introduce the project to its members. MTSO stated that an information meeting can be organized at the end of the training sessions that are implemented for businesses on weekday evenings.

At central level, Kızılay stated that they could provide data on whether the employed persons are ESSN beneficiaries, and consultancy services on obtaining work permits. Expertise France (EF) expressed that they cannot share data as per the LPPD, but that they can provide guidance regarding the final beneficiaries. UNHCR stated that the project could benefit from the

translation services available in different provinces, while ASAM stated that if an introductory film was made for the Project, they can disseminate it through their own communication network. MoLSS added that they will share documentation explaining all processes related to work permits, and it was decided to produce a joint informative video. In addition, the experts of the General Directorate of the International Labour Force will attend information meetings held at regional level for SMEs and deliver informative presentations on work permits.

Although vulnerable groups are in the focus of all stakeholders, they have different opinions and approaches to the issue. The Hacettepe University Migration Research Center highlighted the importance of providing support to Afghan nationals, whereas ILO stated that young refugees are a more promising group in terms of employment support due to their language skills, educational background and high motivation, however the female employment target of 25% in the Project is not realistic. The General Directorate of Development Agencies added that according to the ENHANCER Project, women who have received a university education are more eager to work and start a business. Some institutions such as Kızılay and İGAM support women's cooperatives. In terms of reaching vulnerable groups, IMM expressed that they can help bring women who have acquired a profession in IMM neighborhood homes, and who are seeking jobs, together with SMEs. It was also noted that in order to enable the participation of vulnerable groups in the project, a trusting environment and the elimination of social and cultural barriers were essential.

“This is a very complex and sensitive subject. Although young people are in the field, they are traditionally against women working, and unfortunately women’s employment is not an issue that can be easily resolved. For example, women attended the trainings organized in partnership with İŞKUR at MTSO, for which daily allowances were given, but their spouses took their allowances, and no subsequent action was taken as regards to their employment.” Mersin Chamber of Commerce and Industry

“On which issues should stakeholders be informed? Which project results should be shared with stakeholders?”

Stakeholders representing SMEs expressed that SMEs have difficulties in interpreting the support legislation and related application documents for various reasons, especially time constraints, and that as they are informed about such matters, they can support SMEs in this regard. Stakeholders representing SMEs stated that SMEs have problems understanding legislation regarding the supports and accompanying application forms for a variety of reasons, including time restrictions. They added that they can better provide support to SMEs once they are informed about these issues. In addition, SMEs consider their professional organizations or the institutions/organizations with which they are in contact as the first address to be informed about project applications. Stakeholders have requested information on the following topics:

- Time schedule of the project calls and application,
- Proposal writing trainings, related information about the content, time schedule and application process,

- Periodic information at all implementation stages of the project,
- Sharing the framework of the project with the stakeholders before the announcement of call (it was noted that it is important to communicate detailed information texts and press releases to the stakeholders so that they can make the necessary announcements quickly when calls are made, and that being informed late will adversely affect the number of project applications),
- Sharing the detailed project implementation calendar,
- Sharing the critical topics and points to be considered in the assessment processes,
- Which businesses can benefit from the project, who can be employed under what conditions?

When asked what project results they would want to see, the stakeholders requested that all data and results shared throughout the project be shared with them as well. The rationale for this request is that they want to know how the project in which they are a stakeholder affects the region, and they need the data to be used statistically for possible future projects. In particular, professional chambers are interested in the project results to observe the SME's potential and the vocational capabilities of foreigners under temporary and international protection in their respective provinces, to be used in their own works. As such, stakeholders requested the following information and data:

- The number of SMEs that are members of professional organizations receiving support,
- The reason for the rejection of applicants (analyzing the reasons for rejection for transparency, and ensuring that the same mistakes are not repeated in similar projects),
- The additional employment created, the retained employment and the new employment,
- Examples of successful applications that would encourage SMEs to apply for similar projects,
- The total number of applications and the number of beneficiaries,
- The distribution of results by provinces,
- Contributions made by the stakeholders (to help observe the effectiveness of the stakeholders and determine the stakeholder's responsibilities for future works),
- Distribution of the applicants and supported enterprises by sector,
- Number of registered SuTP employees in enterprises.

The stakeholders expressed that support application screens should be plain and simple, and that information should be concise and clear. In the briefings, it was noted that it must be emphasized that the mitigation of social problems is related to the reduced unemployment rates.

“What are the stakeholders' views on the environmental and social requirements and grievance mechanism of the Project?”

