

Ankara Bus Project

Stakeholder Engagement Plan

December 2020

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Glossary of terms

Term	Definition
Consultation	Consultation is a two-way process of dialogue between the project sponsor and its stakeholders. Stakeholder consultation is about initiating and sustaining constructive external relationships over time.
Grievance Mechanism	Procedure provided by a project to receive and facilitate resolution of affected communities' concerns and grievances about the project's environmental and social performance.
Environmental and Social Impact Assessment (ESIA)	A forward-looking instrument that is able to proactively advise decision-makers on what might happen if a proposed activity is implemented. Impacts are changes that have environmental, political, economic, or social significance to society. Impacts may be positive or negative and may affect the environment, communities, human health and well-being, desired sustainability objectives, or a combination of these.
Information Disclosure	Disclosure means making information accessible to interested and affected parties (stakeholders). Communicating information in a manner that is understandable to stakeholders is an important first and ongoing step in the process of stakeholder engagement. Information should be disclosed in advance of all other engagement activities, from consultation and informed participation to negotiation and resolution of grievances. This will make engagement more constructive.
Stakeholders	Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project or the ability to influence its outcome, either positively or negatively.
Stakeholder engagement	Stakeholder engagement is an ongoing process involving (i) the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders; (ii) meaningful consultation with potentially affected parties, and (iii) a procedure or policy by which people can make comments or complaints.

Source: Based on EBRD Performance Requirements and International Finance Corporation Good Practice Handbook on Stakeholder Engagement (2007)

1 Introduction

1.1 Overview

Ankara Metropolitan Municipality (AMM) and Ankara Transport Company (EGO) is developing Ankara Bus Project, which is aimed at improving public bus services, the existing rubber-wheeled public transport fleet of EGO in the city of Ankara, Turkey. The project consists of one CNG filling station construction and enhancement of EGO's the bus fleet through the purchase of up to 254 Compressed Natural Gas ("CNG") buses and up to 28 diesel buses (Euro 6 compliant).

This document is the stakeholder engagement plan (SEP) for the Project. The purpose of SEP is to promote the project's approach to stakeholder engagement throughout its lifecycle. It has been developed at the beginning of the construction phase of one CNG filling station. The SEP includes outlining the responsibilities of the project company and contractors in the implementation of stakeholder engagement activities, including how the project company and contractors will communicate with stakeholders, how stakeholders can raise their concerns, and provide their feedback to the project.

It has been prepared in line with Turkish law and the EBRD Environmental and Social Policy (ESP) and Performance Requirements (PRs).

1.2 Objectives, Structure and Scope

The purpose of the SEP is to provide a communication strategy for the project which:

- Provides a comprehensive and culturally appropriate approach to consultation and disclosure for the lifecycle of the project.
- Defines the project's legal requirements concerning disclosure and consultation.
- Identifies stakeholder groups that could be affected or may have an interest in the project.
- Enables appropriate engagement of stakeholders through a process of information disclosure and meaningful consultation on environmental and social issues that could potentially affect them.
- Plans for stakeholder engagement which is free of manipulation and interference and are conducted on the basis of timely, relevant, understandable, and accessible information in a culturally appropriate format.
- Provides a grievance mechanism to allow communities and other stakeholders to register complaints, queries or comments that are addressed in a timely manner by the project.

The scope of this SEP covers the construction phase and the operational phase of the project and existing operation of EGO. It includes several sections relating to:

- Stakeholder engagement requirements
- Summary of previous stakeholder engagement activities
- Stakeholder analysis
- Stakeholder engagement programme
- Public grievance mechanism
- Monitoring and reporting

1.3 Project description

The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") has been requested by Ankara Metropolitan Municipality ("AMM" or the "City") and Ankara Transport Company ("EGO" or the "Company") to provide loan financing of up to EUR 45 million to EGO, a public transport company incorporated in the City of Ankara in Turkey, affiliated to the City. The proceeds of the loan will be used to finance the enhancement of the bus fleet through the purchase of:

- 254 Compressed Natural Gas ("CNG") buses
- Up to 28 diesel buses (Euro 6 compliant)
- a CNG filling station (the "Project")

EGO is the main bus operator in the City of Ankara with 1,562 buses operating on 414 lines, with a total distance of 15,690km. In addition to the municipal bus operations, Ankara is currently served by a cable car system, a suburban rail named Ankaray and four metro lines of the Ankara Metro. In total, EGO operates a 64.3km rail network (including 8.3km light rail line). The Company uses an e-ticketing system, which is fully integrated with rail systems and cable car lines. Another transportation service available in Ankara is the commuter rail (27km), also known as the Baskentray which is integrated to the metro. The commuter rail is operated by the State Railway Company of Turkey.

EGO was established in 1942 to serve the City of Ankara on a wide range of services such as electricity, coal gas, and public transport and currently has 601 employees. The Company is an institution affiliated to AMM and has its own independent budget and organizational structure.

EGO also has five depots (Çankaya (No.1), Yenimahalle (No.2), Mamak (No.3), Altındağ-Keçiören (No.4) and Sincan-Etimesgut (No.5)) and 50 departure stations associated with these depots. The CNG filling station in the project will be constructed in the depot Sincan-Etimesgut (No.5).

When the depots in Çankaya (No.1), Mamak (No.3), and Altındağ-Keçiören (No.4) were first built they were remote from the city but over time they have become built up and are now surrounded by residential buildings. So, EGO planned to move these three facilities outside the city. The construction of the facilities in third depot is finished (photos of new depot in Mamak (No.3) are presented in Appendix C). All units will be moved from the depot in Mamak (No.3) to the new facilities to the new depot in Mamak after the finalization (almost in one month) of the road construction. The construction of the facilities in the depot in Çankaya (No.1) is still ongoing. Once it has finished, the depot will be moved to the new depot in Gölbaşı.

