



**REPUBLIC OF TURKEY  
MINISTRY OF ENVIRONMENT,  
URBANIZATION AND CLIMATE CHANGE**



# **ILBANK Grievance Mechanism**

for Projects Financed by International  
Financial Institutions

**October 2023**

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## Acronyms and Abbreviations

<b>CIMER</b>	The Presidency's Communication Center
<b>EC</b>	Ethics Committee
<b>E&amp;S</b>	Environmental and Social
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESDD</b>	Environmental and Social Due Diligence
<b>ESF</b>	Environmental and Social Framework
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESMS</b>	Environmental and Social Management System
<b>ESRM</b>	Environmental and Social Risk Management
<b>ESS</b>	Environmental and Social Standards
<b>FI</b>	Financial Intermediary
<b>GBV</b>	Gender-based Violence
<b>GD</b>	General Directorate
<b>GM</b>	Grievance Mechanism
<b>IFIs</b>	International Financial Institutions
<b>IT</b>	Information Technologies
<b>ILBANK</b>	İller Bankası Anonim Şirketi
<b>LMP</b>	Labor Management Procedures
<b>MP</b>	Management Plan
<b>OHS</b>	Occupational Health and Safety
<b>PIU</b>	Project Implementation Unit
<b>PMU</b>	Project Management Unit
<b>PSEA</b>	Protection from Sexual Exploitation and Abuse
<b>RP</b>	Resettlement Plan
<b>RD</b>	Regional Directorate
<b>SEA/SH</b>	Sexual Exploitation and Abuse/Sexual Harassment
<b>SEP</b>	Stakeholder Engagement Plan
<b>UN</b>	United Nations
<b>UNDP</b>	United Nations Development Programme
<b>WB</b>	World Bank
<b>YIMER</b>	The Foreigners Communication Center

# 1. INTRODUCTION

İller Bankası Anonim Şirketi (“**ILBANK**”) is a national state-owned development and investment bank specialized in financing of infrastructure investments of and capacity building for municipalities and municipal utilities in Türkiye. ILBANK is an incorporation affiliated with the Ministry of Environment, Urbanization and Climate Change of the Republic of Türkiye. It was established under and subject to Law No. 6107 (Law on ILBANK) and Law No. 5411 (Banking Law).

In line with Bank’s vision to become a renowned international development and investment bank in the region, ILBANK has been working with the **World Bank (WB)** and other **International Financial Institutions (IFIs)** and bilateral development institutions, including but not limited to, **Japan International Cooperation Agency (JICA)** and **Agence Française de Développement (AFD)**.

ILBANK’s main area of operation covers municipal infrastructure investments including but not limited to water supply and wastewater networks, wastewater and drinking water treatment plants, solid waste management facilities, and other municipal infrastructure investments such as construction and repair of roads and pavements. ILBANK has expanded its sector coverage for municipal financing with new loans from IFIs and is currently also supporting investments and providing technical assistance in renewable energy, transport and urban mobility, social and recreational facilities, preparation of city implementation zoning plans and master plans.

Acting as a **financial intermediary (FI)** for projects financed by **IFIs**, ILBANK, as the **Borrower**, executes **loan agreements** with the IFIs for financing of related **projects** and provides **subproject<sup>1</sup> based** financing to municipalities/municipal utilities (**sub-borrowers**) through **sub-loan agreements**. Within ILBANK, the **Department of International Relations** is authorized and responsible for the financial, technical, procurement, environmental, and social management of the projects financed by IFIs.

ILBANK has a well-established organization at the central and regional levels. Under the General Directorate (GD) based in Ankara, an IFI Credit Risk Unit<sup>2</sup> has been established and functioning under the Department of International Relations. This unit is authorized and responsible for managing the financial, technical, procurement, environmental, and social processes of the projects financed by IFIs.

At the regional level, ILBANK has 18 Regional Directorates (RDs) organized to serve 81 provinces of Türkiye. Each RD serves between one to five neighboring cities in addition to the province where the RD is based. The RDs are staffed with environmental and social (E&S) and occupational health and safety (OHS) personnels.

At the subproject level, ILBANK requires sub-borrowers to maintain sufficient E&S governance structure by establishment of a Project Implementation Unit (PIU) staffed with competent E&S personnel acting as the focal points for ESMS implementation. The sub-borrower PIUs further require the construction supervision consultants and contractors to retain suitably qualified E&S personnel.

**ILBANK** has established an **Environmental and Social Management System (ESMS)<sup>3</sup>** effective as of 24<sup>th</sup> of Dec 2023. The ESMS is aimed at ensuring systematic identification, assessment, management, monitoring, and reporting of the environmental and social (E&S<sup>4</sup>) risks and impacts of **the projects and subprojects financed by the IFIs**. This process will be implemented on an ongoing basis throughout the loan duration of projects in line with the requirements of the national legislation, international agreements and conventions ratified by Türkiye and E&S standards of lending **IFIs** (altogether referred to as “**Reference E&S Standards**”).

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<sup>1</sup> ILBANK “subprojects” refer to projects of municipalities or municipal utilities financed by ILBANK with support from the IFIs.

<sup>2</sup> This is referred to as Project Management Unit (PMU) in ILBANK Projects financed by WB.

<sup>3</sup> Compliant with the WB ESS 9 and other relevant IFI standards applicable to FIs, and in line with the International Finance Corporation (IFC) ESMS Implementation Handbook and Good International Industry Practices.

<sup>4</sup> The acronym E&S refers to all aspects of “sustainability” as encompassed by the International Finance Corporation (IFC) Performance Standards, i.e. environment, social, health and safety, human rights and labor aspects.

Since September 2021, ILBANK has an existing formal Grievance Policy in place (in Turkish and in English). This Grievance Policy is publicly accessible<sup>5</sup> document which has been applicable to all IFI financed projects and subprojects of ILBANK. Through this Policy, ILBANK has intended to establish transparent and comprehensive processes that allow any stakeholder<sup>6</sup>, including project affected people and other interested parties, to file a complaint, raise a concern or problem or provide opportune feedback including wishes and demands regarding the planning, implementation or the management of a project, which are to be promptly responded, evaluated and managed/resolved in a timely manner by the related ILBANK units operating under the Department of International Relations.

The E&S Policy adopted and published<sup>7</sup> by ILBANK under its ESMS in May 2023 and updated in October 2023 commits to management of grievances and feedback received from external stakeholders as well as internal stakeholders (direct and contracted employees) of subprojects financed by ILBANK under IFI funded projects through fair, transparent, accessible, responsive and gender-inclusive processes put in place under the existing Grievance Policy.

Under the ILBANK ESMS, the Grievance Policy of ILBANK has been updated and adapted into a Grievance Mechanism (GM) intended to continue providing external and internal stakeholders including subproject-affected parties with accessible and inclusive means to raise issues and grievances related to subprojects compliant with the Reference E&S Standards.