The stakeholders believe that environmental and social requirements will raise awareness in SMEs and will contribute to the reduction of child labor and unregistered employment. Some stakeholders believe that these requirements are applicable to SMEs (Bursa, İzmir, Kahramanmaraş, Kayseri, Kilis), others believe they may be too heavy (Kocaeli), and yet others think that ensuring compliance with the requirements will take time (Mersin). It was also stated that SMEs should be assisted in their adaptation to the process (Şanlıurfa). It was also added that since there may be revisions during the delivery of project supports towards easing these requirements, they are not worried about this issue at the moment. According to stakeholders, these requirements will raise awareness in the target groups and the community. The stakeholders from Istanbul and Gaziantep did not express an opinion on this issue.

Interviewed at the central level, GIZ expressed that they provide services to SMEs on green transformation within the framework of the PEP Project and that the two projects complement each other. The World Bank, on the other hand, stated that the National Legislation adequately covers the environmental and social requirements, and informed that the implementation of the national legislation had been considered an acceptable criterion in the Category C projects carried out by the World Bank to date. However, they added that technical support should be provided to companies to ensure environmental and social requirements are met, and that there is a need for the employment of environmental and social experts in these companies. EF explained their activities on the prevention of child labour in their IMEP Project.

The Stakeholders stated that the grievance mechanisms in the program are of importance in identifying and eliminating the problems encountered during the implementation phase of the projects and increase their effectiveness. They suggested that the grievance mechanism to be designed as a simple, easily accessible and quick process.

“This mechanism should also cover suggestions, rather than only complaints. These mechanisms must be used effectively to understand the experiences of the people and groups with which the project is concerned”-Bursa MM.

“It would be more appropriate to use feedback, regulatory preventive actions and suggestions rather than complaints. Such a suggestion mechanism should be on a digital platform that is accessible to all. Responding quickly to suggestions and problems will increase stakeholders’ motivation”

“We receive efficient feedback from the Whatsapp notification facility in most municipalities”-

“Transparency, and fair and independent evaluation processes should be ensured, favoritism should not be tolerated”

Stakeholders required that the recorded feedbacks be shared, and that the complaints should only be forwarded to a higher hierarchy/authority for a timely response. When it comes to the grievance process, EF emphasized the risk of SMEs closing themselves off from cooperation and stated that they face similar situations in the IMEP Project.

“What factors must be taken into consideration in order for the project to be successful?”

One of the issues recommended to be considered during the stakeholder meetings is the concern that some SMEs may be in a disadvantaged position within the scope of the Interest

Rate Subsidy, one of the program components. It was noted that it is much more difficult for disadvantaged groups to access finance, and that the project mechanisms should be designed taking this into account. As such, some stakeholders thought that the application conditions and commitments should be flexible and not discouraging, while others consider it is appropriate to implement the project through established corporations.

“This fund, which is easily accessible to SMEs that are already in a good condition in terms of their credibility when evaluated in line with the banking legislation, cannot be accessed by SMEs whose credibility has been adversely affected by the pandemic.”

Similarly, it was suggested that newly established manufacturing companies, as well as the growth of small and new businesses be supported in terms of bank loans rather than companies with strong credit utilization.

“Large companies can be excluded if necessary; only expanding businesses should be supported.”

“The support should be inversely proportional to the number of employees, and business growth should be targeted.”

“The support provided to SMEs must have an impact on the development of the SME.”

Drawing attention to the importance of promotion and access, the stakeholders added that regional governments are highly effective in program promotions, and therefore should be informed in detail about the Project.

Another issue suggested to be considered was the scope of stakeholder engagement. Emphasizing that they expect a vision that includes stakeholders, employees, employers and all policy-implementing institutions and organizations, there are stakeholders which believe that conducting information meetings within this framework is essential for the success of the project.

The importance of the language used in the promotion of the project was also highlighted, and it was emphasized that some enterprises have a negative attitude towards refugee employment.

In addition, it was expressed that it is necessary to monitor companies to see whether they meet the conditions required for support, and whether they retain employment. The Stakeholders suggested that sectoral and regional characteristics also be taken into account.

“The agricultural and tourism sectors should also be included within the scope of support in this project” – UNDP Şanlıurfa

“There were no technology companies in the region for the infrastructure required by KOBİGEL Industry 4.0 support” – Mersin

The other opinions and suggestions of the stakeholders can be summarized as follows:

- The World Bank representative stated that it would be more appropriate to distribute quotas based on a grading of the provinces, and that it is necessary to reach all vulnerable groups and ensure that all businesses have equal access to the support.