The new site for the relocation of the depot in Altındağ-Keçiören (No.4) facility has been determined and will be established in Ovacık. Satellite images of five depots and new depot 3 in Mamak and depot 1 in Gölbaşı are presented in the following photos.



Photo 1.1 Satellite image of the depot in Çankaya (No.1) - OLD

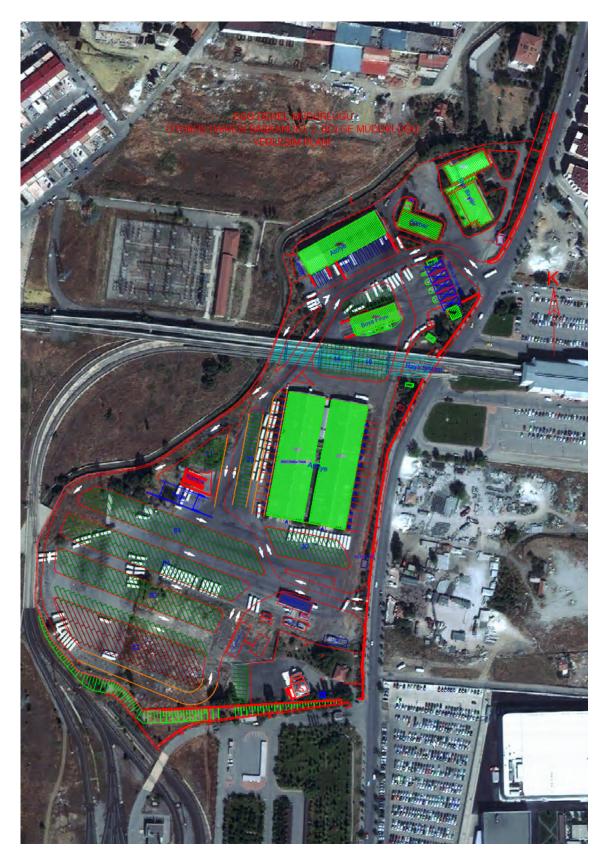


Photo 1.2 Satellite image of the depot in Yenimahalle (No.2)



Photo 1.3 Satellite image of the depot in Mamak (No.3) - OLD



Photo 1.4 Satellite image of the depot in Altındağ-Keçiören (No.4)



Photo 1.5 Satellite image of the depot in Sincan-Etimesgut (No.5)



Photo 1.6 Satellite image of the depot in Gölbaşı (1) - NEW



Photo 1.7 Satellite image of the depot in Mamak (3) - NEW

EGO operates two types of buses.

 The buses operated under EGO's responsibility (the bus drivers for this service are provided from BUGSAS Company, the main bus route operator, contracted to EGO)

- The private-public transport buses operated by private owners which are monitored by EGO. These private buses are also separate into three sections:
 - 199 private community buses
 - 442 private-public transportation buses
 - 170 private-public transportation buses

2 Stakeholder engagement requirements

2.1 National legal requirements

EGO's activities are exempt from the Environmental Impact Assessment (EIA) process and do not require an Environmental Permit under the Turkish EIA Regulation and Environmental Law and Regulations. Thus, the project does not meet the criteria for a meeting, a public hearing or a disclosure period under Turkish law.

2.2 International requirements

EBRD Performance Requirements

The project is seeking finance from the EBRD, and thus will be structured to meet EBRD's 2019 Environmental and Social Policy (ESP) requirements for Category B projects including Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement, and to satisfy the Bank's commitment to disclosing project information as set out in EBRD's 2014 Public Information Policy (PIP) document.

The EBRD's ESP defines stakeholder engagement as an on-going process which involves:

- Public disclosure of appropriate information
- Meaningful consultation with stakeholders
- An effective procedure or mechanism by which people can make comments or raise grievances

The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project. The EBRD requires that stakeholder engagement:

- Provides affected communities and other interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion, and intimidation.
- Involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.
- Is proportionate to the nature and scale of the project and its potential adverse impacts on the affected communities, the sensitivity of the environment, and the level of public interest.
- Is based on clearly defined roles, responsibilities, and authority as well as designated personnel of the Company to be responsible for the implementation and monitoring of consultation and disclosure activities.

Special provisions will be made to identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status, and to allow such groups or individuals to be informed about project information and give their views on the project where appropriate.

According to the EBRD Gender 1 Urban rehabilitation and transport projects Guidance Note:

Gender-sensitive stakeholder analysis should be undertaken

- Gender-sensitive stakeholder analysis should be reviewed more than once during the project life cycle.
- A gender-sensitive Stakeholder Engagement Plan (SEP) should be prepared or all EBRDsupported infrastructure projects.

This SEP has been prepared to meet the above requirements.

3 Summary of previous stakeholder engagement activities

3.1 Previous public disclosure

A transportation workshop was conducted on 20 November 2019 with the participation of several selected stakeholders. Before and after the workshop announcements were made about the Project from the webpage of EGO. (Before:

https://www.ego.gov.tr/tr/haber/5389/ankara-ulasim-calistayi - After: https://www.ego.gov.tr/tr/haber/5390/baskentte-ulasim-calistayi-toplandi%E2%80%A6 -

Screenshots of these webpages which have published date and number of pageviews are presented in Appendix E). The project's announcement was also made in the workshop. The invitees and participants of the workshop were provided as below:

- All District Municipalities of Ankara (There are 25 districts in Ankara),
- Universities in Ankara
- Directorate for the European Union
- Dutch Embassy
- European Union Delegation to Turkey
- Trade associations (related to electrical engineering, mechanical engineering, civil engineering, environmental engineering, city planners, architects, landscape architects, map engineering and computer engineering)
- PROTA AŞ
- CB Consulting
- Local and National Associations (Turkey Mukhtar's Federation, Bicycle Movement Association, Informatics Association of Turkey, City Council, Çayyolu District Council, 100th Anniversary Initiative, Cigdemim Association, Consumer Rights Association, Çankaya Mukhtars Association, Association of Women Mukhtars, Kavaklıderem Association, TEMA Foundation, Pedal Women, Intelligent Transportation Systems Association)
- Internal Stakeholders (several head of departments)

EGO stated that no objection to the project had been raised since the workshop. However, regarding the mobilization of three depots, Çankaya (No.1), Mamak (No.3), and Altındağ-Keçiören (No.4), no disclosure activities have been conducted yet.