This Mechanism will secure effective management of the process by the E&S teams of ILBANK GD IFI Credit Risk Unit and RDs with differentiated responsibilities.

It will also ensure active participation of the sub-borrower and contractor staff designated for the collection and management of stakeholder grievances and feedback in line with the subproject-level GMs to be developed by the sub-borrowers.

There are three separate mechanisms defined under this GM, as below:

- GM for Public (Chapter 7)
- GM for Employees (Chapter 8)
- GM for the Management of Sensitive Complaints (Chapter 9)

ILBANK GM also provides for Appeals Mechanisms for the aggrieved public members and employees in ILBANK subprojects in an attempt to resolve the disputed issue through non-judicial processes.

The Mechanism is only applicable to grievances or feedback relating to a current or proposed ILBANK projects or subprojects financed through IFIs and received by ILBANK Department of International Relations IFI Credit Risk Unit staff and/or subproject related staff (i.e. sub-borrowers, construction supervision consultants or subproject contractors).

ILBANK will ensure that the communities in settlements affected by ILBANK subprojects financed through IFIs and the Internal ILBANK staff at the GD and RDs as well as the external consultants involved in ILBANK subprojects are informed about the GM (including their rights to prefer anonymity, rules of confidentiality, procedures to be followed and applicable timeframes, appeals mechanism, etc.) as early as possible during the subproject development and implementation.

Employees working in ILBANK projects and subprojects will be informed about the GM for Employees through the Induction Training to be provided at the time of the recruitment in line with the ILBANK ESMS Training Procedure.

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<sup>5</sup> Disclosed at ILBANK's official website in Turkish (<https://www.ilbank.gov.tr/sayfa/uluslararasi-finansmanli-projeler>) and in English (<https://www.ilbank.gov.tr/sayfa/projects-with-external-financing>)

<sup>6</sup> As per WB ESS10, stakeholder refers to individuals or groups who: (a) are affected or likely to be affected by the project/ subproject (project-affected parties); and (b) may have an interest in the project/subproject (other interested parties). The stakeholders of a project/subproject will vary depending on the details of the project/subproject. They may include local communities, national and local authorities, neighboring projects, and nongovernmental organizations.

<sup>7</sup> <https://www.ilbank.gov.tr/sayfa/ilbank-environmental-and-social-policy>

## 2. OBJECTIVES

The objectives of the ILBANK GM are to:

- To set out the principles and procedures for collection and management/resolution of public and employee grievances and feedback in subprojects financed by ILBANK through IFIs (ILBANK subprojects).
- To provide subproject-affected parties (public or employees) with accessible and inclusive means to raise issues and grievances.
- To facilitate easily accessible mechanisms for ILBANK employees and subproject parties to raise workplace concerns and issues.
- To allow ILBANK to be aware of those issues and grievances respond to and manage in a timely and appropriate manner through systematic approaches.
- To promote good grievance management practices in the ILBANK subprojects.
- To ensure appropriate mechanisms for management of sensitive<sup>8</sup> grievances.
- To increase accountability and accessibility towards the stakeholders of ILBANK.

## 3. SCOPE OF APPLICATION

This GM is applicable in all projects and subprojects of ILBANK financed through IFIs.

It will be accessible to the following parties throughout the loan duration of the IFI financed projects:

- Affected parties who are the beneficiaries of or community members (including disadvantaged and vulnerable individual or groups) affected or likely to be affected by the ILBANK projects and subprojects financed through IFIs
- Internal ILBANK staff at the GD and RDs and external consultants involved in ILBANK projects and subprojects financed through IFIs
- Related project/subproject staff including direct and contracted employees of sub-borrowers, construction supervision consultants, contractors and consultants involved in ILBANK projects and subprojects financed through IFIs
- Other interested parties who may have an interest in ILBANK projects and subprojects financed through IFIs

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<sup>8</sup> **Sensitive complaints** could include the following (not an exhaustive list): **1)** Sexual exploitation and/or any type of abuse by a staff member; **2)** Fraud and/or corruption by a staff member, such as involvement in bribery or misusing funds; **3)** Any action which constitutes a breach of ILBANK code of conduct including staff behavior.

## 4. ELIGIBILITY CRITERIA

Grievances fulfilling the following criteria will be eligible for consideration and management under ILBANK GM:

- Grievances or feedback relating to a current or proposed ILBANK projects or subprojects financed through IFIs and received by ILBANK Department of International Relations IFI Credit Risk Unit staff and/or subproject related staff (i.e. sub-borrowers, construction supervision consultants or subproject contractors).
- Grievances and feedback submitted by communities/people or other interested parties such as governmental authorities, non-governmental organizations, etc. claiming that the subproject has adversely affected or may potentially cause adverse E&S impacts on people or environment.
- Grievances and feedback submitted by internal ILBANK staff or related project/subproject staff (e.g. municipality staff, contractor staff).
- Grievances and feedback encountered/identified by internal ILBANK staff or related project/subproject staff (e.g. municipality staff) who has the responsibility to report inappropriate staff attitude towards a community member or attitude which violates ILBANK's E&S Policy.
- Anonymous grievances and feedback received from any aggrieved party such as affected people or subproject related parties (such grievance and feedback will be eligible for consideration and management under the ILBANK GM and will follow the same process as non-anonymous grievances with, but the aggrieved party/applicant will not have the right to be informed about the outcome of the process in line with this GM).

Any grievance or feedback that is examined by ILBANK and concluded to have been filed fraudulently or maliciously will be ineligible for being managed/resolved through the ILBANK GM.



## 5. KEY PRINCIPLES OF GM

The GM is based on the United Nations (UN) Guiding Principles on Business and Human Rights<sup>9</sup> and aligned with the key requirements and standards of the lending IFIs including but not limited to WB ESS10, United Nations Development Programme (UNDP) Social and Environmental Standards (SES) for Stakeholder Engagement<sup>10</sup> and as applicable others.

The following guiding principles of UN are adopted by ILBANK in the development and implementation of the GM:

- **Legitimate:** Enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes;
- **Accessible:** Being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access;
- **Predictable:** Providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation;
- **Equitable:** Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;
- **Transparent:** Keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake;
- **Rights-compatible:** Ensuring that outcomes and remedies accord with internationally recognized human rights;
- **Enabling continuous learning:** Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms (through regular analysis of the frequency, patterns, and causes of grievances; strategies and processes used for grievance resolution; and the effectiveness of those strategies and processes for improving policies, procedures, etc.).
- **Based on engagement and dialogue:** Consulting the stakeholder groups for whose use they are intended on their design and performance and focusing on dialogue as the means to address and resolve grievances (through engaging regularly with affected stakeholder groups on the design and performance of the grievance mechanism to ensure that it meets their needs, that they will use it in practice, and that there is a shared interest in ensuring its success).