- It was suggested that training can be provided to the members of the relevant professional organizations to support SMEs in designing their projects.
- It was considered important that the project cover not only companies that provide new employment, but also companies that are committed to retaining their employment.
- Increasing support for grants and loan interest, reducing the collateral requirement for loan support, extending and facilitating repayment schedules are thought to be beneficial.
- It was emphasized that the bureaucracy should be reduced and the evaluation process should be transparent.
- It was emphasized that due to the ongoing pandemic, many companies were unable to pay their debts (such as SSI and tax debts), and that this should be taken into account.
- The fact that one employee can receive support from several projects, especially in the cases of part-time employment, and that sometimes the actual situation may be different from the formal situation in personnel transfers between enterprises was also highlighted.

“What are the possible risks and challenges in project implementation? What can be done to eliminate such risks and challenges?”

In this section, the evaluations of KOSGEB Project experts and their impressions of the stakeholder interviews are provided.

One of the risk factors in the program is the term “Refugee” in the title of the LOT 1 Project. The fact that the project is focused on refugees may result in a reaction and prejudice among Turkish citizens, as people may think that “Since Syrians are being supported, the unemployment level of Turkish citizens is increasing” (Ankara, Istanbul, Kahramanmaraş, Kayseri, Mersin). A number of suggestions were made to eliminate this risk:

- The wording of the project title could be more general, such as ‘Providing Employment’,
- It should be highlighted that the program will be implemented for long-term employment, and includes both Turkish citizens and SuTP in a way that is different than other programs on similar subjects;
- Messages should be conveyed more clearly through the establishment of face-to-face contact as much as possible within the scope of projects, and so interviews should be preferred over online meetings;
- Information should be delivered on a regular basis and backed up with numerical data, with open lines of communication maintained. It should be emphasized that the project supports are focused on the growth of the enterprises.

The credibility ratings of SMEs that have been adversely affected by the pandemic are considered to be a significant risk. It was suggested that the scope of the KGF guarantee be increased in favor of SMEs in the protocols to be signed with banks.

The limited ability of SMEs in developing projects is also considered a risk factor. The project budget items should provide for the purchase of services for project development. Project experts may also be trained in this regard.

There may be difficulties in reaching SuTPs. It is considered that accessing potential SuTP employees in eligible sectors, (except the manufacturing sectors), may be difficult. Effective matching should be realized between supply and demand side. The project can be promoted through Syrian community leaders. In addition, it will be useful to share information on the SuTPs trained by the stakeholders, or to refer SMEs to these institutions to find the required employees. İŞKUR services may also be utilized.

Language barrier may also be a problem between foreigners under temporary and international protection and Turkish citizens. Potential employees can be directed to institutions that provide basic Turkish Language trainings, or interpretation services can be provided.

The number of rejected enterprises may be high as there is a large target audience, while the budget and the number of targeted beneficiaries is relatively low. The number of applications and the project approval rates can be increased to the desired levels by focusing on businesses with advanced technological facilities that can create added value.

It is thought that the work permits process may create challenges during the project. Lengthy procedures required for obtaining a work permit may discourage an employer to create employment. The relevant stakeholders may be asked for support in this regard. Support can be provided in such a way that the business will have no difficulty in meeting the cost of employment of foreigners under temporary and international protection.

SuTP that are employed tend to change their jobs so often. According to the feedback received from stakeholders in the field, problems such as an inability to adapt to working hours and the cancellation of their work permits for various reasons may cause difficulties in the project. Orientation training can be provided to resolve this problem.

Businesses whose owners or partners are Syrian nationals will not be able to benefit from the support as they do not operate in the manufacturing sector (Şanlıurfa). The tourism and logistics sectors in Şanlıurfa should also be included in the project. As one of the project's key objectives is job creation,, job-intensive sectors and SMEs should be provided more support in order to achieve the employment targets. It must be ensured that businesses in the service sector (food and beverage services, hotel management, etc.) under NACE code 56 in Şanlıurfa also benefit from the project.

To ensure broad participation, required share of the foreign partners in cooperation projects should be kept as low as possible.

“Other findings highlighted by stakeholders”

One of the issues raised in the stakeholder meetings is that the employment of refugees caused a reaction among the Turkish citizens, and that public institutions were hesitant to act on this issue. It is believed that this reservation shown in public institutions is reflected also in the private sector (ICMPD). In fact, this issue is rooted in high incidence of informality in the labour market (ILO). Informality creates unfair competition, which leads to social tension. Nevertheless, Syrians have brought dynamism to the labour market (UNDP).