4 Stakeholder analysis

4.1 Stakeholder identification and analysis

Stakeholders are people and groups affected by the project, are likely to be interested and/or and could influence the outcome of the project. In order the engage these individuals and groups, identification of these groups is necessary.

To focus strategically on the stakeholders, a stakeholder mapping exercise was carried out. A list of interested and affected parties was generated based on discussions with EGO and analysis of how best to engage each group is presented in Table 4.1.

EGO recognises that specific attention may need to be given to impacted women and vulnerable groups in order that they are not overlooked in the stakeholder engagement process and to enable their views and concerns to be heard and incorporated into project planning and implementation. EGO will apply this approach in its existing operations considering the stakeholders related to departure stations and the mobilization process of the depots and for the stakeholders near/related to the new depot areas.

EGO will continue to have this approach throughout the project lifecycle to identify any individuals and groups that may be differentially or disproportionately affected by the construction and operation activities of the Project and EGO because of their disadvantaged or vulnerable status (including individuals/groups such as those with disabilities or limited education who may be particularly susceptible to project-related impacts).

This SEP takes account of mandatory, national Covid-19 restrictions and social distancing in line with the requirements in Covid-19 Stakeholder engagement (PR10) EBRD briefing note and plans engagement which is appropriate during the pandemic¹.

Issues to be

Communication methods

Table 4.1 Identification of stakeholders and consultation methods

consulted/discussed Internal stakeholders Construction workers. Information in individual worker Training on environmental, contract, toolbox talks, bulletin contractors and contractors' health and safety aspects workers (bus drivers, security board, training, grievance Consultation on the personnel, maintenance staff procedure implementation of the etc.), workers under the related policy, procedures relevant departments of EGO, and management plans private-public transport bus related with labour related drivers, owners and aspects and employee cooperatives (there are sixteen rights private-public transport Awareness training on cooperatives), trade union Gender-based violence and committees and employee harassment (GBVH) and representatives, other nonvulnerable employees employee workers Covid-19 measures Traffic and road safety Grievance mechanism

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Stakeholders

¹ For further information please see Covid-19 Stakeholder engagement (PR10) EBRD briefing note (ttps://www.ebrd.com/covid19-consultation.pdf)

Stakeholders Communication methods Issues to be consulted/discussed External stakeholders Community members Residents of 25 Districts, Project website2, social media Project information- scope including vulnerable and (Facebook and Instagram), and E&S Principles disadvantaged groups, such as; community grievance mechanism, Community health and posters/signs posted on the buses safety (including restricted Disabled (90,707 people in or brochures distributed at the bus access and security) stations, surveys and Traffic and road safety Elderly (486,783 people as of questionnaires (online), online Covid-19 measures April 2020) engagement, radio call-in shows, Grievance mechanism telephone engagement and TV Unemployed (841,663 people announcement on buses (if process in 2019) available) Information on significant (total population of Ankara was changes to the construction 5,639,076 in 2019) programme, if any (e.g. delays) Vulnerable people and **GBVH** awareness campaigns Allow to provide opinions and views Members of villages/districts in Project website, social media Project information-scope close proximity to the depots, (Facebook and Instagram), and E&S Principles including the new depots community grievance mechanism, Traffic and road safety surveys and questionnaires Community health and (online), online engagement, radio safety (including restricted call-in shows and telephone access and security) engagement Covid-19 measures Grievance mechanism process Information on significant changes to the construction programme, if any (e.g. delays) Allow to provide opinions and views Members of villages/districts in Project website, social media Project information-scope (Facebook and Instagram), close proximity to the departure and E&S Principles stations community grievance mechanism, Traffic and road safety surveys and questionnaires Community health and (telephone, online), online safety (including restricted engagement, radio call-in shows access and security) and telephone engagement Covid-19 measures Grievance mechanism process Information on significant changes to the construction programme, if any (e.g. delays) Allow to provide opinions and views Vulnerable groups: Project website, social media Project information-scope (Facebook and Instagram), and E&S impacts and Disabled passengers, road community grievance mechanism, mitigation measures users and pedestrians surveys and questionnaires targeting vulnerable people Female passengers, road (telephone, online), online Traffic and road safety engagement, radio call-in shows users and pedestrians Subsidies and special and telephone engagement assistance programmes for vulnerable people