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<sup>9</sup> [https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>10</sup> [https://info.undp.org/sites/bpps/SES\\_Toolkit/SES%20Document%20Library/Uploaded%20October%202016/UNDP%20SES%20Supplemental%20Guidance\\_Grievance%20Redress%20Mechanisms.pdf](https://info.undp.org/sites/bpps/SES_Toolkit/SES%20Document%20Library/Uploaded%20October%202016/UNDP%20SES%20Supplemental%20Guidance_Grievance%20Redress%20Mechanisms.pdf)

In accordance with these principles, ILBANK GM has been designed to;

- Be proportionate to the potential risks and impacts of the subproject, fair, accessible and inclusive.
- Be established as early as possible in subproject development and supported by appropriate human and financial resources.
- Recognize every person's or stakeholders' right to provide feedback or to raise a complaint, whether positive or negative.
- Allow for anonymous complaints to be raised and addressed by all individuals to give the applicants confidence that they will not be retaliated against for raising concerns (any attempt of retaliation against a complainant is considered as misconduct and will be investigated).
- Maintain confidentiality in collecting, reviewing, and handling/resolving all types of complaints and feedback.
- Ensure that handling of grievances is done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the subproject-affected parties.
- Address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all subproject-affected parties, at no cost and without retribution.
- Clearly set out the length of time complainants can expect to wait for acknowledgement, response and resolution of grievances in line with the respective timeframes specified in ILBANK Grievance Mechanism.
- Not prevent access to judicial or administrative remedies and provide an appeals mechanism (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved, where ILBANK, through GD or RD staff, and as required sub-borrower municipalities or municipal utilities may provide mediation as an option where users are not satisfied with the proposed resolution.

## 6. ROLES & RESPONSIBILITIES

ILBANK has a well-established organization at the GD and regional levels. The GD IFI Credit Risk Unit is staffed with qualified in-house E&S experts and external individual E&S consultants. At the regional level, ILBANK has 18 Regional Directorates (RDs) organized to serve 81 provinces of Türkiye.

Acting as a **financial intermediary (FI)** for projects financed by **IFIs**, ILBANK, as the **Borrower**, executes **loan agreements** with the IFIs for financing of related **projects** and provides **subproject<sup>11</sup> based** financing to municipalities/municipal utilities (**sub-borrowers**) through **sub-loan agreements**. Within ILBANK, the **Department of International Relations** is authorized and responsible for the financial, technical, procurement, environmental, and social management of the projects financed by IFIs. Under this Department, an **IFI Credit Risk Unit<sup>12</sup>** has been established for managing the financial, technical, procurement, environmental, and social processes of the projects financed by IFIs.

For the delivery of construction works as per the conditions of the construction tenders and contracts, contractors are commissioned by the sub-borrower municipalities/municipal utilities. Sub-borrowers further appoint construction supervision consultants for the daily supervision and monitoring of construction works of contractors on-site on behalf of the sub-borrowers.

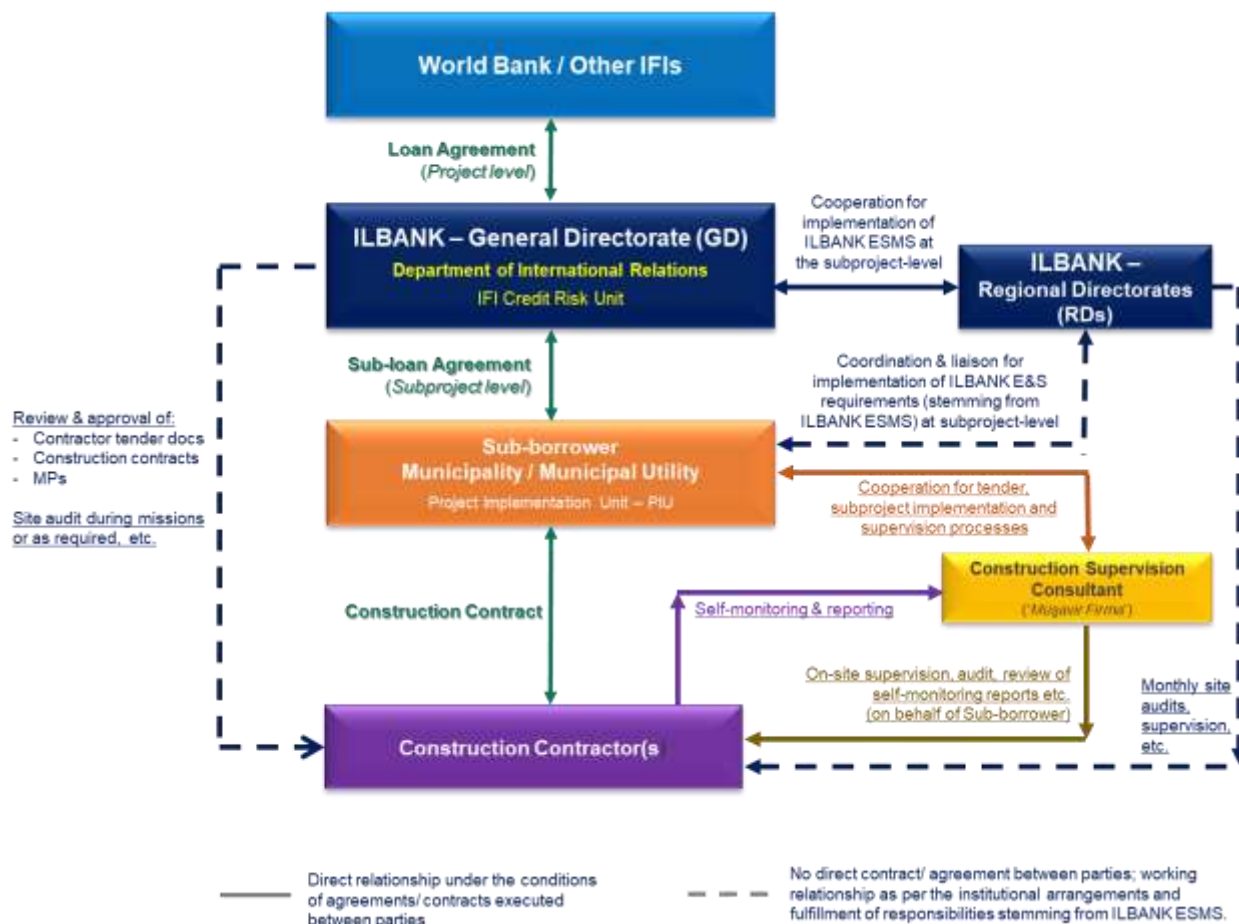
Upon completion of construction works by the contractors, provisional and final acceptance of the subprojects are undertaken, and the sub-borrower municipalities/municipal utilities take over the subprojects for operation in the post final acceptance period throughout the life of the investment.

An overview of the contractual organization in IFI financed projects and subprojects of ILBANK is presented in Figure 1.