“The ESSN structure must be updated and positioned differently to encourage refugees to give up the provided ESSN assistance, and to move towards formal employment. Although ESSN assistance discourages the transition to formal employment, formal employment is an encouraging factor both for the families of refugees with a secondary and higher education level, and for their own futures based on their long-term plans in Türkiye” – UNDP

“Contrary to the general perception, research and analyses show that businesses are not concerned whether employees are Turkish or Syrian, as long as they are qualified. They do not hesitate to employ Syrians as long as they can produce quality results” – World Bank

“There is a perception that many citizens have been deprived of work with the arrival of refugees in our country, but this is not strictly true in practice. SMEs take advantage of refugees in the informal sector as cheap labor. As SMEs grow, the need for labor will increase and employment will develop accordingly, creating opportunities for refugees.

The ILO representative mentioned the positive discrimination towards Turkish citizens in the ILO-KİGEP project, and that while it is absolutely necessary to create new employment for Syrians, it is also necessary to retain the existing employment of Turkish citizens.

Based on the experience of FRIT 1, the World Bank representative stated that the KOSGEB Information Management and Decision Support Department could contribute to Project activities, especially in research, monitoring, evaluation and reporting.

The other issue is related to the quota in the employment of foreign nationals. According to the quota, the rate of foreign employees to the total number of employees in an enterprise cannot exceed 10%. MoLSS is working on increasing this quota under various conditions.

“The 10% quota defined in legislation can be stretched at certain times. For example, this quota will not apply to persons who have completed vocational training, and who have worked as an apprentice and then transferred to formal employment within the same enterprise. A study was launched by the General Directorate for International Labour Force in December 2021 involving new principles on work permits. According to the new principles, the 10% quota is being reviewed for cases where the person completes an on-the-job training program and continues to be employed by the employer” – UNDP

2.3.3. Evaluation of the Findings, Suggestions

- An analysis of the preliminary evaluation forms revealed that the majority of stakeholders fall into either Group 1 or Group 2. This indicates that stakeholders with high levels of impact and interest have been included in the analysis. However, it is important not to ignore the Group 3 and Group 4 stakeholders, and to include these groups in interactions throughout the implementation of the stakeholder engagement plan.
- In-depth interviews with stakeholders confirm the results of the analysis of the preliminary information forms. The stakeholders showed a positive approach to cooperation and contribution. This will facilitate the implementation of the stakeholder engagement plan. In this context, it would be appropriate to provide timely information, to keep in touch with stakeholders, and to make action plans at provincial and central levels for the implementation period. When making action plans, collaborations with similar projects can be elaborated. The requirement of some stakeholders to be informed about the call for supports before the call is announced should be taken into account.
- 86 percent of the stakeholders requested periodic information. Periodic bulletins can be issued within the scope of the project and shared with the stakeholders.
- In the meetings held at central level, the stakeholders mostly addressed policy recommendations and prospective issues. Regional level meetings, on the other hand, were focused on operations.
- A significant number of stakeholders mentioned the inadequacy of SMEs in developing projects. Addressing this issue will be beneficial.
- The question “Should we focus on the most disadvantaged groups, or those who have higher education levels and can adapt to socio-economic life more quickly when creating sustainable employment and managing perception in the regions?” is on the agenda of various platforms and scientific research organizations. Sharing the project results will constitute an important resource for such discussions.
- It is important to follow the studies carried out by the Ministry of Labour and Social Security on the 10% quota in order to inform SMEs adequately.
- Attending UNDP’s “Livelihoods Sector” Workshop planned to be organized in 2022 may also be helpful. In this regard, information can be obtained from stakeholders who are interviewed on behalf of the UNDP.
- UNHCR’s translation support proposal can be considered.
- The information brochure on the work permits of the Ministry of Labour and Social Security and the relevant short promotional video (if produced) published on the project website.
- The suggestion that support application screens should be plain and simple should be taken into account.

- GIZ can be contacted for cooperation with their PEP Project. The PEP Project can provide support in the provision of the environmental and social responsibility training given to SMEs in the project.
- When informing SMEs, a stakeholder's view that "SMEs hold back from cooperation when grievance mechanisms are in place" should be taken into consideration.
- To keep track of the sustainability of employment, SMEs can be asked to make a commitment to provide post-project information.
- It is known that 50/50% or 60/40% rates are generally used as refugee-Turkish citizen support indicators in externally funded projects. The example of positive discrimination as regards to Turkish citizens in the KIGEP Project is interesting.
- When establishing the project monitoring system, it is important to note that one employee can receive support from several projects, especially in the case of part-time employment, and sometimes the actual situation may be different from the formal situation in personnel transfers between enterprises.