² EGO's website can be found at: https://www.ego.gov.tr/tr

Stakeholders Communication methods Issues to be consulted/discussed Pregnant passengers, road Grievance mechanism users and pedestrians process Information on significant Elderly passengers, road changes to the construction users and pedestrians programme, if any (e.g. Children passengers, road delays) users and pedestrians Allow to provide opinions and views Bicycle and motorcycle users Other vulnerable groups Gender-sensitive stakeholders³ Project website, social media Project information-scope Female bus drivers and (Facebook and Instagram), and E&S Principles security guards serving EGO confidential gender-sensitive public Awareness training on Female passengers, road grievance mechanism, surveys GBVH and specific users and pedestrians and questionnaires (online), online communication channel engagement radio call-in shows Female workers of EGO and (confidential genderand telephone engagement, sensitive worker grievance its contractors, including confidential gender-sensitive mechanism) female senior managers worker grievance mechanism Grievance mechanism Association of Women process Mukhtars Information on significant changes to the construction programme, if any (e.g. delays) Allow to provide opinions and views Non-governmental and civil society organisations NGOs - local, national or Private meetings and workshops Project information-scope international: (online or face to face), project and E&S Principles website, direct communications if Trade associations (related to Specific communications on requested, community grievance electrical engineering, design and implementation mechanism, telephone of mitigation measures with mechanical engineering, civil engagement engineering, environmental trade associations, when engineering, city planners, necessary architects. landscape Guidance on GBVH and architects, map engineering vulnerable people and computer engineering) awareness Local and National Allow to provide opinions Associations and views (Chambers of drivers, Turkey Mukhtar's Federation, Bicycle Movement Association, Informatics Association of Turkey, 100th Anniversary Initiative, Cigdemim Association, Consumer Rights Association, Kavakliderem Association, Turkish Foundation for Combating Soil Erosion, for Reforestation and the Protection of Natural Habitats (TEMA) Foundation, Pedal Women, Intelligent Transportation Systems Association) NGOs and academicians dealing with children, disabled

issues

people, women and GBV

³ For further information please see EBRD Gender 1 Urban Rehabilitation and Transport Projects Guidance Note (https://www.ebrd.com/news/publications/guides/gender-1-urban-rehabilitation-and-transport-projects.html).

Stakeholders Communication methods Issues to be consulted/discussed (Six Points Association of the Blind, Turkey Confederation of Disabled, Association of Solidarity for All Disabled People and Their Families, International Children's Centre, Association of Children's Rights, Association of Children's Rights Volunteers, Association of the Avoidance of Child Abuse and Neglect, International Confederation on Respect to Ageing, Seniors Council Association. Association of Women Mukhtars, Association of Women with Disabilities, Turkish Women's Union, Association of Social Support for Women, Association for Monitoring Gender Equality, Pink Life LGBTT Solidarity Association, Association for Gender Research) Governmental agencies Ministry of Environment and Private meetings, project website, Discussion with the relevant department on issues Urbanization direct communications if requested community grievance mechanism, associated with the Project Ministry of Transport and Infrastructure telephone engagement Project's environmental and health and safety and social Security forces and traffic police impacts Ankara Metropolitan Municipality Community health and Ankara Metropolitan safety measures Municipality's Women's Traffic and road safety Department Ankara Municipality's Women Allow to provide opinions Counselling Centre and views All District Municipalities Local and National Associations (City Council, Çayyolu District Council, Çankaya Mukhtars Association) International lenders **EBRD** Formal communication, telephone Environmental, health and engagement, progress and safety and social aspects monitoring reports Project progress Other stakeholders Discussion with the relevant Universities in Ankara Formal communication, project website, telephone engagement, department on issues Directorate for the European telephone engagement, online associated with the Project Union engagement, radio call-in shows Allow to provide opinions **Dutch Embassy** and views European Union Delegation to Turkey

Local public newspapers, local radio, local TV channels

5 Stakeholder engagement programme

5.1 Stakeholder engagement programme

The stakeholder engagement programme outlines a systematic approach to inform and communicate with stakeholders throughout the Project lifecycle.

In this section, EGO's main activities that will be undertaken during the construction phase, on an on-going basis throughout the life of the project and its existing operations will be set out. Specific consultation and disclosure activities, responsible parties and timing for these activities are presented in Table 5.1 Stakeholder Engagement Programme. Specific timeframes within the construction phase will be updated following the finalisation of the tender process.

Table 5.1 Stakeholder engagement programme

Activity	Timing/detail	Responsibility
1) Construction phase engagement		
 Disclosure of Non-Technical Summary (NTS), SEP and grievance mechanism on the project website 	1 November 2020	EGO
 Clear statements to be made in NTS regarding the impacts of the project and the benefit of the projects to the improvement of public transportation services 		
 Clear statements to be made in NTS regarding the impacts of EGO's existing operations in depots, departure stations and related to the ongoing mobilization process of depots 		
 Information on community health, safety and security, should also be included in the NTS 		
 Include grievance mechanism in NTS 		
Disclosure of workers' grievance mechanism	When workers are recruited and disclosed to subcontracted workers when they join the project.	EGO and contractors
Awareness training on traffic and road safety	When workers are recruited and continuous during employment	EGO and contractors
 Training on environmental, health and safety aspects Consultation on the implementation of the related policy, procedures and management plans related with labour related aspects 	When workers are recruited and continuous during employment	EGO and contractors
Training on Covid-19 measures	When workers are recruited and continuous during employment	EGO and contractors
Announce commencement of site work and duration of construction phase	Just prior to commencement of construction	EGO/Tender winner
Announce significant changes to the construction programme, if any (e.g. delays)	TBC	EGO/Tender winner