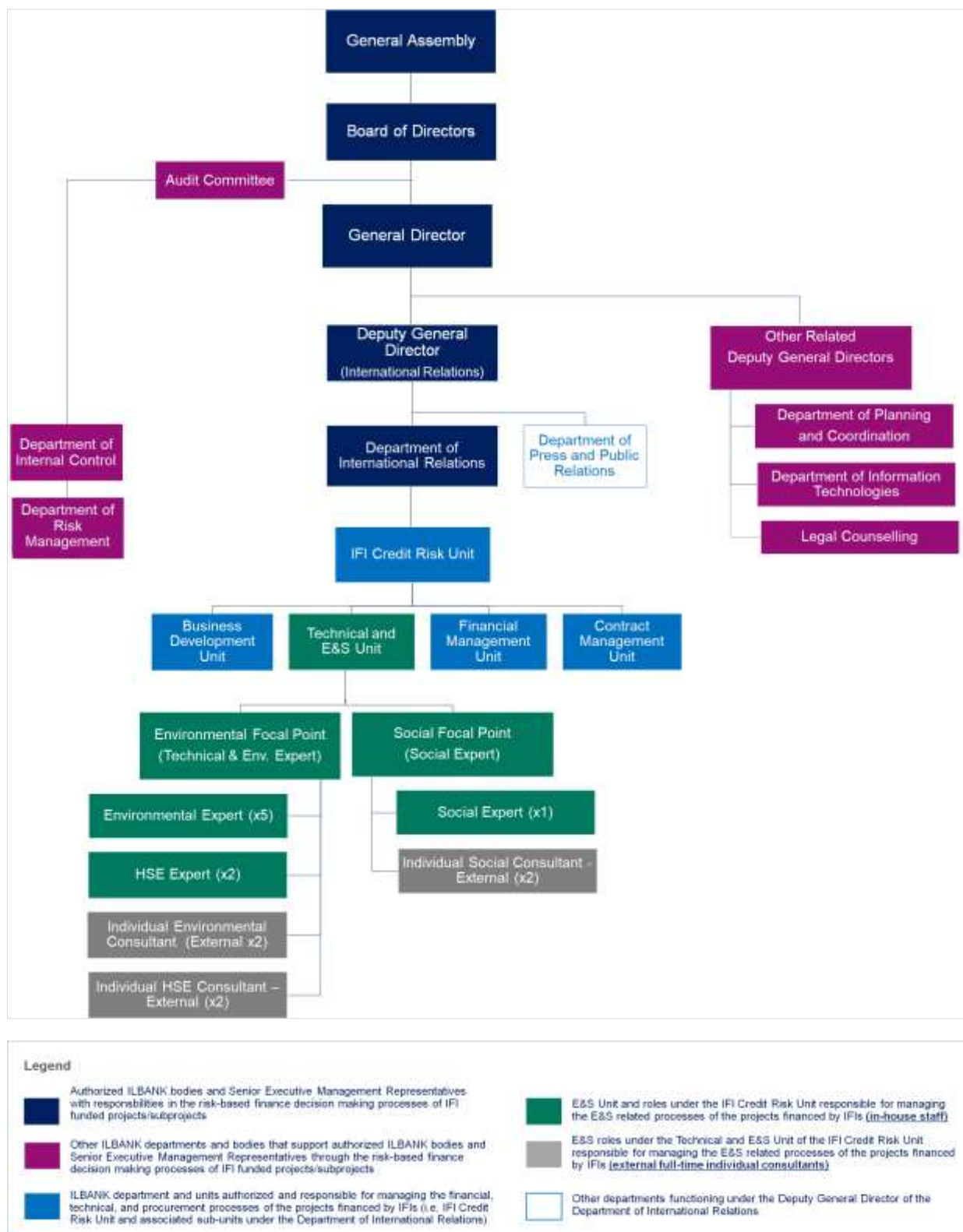
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<sup>11</sup> ILBANK "subprojects" refer to projects of municipalities or municipal utilities financed by ILBANK with support from the IFIs.

<sup>12</sup> This is referred to as Project Management Unit – PMU in ILBANK Projects financed by the WB.