3. STAKEHOLDER ENGAGEMENT PLAN

3.1. Stakeholder Interaction Plans and Stakeholder Databases at Regional Level

Engaging with stakeholders is an important component of the implementation stage of the stakeholder engagement plan. While the information and grievance mechanisms are applied during the implementation stage, the need for special interactions with the stakeholders remain. This interaction will have various aspects such as stakeholder consultations, collaborations, receiving contributions and sometimes negotiations. The communication and management strategies implemented must be specific to each stakeholder. Accordingly, the stakeholder interaction plans outlined in Table 2 were prepared based on the results of the stakeholder analysis, and stakeholder databases were developed based on these plans. The stakeholder database format is shown in Table 3.

The stakeholder interaction plans are provided in the Project records, and no annexes are added so as not to further complicate the report. Instead, a combined database, in which the databases developed centrally and, in the provinces, as well as the interaction plans, are aggregated. The databases will serve as the basic documentation for the implementation of the stakeholder engagement plan.

3.2. Planned Communication Mechanisms

3.2.1. General Principles to be Adhered to in Communications with Stakeholders

Stakeholder engagement will be based on the following internationally accepted communication principles.

- **Open communication throughout the project:** Throughout the entire project, consultations with stakeholders shall be open, transparent and free of manipulation, interference, pressure or threat.

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- **Informative participation and feedback:** Information about the project shall be presented to all stakeholders in an appropriate format, ensuring that their feedback is received, and stakeholder suggestions and concerns shall be analyzed and considered.
 - **Inclusivity and sensitivity:** All stakeholders shall be encouraged to participate in the implementation process as much as possible, and equal opportunities shall be provided to the stakeholders in accessing information. Stakeholder sensitivities shall be taken into account when selecting communication methods. Special attention shall be paid to vulnerable groups, and the cultural sensitivities of ethnic groups shall be taken into account.
 - **Flexibility:** Online communication tools shall be used when social distancing is required.

Access and interaction methods that are considered appropriate for the relevant stakeholder shall be implemented in consultation, joint decision-making and impact management processes. Online channels (Webex, Zoom, Skype, etc.), social media, mobile applications (Facebook, Twitter, Instagram, Viber, WhatsApp groups, etc.), project websites and web links will be used in addition to face-to-face meetings. Developments within the project will be published on the project website, and various tools such as announcements and promotions, written media, social media, meetings, etc. will be used. The face-to-face meetings held during the analysis stage will continue throughout the implementation of the engagement plan, with the required COVID-19 measures followed in all meetings, ensuring compliance with the relevant legislation⁵. In the event of stakeholders having difficulty in accessing online channels or if they do not prefer such channels, traditional communication channels such as radio, telephone and mail will be used.

The first introduction to the stakeholders was made at the Project kick-off meeting held in Şanlıurfa on February 23, 2022.

3.2.2. Information Sharing (Information) Strategy and Plan

When developing the information strategy and plan, the findings described in Section 2.3 were used. As stated in Section 2.3.2, stakeholders requested disclosure of the following information. This request will be fulfilled throughout the Project.

- Time schedule of project calls (Before the call is announced)
- Issues to be considered in the evaluation of SME Projects
- Project writing trainings, content information, time schedule and application process for the training
- Conditions for benefiting from projects
- All project results that can be shared

⁵ Relevant World Bank guide: Consultation and stakeholder engagement activities with meeting limitations in operations sponsored by the World Bank (March 20, 2020).

- Total number of applications and number of beneficiaries, including the distribution of SuTP-Turkish citizens, gender and age)
- The number of SMEs that are members of professional organizations receiving support
- The number of applicants who did not receive support, as well as the rejected projects and the reasons for rejection
- Retained employment and new employment
- Examples of successful applications
- Distribution of results by provinces and sectors
- Stakeholder contributions

Support application screens will be prepared in a plain and simple manner according to stakeholder opinions. In the information activities, it will be emphasized that social problems are mitigated thanks to the reduced unemployment rate, and cooperation in the dissemination of announcements and promotions will be made with eligible stakeholders, especially municipalities. As it has been noted that some businesses have a negative attitude toward the employment of refugees, the contribution of the project to SMEs will be highlighted through messages given through project promotion and announcement activities.

Stakeholders will be regularly informed of project developments, including information on the environmental and social performance of the project. Stakeholder meeting minutes and reports, as well as feedback from any interactions, will be shared with them.