	Activity	Timing/detail	Responsibility
•	Ongoing community liaison and grievance process	Commencing when construction starts Ongoing	EGO
•	At milestones of the project regular updates of website, social media, in local/ national newspapers and on radio	Ongoing	EGO
•	Conduct awareness campaigns on road and traffic safety for school children and wider community members along the transport routes for construction	Annually	EGO
•	Conduct information campaigns related with Covid-19 measures including posters on buses and at bus stops	Ongoing	EGO
•	Conduct trainings for internal stakeholders on understanding and preventing GBVH and vulnerable people	Ongoing	EGO
•	Specific communications on design and implementation of mitigation measures with trade associations, when necessary and guidance on GBVH and vulnerable people awareness with NGOs	At least annual and/or when necessary	EGO
•	Discussion with the relevant department on issues associated with the Project with governmental agencies	As per requirement to obtain permission and opinion	EGO
•	Update SEP	Annually	EGO
•	Annual reporting to affected communities on environmental and social performance	Annually	EGO
•	Announce end of construction phase and movement into operations	At end of construction	EGO
2) Operational phase engagement		
•	Ongoing community liaison and grievance process	Ongoing	EGO
•	Conduct awareness campaigns on road and traffic safety for school children and wider community members along the transport routes for operation	Annually	EGO
•	Conduct trainings for internal stakeholders on understanding and preventing GBVH and vulnerable people	Ongoing	EGO
•	Conduct information campaigns for external stakeholders including posters on buses and at bus stops with policy statements such as zero tolerance for GBVH.	Ongoing	EGO
•	Specific communications on design and implementation of mitigation measures with trade associations, when necessary with NGOs	At least annual and when necessary	EGO
•	Consultation and guidance on GBVH and vulnerable people awareness with NGOs		
•	Training/workshop on GBVH with chamber of drivers	Ongoing	EGO
•	Discussion with the relevant department on issues associated with the Project with governmental agencies and other stakeholders	As per requirement to obtain permission and opinion	EGO

Activity	Timing/detail	Responsibility
Update SEP	Annually	EGO
Annual reporting	Annually	EGO

5.2 Roles and responsibilities

EGO has a specific department, Service Improvement Directorate (under Service Improvement and Institutional Development Department), to conduct public communication and manage the public grievance mechanism, Başkent 153.

A project-specific community liaison officer (CLO), working in Service Improvement Directorate related to Başkent 153, will be appointed for the stakeholder engagement activities. These include managing the implementation of this SEP, arranging communications with stakeholders via the mentioned methods in Table 4.1, management of the grievance mechanism, and attending and recording stakeholder engagement activities and maintaining regular lines of communication with key stakeholders.

All comments, suggestions and grievances will be submitted to the CLO through the following contact information:

- Name: Esra BAYDAR KARABAY
- Postal Address: EGO Genel Müdürlüğü Emniyet Mah. Hipodrom Cad. No:5 Kat:3 Yenimahalle/Ankara
- E-mail address: esra.karabay@ego.gov.tr
- Project Website: www.ego.gov.tr
- Dedicated Grievance Telephone Number: +90 312 507 1056 2929

6 Public grievance mechanism

6.1 Overview

Service Improvement Directorate has the responsibility to manage the public grievance mechanism, Başkent 153. In Baskent 153, grievances/suggestions can also be raised by calling 24 hours call centre (namely Alo 153) and through application on a smartphone, social media (such as Instagram, Twitter, etc.) and the webpage (https://www.ego.gov.tr/tr/sayfa/50/ego-iletisim). In the webpage, a form is available under EGO's General Directorate and it enables users to specifically describe grievances and requests via boxes on the form (i.e. boxes to define line number and station number of EGO). The contact Information of Bus Management Department and Transportation Regions for each depot are also given in this webpage. In addition to Baskent 153 system, EGO will allow the grievance mechanism permits anonymous complaints, respects the confidentiality of the role players involved, and protects both the complainant and the company from retaliation. Moreover, EGO will publicise the grievance mechanism procedure to stakeholders. The mechanism will be based on the principles of being legitimate, accessible, predictable, equitable, transparent, rights compatible, continuous learning, and dialogue based. The grievance mechanism can be used to determine lessons learned and identify ways for continuous improvement.

Projects Department and Service Improvement Directorate will be responsible the publication of SEP and NTS documents in both Turkish and English languages, and ensuring they are distributed to the appropriate stakeholders. EGO will develop a specific webpage for the Project under its existing company webpage and publish SEP and NTS from the project web page.

6.2 Confidentiality and anonymity

EGO will protect a person's confidentiality of complainants and will guarantee anonymity in annual reporting in line with the personal data protection law. Investigations will be undertaken in a manner that is respectful of the aggrieved party and the principle of confidentiality. The aggrieved party will need to recognise that there may be situations when disclosure of identity is required, and the Project will identify these situations to see whether the aggrieved party wishes to continue with the investigation and resolution activities. The main principle of EGO is to protect the safety and security of the people who raise complaints. This is especially critical in gender-based violence and harassment cases.

6.3 Grievance reporting and resolution

The main steps for handling grievances are receive, categorise, acknowledge, investigate, respond, allow for recourse/appeal and follow-up, and close out.

Receive / acknowledge: Grievances will be logged in a formal logging system for which the CLO will be responsible. People may register grievances using the form in Appendix A or by contacting the CLO or online using the Project website or social media. Contact details for the CLO will be included in appropriate Project communication materials such as the Non-Technical Summary document and are found in section 5.2.

Categorise: The CLO will classify grievances according to Table 6.1.

Table 6 1	Grievance	Classification	Criteria

Classification	Risk level (to health, safety or environment)	Response
Low	No or low	The grievance may not be related to project performance, it may be a comment, or a request. CLO will acknowledge complaint within 5 days and conduct an investigation if required. The CLO will document findings and provide a response within 30 days of receiving. The response is likely to have minimal cost in addition to time spent on addressing the issue.
Medium	Possible risk and likely a one-off event	CLO will acknowledge complaint within 7 days. The CLO and an appropriate investigation team will conduct investigation. The Site Manager or Occupational Health and Safety Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response within 30 days of receiving complaint. The corrective action is likely to be straight forward involving changing a piece of equipment or procedure which does not take long or have substantial cost implications to implement.
High	Probable risk and could reoccur	CLO will acknowledge the complaint within 7 days and will get the Project Manager to organise a major investigation team for prompt investigation and resolution. Work may be stopped in the affected area. The CLO will provide a response within 30 days of receiving complaint. If more time is needed to complete the investigation this will be communicated to complainant within 30 days of receiving complaint. As necessary the response will include a press release. The corrective action may be complex or sensitive involving changing equipment or a procedure which requires training of staff and has substantial cost implications.