**Figure 1 – Overview of Contractual Organization in IFI Financed ILBANK Projects and Subprojects**



**Figure 2 – ILBANK GD Organogram in relation to Management of IFI Financed Projects**

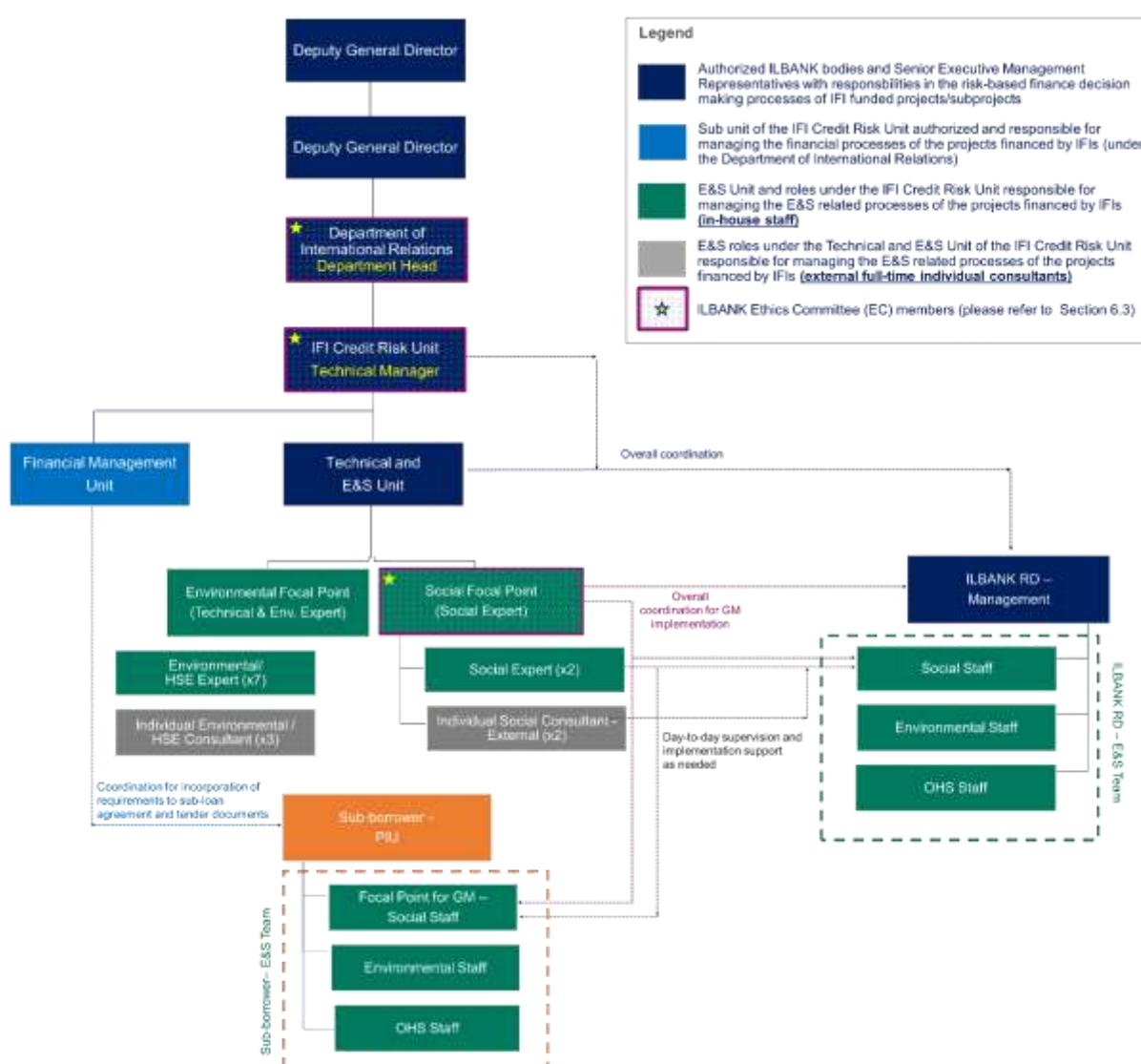
### 6.1. ILBANK GM Team

At ILBANK, both the GD IFI Credit Risk Unit and the RD staff will have differentiated responsibilities for the implementation of GM in projects and subprojects financed through IFIs. Thus, the ILBANK GM Team will consist of staff appointed by the GD and RD. This team will supervise the sub-borrower staff to ensure that the GM related responsibilities specified for the sub-borrowers in Section 6.2 are fulfilled in subproject implementation. The organizational structure of the GM Team is provided in Figure 3.

Under the ILBANK GD organization related to the management of IFI financed projects (as presented previously in Figure 2), the following representatives of the Senior Executive Management will have ultimate authority and responsibility for ensuring effective implementation of the GM in all projects and subprojects of ILBANK financed through IFIs:

- Deputy General Director
- Head of Department of International Relations

Roles and responsibilities of the GM Team of ILBANK for effective implementation of GM by ILBANK GD and RD teams are set out in Table 1. Detailed description of the E&S related roles and responsibilities of the key parties associated with implementation of ESMS are further presented in the ILBANK ESMS Manual.



### Figure 3 – GM Team Organization

**Table 1 – Roles and Responsibilities of ILBANK related to GM Implementation**

Party	Role	Key Responsibilities
<b>ILBANK General Directorate (GD)</b>		
Senior Executive Management Representatives	Deputy General Director	<ul style="list-style-type: none"> <li>• Hold ultimate authority and responsibility for ensuring effective implementation of the GM in all projects and subprojects of ILBANK financed through IFIs</li> <li>• Pre-approve the GM to be disclosed at ILBANK website prior to signing by ILBANK GD</li> <li>• Allocate resources for integration of GM processes and database into software system to developed for management of E&amp;S risks at ILBANK (an Online E&amp;S Risk Management System – ILBANK ESRM System) and necessary training sessions</li> <li>• Ensure that adequate financial and human resources required for maintaining sufficient E&amp;S capacity for effective implementation of GM in place and facilitate associated administrative processes within ILBANK with support from the Head of Department of International Relations</li> </ul>
	Head of Department of International Relations	<ul style="list-style-type: none"> <li>• Hold ultimate authority and responsibility for ensuring effective implementation of the GM in all projects and subprojects of ILBANK financed through IFIs</li> <li>• Review and prioritize the capacity building and resource requirements identified by the ESMS Coordinator (including resources related to GM implementation) and inform the Deputy General Director for consideration and approval of resource allocation</li> <li>• Sign-off the Periodic E&amp;S Performance Reports (including information and analyses on GM implementation by ILBANK) prior to issuing to Lending IFIs</li> <li>• Pre-approve the GM to be disclosed at ILBANK website in consultation with the Deputy General Director</li> <li>• Approve any updates to GM</li> <li>• Support the Deputy General Director in associated administrative processes within ILBANK to ensure allocation of adequate financial and human resources are in place for maintaining sufficient E&amp;S capacity to effectively implement the GM</li> <li>• Ensure that the GM related roles and responsibilities are clearly communicated to all relevant ILBANK personnel under the IFI Credit Risk Unit and to other department managements and staff (i.e. Department of Planning and Coordination, Department of Information Technologies, Legal Counselling) as relevant (as required with support to be requested from the Deputy General Director and IFI Credit Risk Unit – E&amp;S Team)</li> <li>• Act as Ethics Committee (EC) member (see Section 6.3) under the coordination of the Social Focal Point in resolution of sensitive complaints and ensure that grievance closure process for sensitive complaints is carried out as set out in Chapter 9.</li> </ul>
Department of International Relations – IFI Credit Risk Unit	Technical Manager	<ul style="list-style-type: none"> <li>• Coordinate and supervise overall implementation of the project and subprojects at the GD level</li> <li>• Lead coordination among related internal and/or external parties when multi-dimensional or inter-institutional work is required for investigation and/or resolution of grievances</li> <li>• Report the critical E&amp;S issues identified through GM implementation in subprojects to the Senior Executive Management Representatives</li> </ul>



Party	Role	Key Responsibilities
		<p>(such as grievances that may attract media attention, escalation to lending IFIs, business or reputational risks, etc.)</p> <ul style="list-style-type: none"> <li>• Coordinate the integration of the processes under the GM into software system to developed for management of E&amp;S risks at ILBANK (an Online E&amp;S Risk Management System – ILBANK ESRM System)</li> <li>• Act as Ethics Committee (EC) member under the coordination of the Social Focal Point in resolution of sensitive complaints (please see Section 6.3) and ensure that grievance closure process for sensitive complaints is carried out as set out in Chapter 9.</li> </ul>
Department of International Relations – IFI Credit Risk Unit – Technical and E&S Team	Social Focal Point (Social Expert)	<p><u>Pre-implementation:</u></p> <ul style="list-style-type: none"> <li>• Review the subproject-level GMs prepared for each subproject by external consultancy companies/consultants appointed by ILBANK (currently) or municipalities/utilities (in the future) in line with Project with support from RD social staff</li> <li>• Agree with the IFI Credit Risk Unit – Financial Management Team on the GM-related provisions to be included in the sub-loan agreements</li> <li>• Ensure that the GM related requirements applicable to the subprojects are communicated to the applicant sub-borrowers (during ESAP agreement and as required prior to or during the subproject implementation) and advise the sub-borrower on how to structure the subproject to meet E&amp;S requirements of the lending IFIs related to subproject-level GM implementation</li> <li>• Ensure that social requirements incorporated to the tender documents adequately cover the requirements on subproject-level GM implementation</li> </ul> <p><u>Grievance Management/Resolution:</u></p> <ul style="list-style-type: none"> <li>• Hold responsibility and leadership for overall coordination of ILBANK social teams (social experts and individual consultants at the GD and RD staff designated to perform social tasks) to ensure day-to-day management of GM in all projects and subprojects of ILBANK financed through IFIs</li> <li>• Coordinate the social experts and external individual social consultants of the ILBANK GD IFI Credit Risk Unit regarding the GM implementation including supervision and monitoring of sub-borrower staff</li> <li>• As necessary and/or upon request, provide guidance and implementation support to sub-borrowers in developing appropriate measures required to ensure successful resolution of the grievances</li> <li>• Coordinate with the Environmental Focal Point for the management of grievances related to environmental subjects and GM implementation support (including monitoring) that may be required from the environmental and health and safety team</li> <li>• Coordinate staff from other departments (i.e. Department of Planning and Coordination, Department of Information Technologies, Legal Counselling) as relevant to regularly be informed of any feedback or grievance received by them through different platforms (e.g. CIMER, YIMER, social media, etc.), if any (as required with support to be requested from the Head of Department of International Relations)</li> <li>• Inform the Technical Manager and Senior Executive Management Representatives of the GM update requirements outside the periodic (annual) updates</li> </ul>