Vulnerable groups will be given opportunities to express their opinions. They will have the same opportunities to access information, feedback and grievance mechanisms as other stakeholders. Accordingly, continuous communication will be ensured with the relevant NGOs, and one-on-one meetings will be held at the regional level as necessary. Turkish and Arabic language information documents will be prepared and shared on the project website for vulnerable groups, including women, youth and those on a low income. Information strategies for vulnerable groups will be modified according to the needs that arise during the implementation of the project.

Table 5 shows the information-sharing plan that was developed with stakeholder expectations in consideration. The KOSGEB FOSTER Project Management Unit (PMU) is responsible for the implementation of this plan. Accordingly, all project documents will be shared in Turkish and English on the current Project website ([http:// www.fostersmes.com](http://www.fostersmes.com)). The procedure for receiving complaints and environmental and social monitoring reports will also be published on the above-mentioned website, where the electronic complaint form can be accessed. Printed complaint forms can be obtained from the KOSGEB Presidency and from provincial directorates. The website will be updated regularly.

Table 5: Information Sharing Strategy

Project stage	Information subject	Information tools	Target stakeholders
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Inception	Purpose, objectives, and scope of the project	Launch Event (February 23, 2022)	Public and NGO representatives invited to the meeting
Before the support call	Scope of the call, eligibility criteria and points to be considered, time schedule	Face-to-face information at regional level	Organizations representing SMEs and vulnerable groups
Call	Scope of the call, eligibility criteria, application conditions, relevant forms	KBS, website	SMEs, job-seeking SuTP and Turkish citizens, SuTP community leaders and relevant organizations, stakeholders working on labor supply and with job seeker inventories
After the evaluation of applications for the project	Total number of applications, acceptances and rejections	KBS, website	Applying SMEs and organizations representing SMEs
After the evaluation of applications for the project	Reasons for rejection	KBS, e-mail	Relevant SME
Throughout the implementation of the project	-Retained employment and new employment -Examples of successful applications -Distribution of results by provinces and sectors -Contributions made by stakeholders	Website	All stakeholders
Throughout the implementation of the project	Stakeholder engagement plans	Direct communication, e-mail	Relevant stakeholders
Throughout the implementation of the project (As specified in Section 3.3.3)	Grievance Mechanism	Website	All stakeholders
After monitoring	Success stories	Website Social media	All stakeholders

Throughout the implementation of the project	Meetings and consultations with stakeholders, minutes and reports concerning information collection	E-mail	Relevant stakeholders
Throughout the implementation of the project	Environmental and social monitoring reports (for SMEs)	Correspondence, e-mail	Relevant SMEs
Throughout the implementation of the project	Environmental and social monitoring reports of the project (general)	Website	All stakeholders
Throughout the implementation of the project	Recorded grievances and feedback	Website	Relevant stakeholders
Throughout the implementation of the project	Progress Reports	Electronic and written format	KfW
Throughout the implementation of the project	Grievance reports (3-month periods)	Electronic and written format	KfW
Throughout the implementation of the project	Summary progress reports	Website	All stakeholders

The information subjects, target stakeholders and information tools in Table 5 may be improved and updated as needed.

3.2.3. Mechanisms for Receiving Grievances and Feedback, and for Resolving Complaints⁶

For the development of the grievance and feedback strategy and plans, the findings described in Section 2.3 were used. The following strategies have been identified within the framework of the stakeholder expectations mentioned in Section 2.3.2:

- The grievance mechanism will be designed as a simple, easily accessible and quick process. This mechanism will also support proposals and conflict resolution.
- Complaints will be received through the Project website as a publicly accessible digital platform.
- Recorded complaints and feedback will be shared with the relevant stakeholders.
- A hierarchical order will be established in a way that will enable complaints to be resolved quickly and effectively.

⁶ Legal Base: Law no. 4982 on the Right to Information, Law No. 3071 on the Right to Petition

KOSGEB already has a mechanism in place for receiving and resolving complaints. This mechanism has four channels:

1. E-mail
2. Petition
3. KOSGEB Information Center
4. KOSGEB Call Center

All of these channels will be actively used throughout the project. The PMU will record information about the complaints in the register and present the relevant reports to KfW every 3 months.

Application via e-mail:

The e-mail addresses created by the Project Management Unit for the projects will be included in the relevant section of the Project website. This will ensure that complaints are recorded. Only anonymous applications and applications related to environmental and social requirements will be accepted through this channel.