<u>Investigate</u>: Where investigations are required, Project staff and outside authorities as appropriate, will be requested to assist with the process. The CLO will collaborate with the Company management to identify an appropriate investigation team with the correct skills to review the issue raised. The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities.

Review of complaint/application: the CLO will explain in writing to the complainant (or where literacy is an issue, orally) the review process, the results, any changes to activities that will be undertaken to address the grievance and how the issue is being managed to meet appropriate environmental and social management systems. In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions. Grievances should not be rejected without prior investigation. Registered complaints are defined, reviewed and followed as stated below:

- Status New: This is the status indicating that the application has just been received in the system.
- Status Pending: It is the status indicating that the application has been classified and transferred to the unit concerned with the complaint.
- Status In Progress: The status indicating that the unit has been processed by the expert user.
 The expert tests the suitability of the application to the unit, and if it is not suitable, s/he returns the complaint and forwards it back to the previous stage. If the application unit is of interest, it starts the resolution process by processing.
- Status Answered: It is the status indicating that the application has been answered by the relevant unit expert in the internal mechanism. The application answered by the expert user is

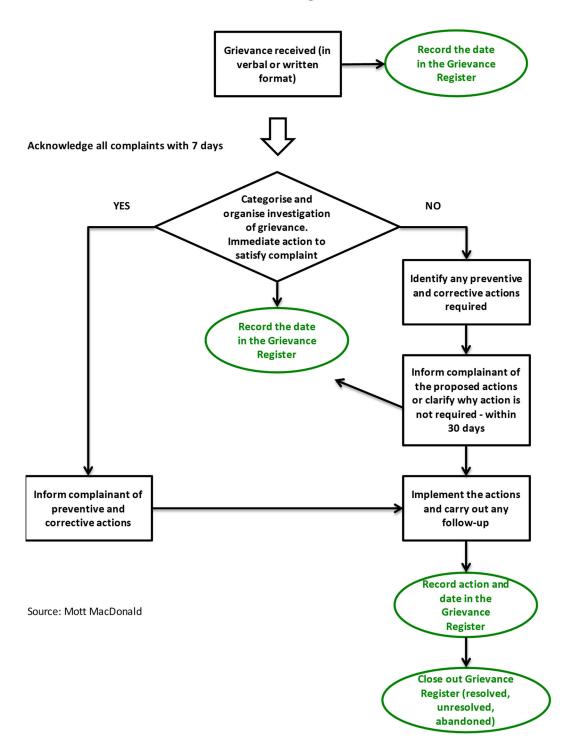
- evaluated by the APPROVAL [ONAY] team. If the evaluated application response has a content that can be conveyed to the citizen, the application is forwarded to the next stage.
- Status Concluded: It is the state that states that feedback is provided to the citizen through his preferred communication channel

Questionnaires are sent to randomly selected citizens through the Başkent 153 System, based on the answers given by the EGO General Directorate units. The answers given are converted into percentage satisfaction points.

EGO will reflect these steps and grievance classifications in its monthly submitted grievances/suggestions analysis reports. The CLO will summarise grievances weekly during construction and monthly during operation, removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity. The procedure will be at no cost and without retribution to the complainant and stakeholders. The procedure for processing grievances is depicted in Figure 6.1. Grievances may also be raised via the contractors.

Figure 6.1 Flowchart for processing grievances

Flowchart for Processing Grievances



6.4 Gender based Violence and Harassment Cases

A separate grievance mechanism and reporting system, that enables complaints and grievances on sexual harassment, exploitation and abuse to be reported in a safe and confidential way, will be established; one for use by workers, administered by human resources

with outside expertise on gender-based violence and harassment (GBVH) when needed; and another for use by passengers and affected communities, administered by a trained expert. The grievance mechanisms will provide the opportunity to report grievances anonymously. Complainant's health and safety and privacy will be key principles in handling GBVH related complaints. Information about the existence of the GBVH grievance mechanisms will be communicated to all stakeholders.

6.5 Complaints to EBRD's Independent Project Accountability Mechanism (IPAM)

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet], including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, reviews environmental, social and transparency-related issues raised by Project-affected people and civil society organisations about EBRD financed projects.

7 Monitoring and Reporting

7.1 SEP Reporting

The SEP will be reviewed by the EGO Management throughout the Project planning phase as deemed necessary or annually, before and after the Project construction phase and annually once the Project is operational in order to assess whether:

- The type of consultation and disclosure activities are appropriate for different groups of stakeholders
- The frequency of consultation activities is sufficient
- Grievances are being adequately dealt with
- The stakeholder list remains appropriate and whether engagement should cease or be extended to any stakeholders

Additional updates influenced by the Project development may be required.

7.2 Community Relations Team and Complaint Management Centre of Ankara Metropolitan Municipality

Ankara Metropolitan Municipality has a coordination centre namely Başkent 153 that receives and monitors all the issues, opinions and requests and convey these to its relevant units (Ankara Metropolitan Municipality, Ankara Water and Sewerage Administration and EGO). As mentioned in Section 6.1., grievances/suggestions can be raised by calling 24 hours call line "Başkent 153" and through application on a smartphone, social media (such as Instagram, Twitter, etc.) and the webpage (https://www.ego.gov.tr/tr/sayfa/50/ego-iletisim). A form is available under EGO's General Directorate (in the webpage) and it enables users to specifically describe grievances and requests via boxes on the form (i.e. boxes to define line number and station number of EGO). The contact Information of Bus Management Department and Transportation Regions for each depot are also given in this webpage.