Party	Role	Key Responsibilities
		<ul style="list-style-type: none"> <li>• Review grievances registered in the database with support from the Social and Environmental Experts periodically and report the critical E&amp;S issues identified through GM implementation in subprojects to the Technical Manager (such as sensitive grievances, any grievance that may attract media attention, escalation to lending IFIs, business or reputational risks, grievances that cannot be resolved within the timeframes defined in this GM, etc.)</li> <li>• Ensure that GM implementation is adequately documented, recorded and stored (as necessary in coordination with other ILBANK teams such as Information Technologies, Department of Planning and Coordination, etc.) observing any applicable requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).</li> <li>• Ensure that grievance logs and database of subprojects are regularly updated with necessary input from RDs</li> <li>• Perform mediation role or designate staff for such role from GD or RDs as required for successful resolution of grievances</li> </ul> <p><u>Management of Sensitive Complaints:</u></p> <ul style="list-style-type: none"> <li>• Coordinate the Ethics Committee (EC) in resolution of sensitive complaints (please see Section 6.3)</li> <li>• Ensure that there is an up-to-date list of related authorities, service providers and support centers associated with the management of sensitive complaints within the subproject databases at all times (related to support of survivors of gender-based violence (GBV), sexual exploitation and abuse/sexual harassment (SEA/SH) at the work place or to support any child affected by potential abuses by people working at service providers and support centers). The list should be continuously updated within the subproject databases at all times</li> </ul> <p><u>Monitoring and Reporting:</u></p> <ul style="list-style-type: none"> <li>• Monitor the GM implementation performance of the subproject activities through desk-based review of grievance log and during consultations to be held during the site visits attended</li> <li>• Conduct non-routine site visits/audits and consultations with the aggrieved parties in case of E&amp;S issues or non-compliances, involving very significant grievances (may be together with or separate from the RD social staff)</li> <li>• Provide GM-related input (including analysis of grievances) to periodic E&amp;S Performance Reports to lending IFIs</li> <li>• Review the GM annually and update as necessary for realignment with substantial changes in the national legislative framework, applicable international E&amp;S policies and standards of IFIs, risk profile of ILBANK's subproject portfolio and other development</li> <li>• Ensure that the ILBANK GD and RD social and environmental staff carry out regular media review to identify any grievances or issues raised (including related social media platforms) associated with the subprojects financed by ILBANK through IFIs and ensure incorporation of key findings into the periodic monitoring reports submitted by ILBANK to lending IFIs</li> </ul>



Party	Role	Key Responsibilities
		<u>Information and Training:</u> <ul style="list-style-type: none"> <li>Ensure that Induction and Refresher training sessions to be delivered to related ILBANK GD and RD staff in line with the requirements under ILBANK ESMS Training Procedure covers the implementation of GM (including function of and communication with the Ethics Committee)</li> <li>Train the RD social staff and sub-borrower teams on GM requirements applicable to the Project as part of ESMS Training Procedure implementation by ILBANK</li> <li>Decide on additional information disclosure and engagement requirements for communicating the subproject-level GMs to relevant external and internal stakeholders</li> </ul>
	Social Experts and Individual Social Consultants	<u>Grievance Management/Resolution:</u> <ul style="list-style-type: none"> <li>Hold responsibility for ensuring day-to-day management of GM, including monitoring, in all projects and subprojects of ILBANK financed through IFIs under the coordination of the Social Focal Point</li> <li>Supervise and provide implementation support to RD social staff as necessary to ensure that grievance logs and databases of subprojects are regularly updated</li> <li>Perform the GM related tasks delegated by the Social Focal Point</li> <li>Carry out regular media review to identify any grievances or issues raised (including related social media platforms) and notify the Social Focal Point about any grievance/issue identified</li> </ul> <u>Management of Sensitive Complaints:</u> <ul style="list-style-type: none"> <li>Ensure investigation and resolution of reported complaints in a timely and acceptable manner as set out in Chapter 9</li> <li>Maintain an up-to-date list of related authorities, service providers and support centers associated with the management of sensitive complaints within the subproject databases at all times (related to support of survivors of gender-based violence (GBV), sexual exploitation and abuse/sexual harassment (SEA/SH) at the workplace or to support any potential child affected by potential abuses by service providers and people working at the support centers)</li> </ul>
	Environmental Focal Point	<ul style="list-style-type: none"> <li>Participate to the activities to be coordinated by the Social Focal Point for the management of grievances related to environmental subjects</li> <li>Ensure that GM implementation support, including monitoring, is given by ILBANK environmental and health and safety team to ILBANK social team as requested by the Social Focal Point</li> </ul>
	Environmental Experts and Individual Environmental Consultants	<ul style="list-style-type: none"> <li>As necessary and under the coordination and supervision of the Environmental and/or Social Focal Points, provide support to the social experts and individual social consultants of ILBANK in performing GM related tasks as part of day-to-day implementation of GM (including monitoring) in all projects and subprojects of ILBANK financed through IFIs</li> </ul>
Department of International Relations – IFI Credit Risk Unit – Financial Management Unit	Financial Management Team	<ul style="list-style-type: none"> <li>Coordinate with the Sub-borrower PIU and Social Focal Point to ensure that social requirements incorporated to the sub-loan agreement and tender documents adequately cover the requirements on subproject-level GM implementation</li> </ul>