Application via petition:

SME owners or their legal representatives, SME employees and other relevant stakeholders can make a complaint about the project using the printed complaint petitions and forms available from the KOSGEB Presidency and from the provincial directorates. In the event of a complaint being made necessitating an inspection process (favoritism, insults, complaints about the personnel, etc.), the complaint petition is forwarded to the KOSGEB Guidance and Supervision Board. Other complaints are forwarded to the relevant unit to be examined and resolved. The response to the complainant is communicated after being checked by the SME Development Department. The petition is kept in the KOSGEB documentation system.

KOSGEB Call Center:

The KOSGEB Call Center (444 1567) provides a 24/7 active information service. The Project Management Unit will provide training to Call Center employees to inform them about the project and to respond to complaints within their authority.

Presidency's Communication Centre (CIMER):

Any person or institution that is dissatisfied with the response received via the four channels mentioned above can apply to CIMER for information or to submit a complaint (<https://www.cimer.gov.tr>). The CIMER mechanism has been established to provide a rapid response to the requests, suggestions and complaints of the public. CIMER can be reached through three channels:

1. Via the application form available at <https://www.cimer.gov.tr>
2. Via the e-Government portal and KOSGEB website
3. Via phone (by calling 150)

Applications received by CİMER are forwarded to the Ministry of Industry and Technology. The Ministry communicates the applications to the KOSGEB Corporate Communication Directorate. Should the complaint necessitate an inspection (favoritism, insults, complaints about the personnel, etc.), the KOSGEB Corporate Communication Directorate communicates the complaint petition to the KOSGEB Guidance and Supervision Board. Other complaints are forwarded to the relevant unit to be examined and resolved. The relevant unit issues the necessary response. All applications are stored digitally at CİMER.

Table 6 shows the complaint response times.

Table 6: Complaint Response Times

Method of application	Maximum response time
Applications to the PMU via e-mail	Responded to within 2 working days. If additional processes are required due to extenuating circumstances, the complaint is resolved within 15 days.
Application via a petition	60 days in accordance with Law No. 2577
Application to KOSGEB Information Center	Responded to within 2 working days. If additional processes are required due to extenuating circumstances, the complaint is resolved within 15 days.
KOSGEB Call Center	Immediate response is provided. If additional processes are required due to extenuating circumstances, the complaint is resolved within 15 days.
CİMER	15 working days for information requests in accordance with Law no. 4982 on the Right to Information 30 days for special complaints, requests and notifications

Resolving the complaints of KOSGEB Personnel

KOSGEB personnel can communicate their requests, complaints and suggestions to the Management through the above-mentioned channels and can apply to the courts for administrative matters. The response times presented in Table 6 are applicable also to KOSGEB personnel.

Verbal or written applications and complaints are made to one's immediate supervisor. Complaints about the immediate supervisor are communicated to their supervisor. All personnel have the right to petition the Human Resources Department. Petitions are reviewed in this department and action is taken according to the KOSGEB Code of Human Resources and Discipline. The Code can be accessed from the KOSGEB intranet and web pages.

Complaints about the working environment are addressed with the involvement of the KOSGEB Support Services Department. The process for complaints related to ethical issues is

carried out in accordance with the rules of confidentiality. Such complaints are forwarded to the KOSGEB Guidance and Supervision Board. The complaint process is finalized within a maximum of 30 days. If an administrative and legal investigation is necessary, action is taken in accordance with the relevant laws.

Anonymous applications can be made to the PMU via e-mail. These applications are recorded by the PMU.

3.2.4. Management Organization and Use of Resources

The KOSGEB Project Management Unit (PMU) is responsible for the implementation of the stakeholder engagement plan. The PMU consists of the Project Manager, Finance Management Specialist, Monitoring and Evaluation Specialist, Environmental and Social Evaluation Coordinator and technical experts. The project manager is responsible for the management and monitoring of the stakeholder engagement plan and makes the necessary expert resource planning in this regard. In practice, they work in coordination with the other relevant departments of KOSGEB. KOSGEB will allocate the necessary human and financial resources to the implementation of the Plan.

3.2.5. Monitoring, Evaluation and Reporting

The Stakeholder Engagement Plan will be followed throughout the project. Monitoring will be carried out at central and regional levels, and the results of the monitoring will be combined and reported by the PMU. The monitoring information will serve as an input for the four-monthly Project progress reports. Three separate monitoring reports will be compiled: a Stakeholder Engagement Report, a Complaint Report and an Information Sharing Report. The information specified below will be included in the reports.