7.3 Reporting

The Community Liaison Officer (CLO) will be responsible for:

- Grievance logging and tracking: each grievance will be logged, given an identification number and followed through by recording details and timing for their resolution and closing out
- Monthly grievance reporting to Service Improvement Directorate of EGO at Project planning phase
- Weekly grievance reporting to Service Improvement Directorate of EGO during the Project construction phase
- Monthly grievance reporting to Service Improvement Directorate of EGO at the operation phase, and
- Annually to inform the annual E&S Report to the EBRD (for the duration of the Loan Agreement) and SEP updates
- Listing disclosure activities, adverts placed in newspapers and other media, press releases
- Keeping minutes of consultation meetings with dates, venue, list of participants and photos

- Retaining original written consultation correspondence including comments left as evidence of the process and outcomes
- Liaise with community relations team of the Ankara Metropolitan Municipality and ensure all
 complaints sent to them are also addressed by EGO and their contractors in a timely
 manner.

7.4 Annual Reporting

A project specific report summarising project performance, including stakeholder engagement and grievances, will be produced at the end of the construction phase for affected communities. Information about the project during its operational phase will be included in the sponsor's annual reports.

7.5 Performance Evaluation

Performance in stakeholder engagement will be evaluated by the Company and the CLO against the goals and objectives set out in this SEP. The evaluation will review to what extent the SEP activities have been completed and how the identified goals have been achieved. Evaluation results and any lessons learned will be incorporated in the respective SEP updates.

Appendixes

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A. Grievance form

Full Name

Please enter below your contact information and grievance. This information will be dealt with as confidential. If you still wish to remain anonymous, please enter your comment / grievance in the box below without indicating any contact information – your comment / grievance will still be considered and addressed. Please be advised that no response or feedback will be provided to anonymous grievance forms.

Contact Information	By Post: Please provide mailing address
Please identify how you wish to be	By telephone:
contacted (mail, telephone, e-mail)	By e-mail:
Preferred language of communication?	Turkish English
Description of incident or grievance	
(What happened? Where did it happen? Where	no did it happen to? What is the result of the problem?):
Date of incident/grievance	
	One-time incident/grievance (date)
	Happened more than once (how many times?)
	On-going (currently experiencing problem)
What would you like to see to resolve this p	roblem?
Internal Use Only	
Grievance received by:	
Date:	
Reference number:	

B. Grievance log

Ref No	Date of Registration	Name/ Anonymous	Contact Details	Grievance Description	Person responsible for follow-up	Expected Resolution	Initial Res	sponse	Action taken to avoid future similar grievances			Resolution	
	dd/mm/yy	Person/ Organisation	Post/ Phone/ Mail				Date E	By whom		Nature of Resolution	Date	Resolved/ Addressed by	Is Compliant Satisfied (if no, why?)

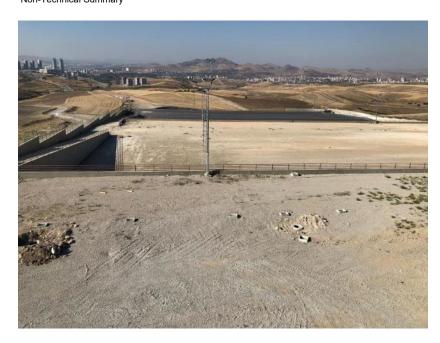
C. Stakeholder Engagement Tracker

Ref No	Name of the Engagement Activity	Stakeholder Category	Stakeholder Sub-Category	Engagement Channel	Type of Engagement	Use of Supporting Materials	Due Date/Targeting Date of Activity	Date of Engagement Activity	Project Representatives or Responsible	Feedbacks	Type of Feedback Delivery	Action	Action Responsible	Additional Notes	Tracking	Status
		Governmental, NGO, Academicians or Community etc.	Sub divisions, NGO based on topics (i.e. Gender Equality, Women, Children, Ageing etc.), Neighbourhood Representatives, Local Communities etc.	Meeting (face to face or online), Interview, Informal and Formal Discussions, Workshops, Disclosure etc.)	One to one, Small group, Large group	Please specify if any supporting document used	dd/mm/yy	dd/mm/yy	Person		e-mail, message, form etc.		Team member accountable for addressing the action		Where document/content/mem o/taken photographs to be stored or incorporated in	Closed, Open, Continuous etc