Party	Role	Key Responsibilities
<b>ILBANK Regional Directorates (RD)</b>		
ILBANK – RDs	Management	<ul style="list-style-type: none"> <li>Organize monthly monitoring at subproject sites during construction mainly focused on construction progress ensuring participation of RD E&amp;S team</li> <li>Evaluate the capacity building and resource requirements at the RDs for effective implementation of ILBANK GM (as part of ESMS implementation periodically) and report such requirements to the ILBANK GD – IFI Risk Credit Unit as necessary</li> <li>Perform mediation role or designate staff from RDs for such role as required (may be requested by the GD Social Focal Point) for successful resolution of grievances</li> </ul>
	Social Staff	<ul style="list-style-type: none"> <li>Support the GD IFI Credit Risk Unit – social experts in reviewing subproject-level GMs prepared for each subproject by external consultancy companies/consultants appointed by ILBANK (currently) or municipalities/utilities (in the future)</li> <li>Play an active role in consultation and coordination with the GD Social Focal Point in ensuring effective implementation of subproject-level GMs by the sub-borrower and contractor staff</li> <li>Review and verify the veracity and eligibility of the grievances classified as ineligible by the sub-borrowers within the context of their relevance to the subproject related operations based on their knowledge of the regional and local dynamics</li> <li>Participate to the monthly monitoring at subproject sites during construction mainly focused on construction progress to observe social issues including subproject-related grievances, if any</li> <li>Conduct non-routine site visits/audits and consultations with the aggrieved parties in case of E&amp;S issues or non-compliances, involving significant grievances (identified by RDs as part of subproject supervision and monitoring, or if requested by ILBANK GD)</li> <li>Coordinate with the Environmental Staff for the management of grievances related to environmental subjects</li> <li>Carry out regular media review to identify any grievances or issues raised (including related social media platforms) and notify the GD Social Focal Point and/or Social Experts about any grievance/issue identified</li> </ul>
	Environmental & OHS Staff	<ul style="list-style-type: none"> <li>Participate to the activities to be coordinated by the GD Social Focal Point, RD Management or Social Staff for the management of grievances related to environmental &amp; OHS subjects</li> </ul>

## 6.2. ILBANK GM Requirements for Sub-borrowers

As per the requirements of sub-loans, each sub-borrower is required to establish and maintain a Project Implementation Unit (PIU) at the municipality/municipal utility level for their subprojects financed by ILBANK through IFIs.

ILBANK, through the subproject-level ESAPs and E&S covenants incorporated into sub-loan agreements, requires the sub-borrower PIUs to develop subproject-level GMs as part of their SEPs. Sub-borrower PIUs will hold ultimate responsibility for ensuring effective implementation of the subproject-level SEPs including GMs in coordination and collaboration with the construction supervision consultations and contractors involved in construction and/or operation activities as applicable throughout the duration of sub-loans. This will enable receipt and management/resolution of grievances and concerns of subproject-affected parties related to the E&S performance of the subproject in a timely manner.

The subproject-level GMs are required to be aligned with the GM principles set out in Chapter 5 of this document.

In this context, ILBANK, through the sub-loan agreements and subproject-level ESAPs, will require the sub-borrowers to:

- engage with the stakeholders pro-actively towards identifying and addressing issues before they become grievances.
- inform the subproject-affected parties about the grievance process available to them as part of subproject-level SEP implementation.
- maintain a log where grievances are registered in writing and entered into the GM Database that will be integrated to ILBANK ESRM System (software)
- make the grievance logs and associated documentation accessible for review by ILBANK and their consultants as part of E&S monitoring of subprojects if requested.
- appoint qualified staff within the PIUs, who will act as sub-borrower's focal point for GM and be responsible for day-to-day implementation.
- enforce implementation of the GM (for public and employees) by the contractors during site operations including appointment of contractor's focal point for GM.
- provide a separate GM for Employees accessible to personnel of the sub-borrowers, supervision consultants, contractors and consultants involved in subproject-related operations enabling employees to promptly raise subproject-related issues and employers to understand employees needs and to solve concerns, and ensure that all personnel are made aware of the subproject-level GM, grievance submission channels available to them (as part of the Induction and Refresher training sessions to be delivered in line with the requirements under ILBANK ESMS Training Procedure) and function of the Ethics Committee (EC) to raise their work related grievances and concerns, including any sensitive and serious grievances on GBV and SEA/SH.
- inform the subproject-affected parties about the grievance process available to them as part of subproject-level SEP implementation.

ILBANK acknowledges the benefit of continued utilization of existing formal or informal mechanisms (such as White Table<sup>13</sup>) by the sub-borrower municipalities to manage grievances of public where feasible, with supplementary measures provided through the subproject-level grievance mechanisms as required to ensure compliance with the grievance management related requirements of ILBANK.

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<sup>13</sup> All municipalities in Türkiye have adopted a service called Beyaz Masa ("White Table" in English) to collect feedback from citizens. This service aims to provide possible solutions within the municipal structure for the requested concerns. Citizens can access the White Table by calling the Call Center (Alo 153), internet page or in person. There is a tracking number given for each comment/complaint that allows following up the status of the report.

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The training modules to be provided as part of ILBANK ESMS Training Procedure will cover training of E&S teams of sub-borrower PIUs in implementation of ILBANK Grievance Mechanism (including management of sensitive complaints and issues). To this end, trained E&S teams of ILBANK GD and RD will provide training and support to sub-borrowers on how to establish and implement subproject-level grievance mechanisms as soon as subprojects are identified. ILBANK will support the sub-borrowers to build the capacity required for effective implementation of subproject-level grievance mechanisms including utilization of available software as applicable.

Roles and responsibilities of the sub-borrower, construction supervision consultant and the contractor teams at the subproject-level implementation of GMs are set out in Table 2.

**Table 2 – Subproject-level Roles and Responsibilities related to GM Implementation**

Party	Role	Key Responsibilities
<b>Sub-borrowers</b>		
Sub-borrower (municipality or municipal utility)	Sub-borrower Management	<ul style="list-style-type: none"> <li>Ensure that subproject-level GMs are developed (as part of the subproject-level SEPs) and submitted to ILBANK RDs for review and approval, and implemented effectively by sub-borrower and contractor staff</li> <li>Appoint staff (at least one female and one male) who will be responsible from day-to-day implementation of subproject-level GM by sub-borrower and contractor staff</li> <li>Ensure that social requirements incorporated to the contractor tender documents and contracts adequately cover the requirements on subproject-level GM implementation</li> <li>Allocate resource to ensure monitoring of subproject E&amp;S performance (including monitoring of subproject-level GM implementation) and reporting to ILBANK at IFI standards in line with the sub-loan agreement conditions</li> </ul>
	Focal Point for GM (Social staff)	<u>Grievance Management/Resolution:</u> <ul style="list-style-type: none"> <li>Hold responsibility for day-to-day implementation of subproject-level GM by sub-borrower, construction supervision consultant, and contractor staff in line with the principles of ILBANK GM and processes specified in the respective subproject-level GM</li> <li>Review the veracity and eligibility of the grievances received from the public and employees within the context of their relevance to the subproject related operations based on their knowledge of the regional and local dynamics and classify them per their priority and sensitivity</li> <li>Ensure that the eligible grievances are registered, investigated and managed/resolved in line with the GM</li> <li>Notify the ILBANK RD Social Staff about the grievances found ineligible (upon conclusion of ineligibility)</li> <li>Coordinate with the Environmental Staff for the management of grievances related to environmental subjects</li> <li>Ensure implementation of actions by related sub-borrower or contractor staff for the successful management/resolution of grievances in line with the subproject-level GM</li> </ul>