Stakeholder Engagement Report

The following information will be included in the report as a record of the interactions with each stakeholder:

- Monitoring period, date of report, KOSGEB Department that compiled the report
- Stakeholder (Name, gender and age for individuals)
- Stakeholder class (Public, NGO, SME, Individual-SuTP and Turkish, other)
- Stakeholder group (Gr 1, Gr 2, Gr 3, Gr 4) according to the Stakeholder Database)
- Purpose of interaction (consulting, informing, negotiating, conflict resolution, cooperation, other)
- Interaction channel (Face-to-face meeting, online meeting, e-mail, other)
- Subject of interaction and action taken (Environmental and social, Project supports, other)
- Evaluation (stakeholder's contribution to the project, project's contribution to the stakeholder, opinions and suggestions)

Grievance Report

The following information will be included in the report as a record of any complaints⁷:

- Monitoring period, date of report, KOSGEB Department that compiled the report
- Complainant (Name, Public, NGO, SME, foreign national under international and temporary protection, Turkish citizen, other)
- Complaint channel (PMU, petition, KOSGEB Information Center, KOSGEB Call Center, CİMER)
- The subject of the complaint (Environmental and social, project support, KOSGEB personnel, other)
- Date of issuance of the complaint, Date of resolution of the complaint
- Complaint resolution method
- Evaluation (challenges, etc.)

Information Sharing Report

The following information will be included in the report as a record of stakeholder information:

- Monitoring period, date of report, KOSGEB Department that compiled the report
- Date of information
- The subject of the information (Environmental and social, project supports, KOSGEB personnel, other)
- Information channel (e-mail, printed media, social media, KOSGEB website, other)
- Evaluation (reason for information etc.)

The compilation of the reports is the responsibility of the PMU at a central level, and the KOSGEB directorates in the provinces. The reports will be reviewed by the PMU and consolidated monitoring tables containing the following information will be prepared and included in the progress reports:

Stakeholder Engagement Monitoring Table (by provinces, center and overall)

- Monitoring period, date of preparation of the monitoring table
- Number of public institutions, NGOs, SMEs, foreign nationals under international and temporary protection, Turkish citizens and other stakeholders interacted with
- Number of Group 1, 2, 3 and 4 stakeholders interacted with
- Purpose of interaction (number of consultation meetings, number of information meetings, number of negotiation meetings, number of cooperation meetings, number of meetings for other purposes)
- Interaction channel (Number of face-to-face meetings, number of online meetings, number of e-mails, number of meetings through other channels)
- Topic of interaction and follow-up action
- Evaluation

⁷ For the reporting of complaints, the automatic information facilities of KOSGEB's existing system will be used.

Complaint Monitoring Table (by province, center and overall)

- Monitoring period, date of preparation of the monitoring table
- Number of complainant Public Institutions, NGOs, SMEs, foreign nationals under temporary and international protection, Turkish citizens
- Complaint channel (number of complaints made to the PMU by e-mail, number of complaints by petition, number of complaints to the KOSGEB Information Center, number of complaints to the KOSGEB Call Center, number of complaints to CİMER)
- Subject of complaint (Number of complaints about environmental and social issues, project supports, KOSGEB personnel, other complaints)
- Number of complaints responded to on time, number of complaints not responded to in time
- Evaluation (the areas in which more complaints are made, the challenges encountered, suggestions for corrective actions, outcomes of the corrective actions suggested in the previous period, etc.)

Information Sharing Table (by province, center and overall)

- Monitoring period, date of information
- Information subject (Number of information disseminations on environmental and social issues, project supports and other issues)
- Information channel (number of information disseminations made via e-mail, printed media, social media, the KOSGEB website, and through other channels)
- Evaluation

The report and table formats to be used in monitoring activities will be developed by the Implementation Consultant.

Documents, monitoring reports, and monitoring tables related to interaction, complaints and information activities will be maintained in the KOSGEB database. Reports and tables will be analyzed and the results will be presented to the KOSGEB management. Appropriate topics will be addressed at the Steering Meetings.

At the end of the first and second years of the Project, SMEs who receive support will take a satisfaction survey, the results will be reported and the necessary corrective measures will be taken.

Revision, Reporting to Stakeholders

The stakeholder engagement plan will be updated to maintain its effectiveness in the relevant implementation stages of the Project, and the information and methods in the plan will be kept up-to-date and valid. In the event of a significant change in the Project, it will be announced on the KOSGEB website and reflected in the stakeholder engagement plan.

The performance indicators in the monitoring tables will be shared on the KOSGEB website.

Stakeholder engagement monitoring reports will be submitted to KfW along with the four-monthly progress reports.