D. Photos of new depot in Mamak (No.3)



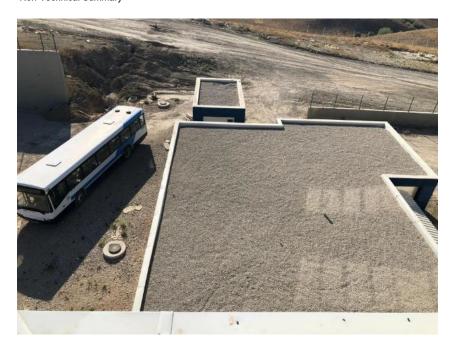








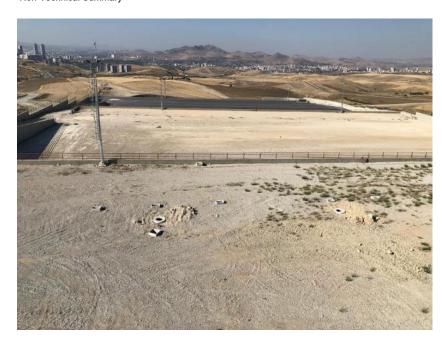




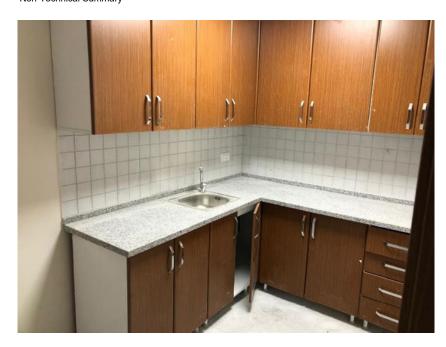




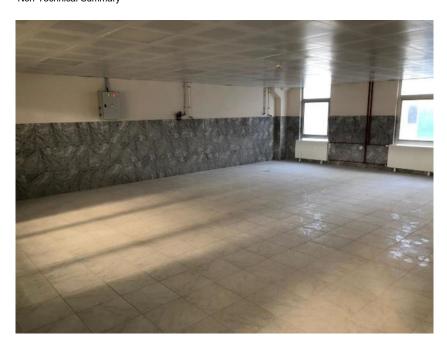




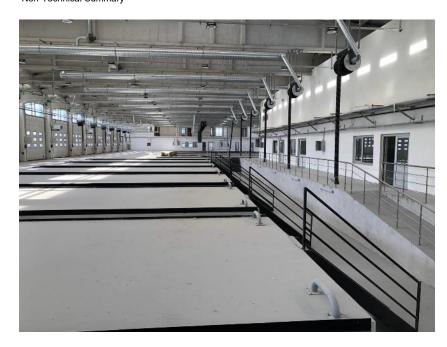














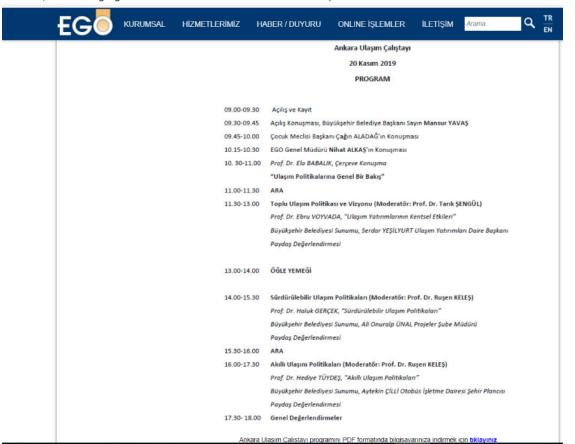
E. Transportation workshop webpages

E.1

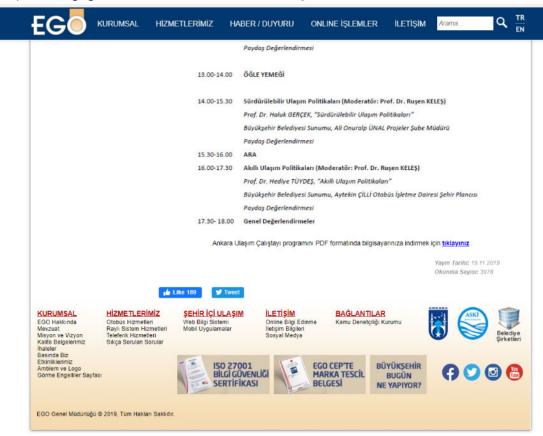
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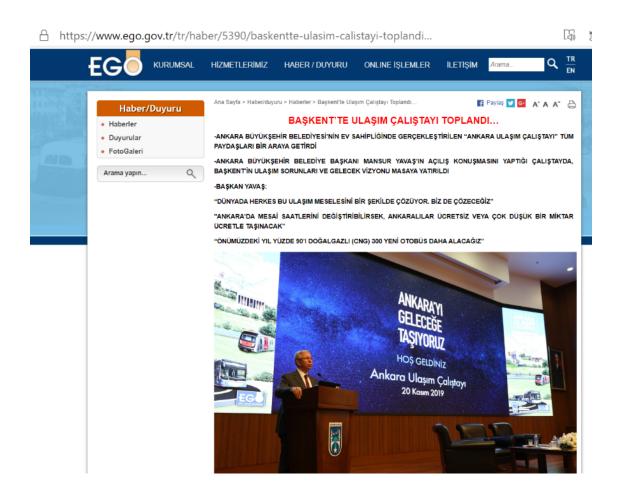


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KURUMSAL

HIZMETLERİMİZ HABER / DUYURU ONLINE İŞLEMLER İLETİŞİM Arama...



Önceliklerimiz arasında yer alan Bisiklet Yolu Projemizde teknik etütlerimiz tamamlanmak üzere. Üç ay gibi kısa bir süre içinde Bisiklet Yolu inşaatına başlayacağız. Avrupa Birliği ve ABD kaynaklı yaklaşık 45 milyon TL hibe bizim için çok önemli bu projede. Bundan sonra finansman yapımıza uygun olmayan büyük kaynak tahsisi gerektiren çılgın projeler olarak adlandırılan ulaşım yatırımlarından çok ihtiyaçlarımıza karşılık veren bir ulaşım politikası ve bir yatırım anlayışına

20 Kasım Dünya Çocuk Hakları Günü'ne denk gelen çalıştayda söz alan Büyükşehir Belediyesi Çocuk Meclisi Başkanı Çağın Aladağ da ulaşım konusundaki görüşlerini dile getirerek, "Trafik kurallarına uyulmaması, hız kurallarının hiçe sayılması, bisiklet yollarının eksikliği, güvenli kaldırım ve alt üst geçitlerinin azlığı biz çocuklar için önemli bir sorun. Bu sorunların çözümü konusunda adımların atılmasını istiyoruz" dedi.



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