Party	Role	Key Responsibilities
		<ul style="list-style-type: none"> <li>Ensure that grievance logs and database<sup>14</sup> of subprojects (under the related software) are regularly updated with necessary input from construction supervision consultants and contractors; regularly maintain the software and keep it up to date</li> <li>Perform mediation role or designate staff for such role among sub-borrower PIU staff for successful resolution of grievances as required of if requested by ILBANK Social Focal Point</li> </ul> <p><u>Information and Training:</u></p> <ul style="list-style-type: none"> <li>Participate in the training sessions (including GM requirements) to be organized by ILBANK as part of ILBANK ESMS Training Procedure implementation</li> <li>Train the construction supervision consultants, contractors and/or external E&amp;S consultants for collection, registration and management of grievances in line with the subproject-level GM</li> <li>Inform the staff about the function of EC based in in ILBANK GD</li> </ul> <p><u>Monitoring and Reporting:</u></p> <ul style="list-style-type: none"> <li>Undertake periodic monitoring of subproject E&amp;S performance (including GM implementation) and reporting to ILBANK at IFI standards in line with the sub-loan agreement conditions</li> <li>Provide ILBANK with relevant adequate and transparent information on the grievances received by the sub-borrower as part of periodic reporting</li> <li>Allow ILBANK representatives (including individual consultants) to access grievance records.</li> <li>Carry out regular media review to identify any grievances or issues raised (including related social media platforms) related to the subprojects financed by ILBANK through IFIs and include the findings within the periodic reports</li> </ul>
	Environmental & OHS Staff	<ul style="list-style-type: none"> <li>Participate to the activities to be coordinated by the sub-borrower focal point for GM for the management of grievances related to environmental &amp;OHS subjects</li> </ul>
Construction Supervision Consultants ("Müşavir")	Management and E&S staff	<ul style="list-style-type: none"> <li>Carry out the GM-related tasks delegated by the sub-borrowers</li> <li>Ensure sufficient E&amp;S capacity for effective implementation of subproject-level GM developed by the sub-borrowers as set out in the supervision consultancy agreements; appoint staff (at least one female and one male) who will be responsible from day-to-day implementation of subproject-level GM</li> <li>Ensure that the grievance and feedback collection channels defined in ILBANK GM and subproject-level GMs are made available in subprojects</li> <li>Collect any written grievances submitted by the aggrieved parties (applicants) through the available channels (e.g. grievance boxes,</li> </ul>

<sup>14</sup> Confidentiality of the grievances registered in the database will be duly observed throughout all processes. All processes defined in this GM regarding the registration and management of subproject-related grievances and feedback will be undertaken by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

Party	Role	Key Responsibilities
		<p>forms submitted to contractors, etc.) on a weekly basis on behalf of the sub-borrower and deliver these to the sub-borrower's social staff</p> <ul style="list-style-type: none"> <li>• Participate in the training sessions (covering GM requirements) to be organized by sub-borrowers in line with the requirements of ILBANK ESMS Training Procedure</li> <li>• Promptly notify the sub-borrower of any significant subproject-related grievance received from subproject employees or public</li> </ul>
Construction Contractor	Management and E&S staff	<ul style="list-style-type: none"> <li>• Ensure sufficient E&amp;S capacity for effective implementation of subproject-level GM developed by the sub-borrowers as set out in the construction contracts; appoint staff (at least one female and one male) who will be responsible from day-to-day implementation of subproject-level GM</li> <li>• Participate in the training sessions (covering GM requirements) to be organized by sub-borrowers in line with the requirements of ILBANK ESMS Training Procedure</li> <li>• Update the grievance logs and databases of subprojects regularly based on verbal and written grievances received (separately for public and employee grievances)</li> <li>• Provide ILBANK with relevant adequate and transparent information on the grievances received by the contractors as part of monthly reporting</li> <li>• Allow ILBANK (including individual consultants) and sub-borrower representatives (including construction supervision consultants) to access grievance records.</li> <li>• Ensure implementation of actions by related contractor or sub-contractor staff for the successful management/resolution of grievances in line with the subproject-level GM</li> <li>• Promptly notify the sub-borrower of any significant subproject-related grievance received from subproject employees or public</li> </ul>

### 6.3. ILBANK Ethics Committee

The Ethics Committee (EC) is responsible for investigating all sensitive complaints referred by the ILBANK GM Team or other members of the ILBANK GD IFI Credit Risk Unit or RD – E&S teams.

To this end, the complaints including but not limited to the following (noting that this is not an exhaustive list) will be considered sensitive:

- 1) Sexual exploitation and/or any type of abuse by a staff member;
- 2) Fraud and/or corruption by a staff member, such as involvement in bribery or misusing funds;
- 3) Any action which constitutes a breach of ILBANK code of conduct<sup>15</sup> including staff behavior.

The following ILBANK GD staff are the permanent staff members of the EC, who may be supported by other ILBANK GD staff as deemed necessary:

- Head of Department of International Relations
- IFI Credit Risk Unit – Technical Manager
- IFI Credit Risk Unit, Technical and E&S Team – Social Focal Point (Social Expert)

The Social Focal Point will receive training in investigating serious grievances, relevant laws and regulations, and IFI standards including the rights of people who file a grievance.

Once a complaint received is classified as sensitive by the Social Focal Point (Social Expert) the process defined in Chapter 9 for management of sensitive complaints will be followed.

The EC members are independent in terms of conducting investigations. The committee members will have sufficient availability in order to conduct investigations in the stated timeframes. They will also have in-depth knowledge of ILBANK's policies and procedures (such as ILBANK Code of Conduct as included in the Project LMPs, etc.) as well as specific training on how to deal with sensitive complaints.

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<sup>15</sup> As included and published under the Labor Management Procedures (LMP) of each ILBANK Project financed by IFIs. The Code of Conduct published recently under the LMP (January 2023) of the ILBANK Water Circularity and Efficiency Improvement Project (funded by the World Bank) is accessible at: [https://www.ilbank.gov.tr/storage/uploads/uidb/ilbank\\_wceip\\_lmp\\_17012023\\_1685916365.pdf](https://www.ilbank.gov.tr/storage/uploads/uidb/ilbank_wceip_lmp_17012023_1685916365.pdf)

## 7. GRIEVANCE MECHANISM FOR PUBLIC

The GM for Public will be applicable to the communities/people claiming that the subproject has adversely affected or may potentially cause adverse E&S impacts on people or environment.

The key principles and roles and responsibilities defined in Chapter 5 and Chapter 6 are applicable to the GM for Public.

### 7.1. Grievance Redress Procedure

Steps of the ILBANK GM for public are described below. These steps describe how grievances received directly by ILBANK (verbally or in written through the channels described in this GM) in relation to subprojects will be managed.

Subproject-level GMs to be developed by sub-borrowers under their SEPs will adapt the same process and describe how those grievances will be managed at the subproject-level by the sub-borrower PIUs, construction supervision consultants and contractors.

Responsibilities of ILBANK GD and RD staff are described in details in Chapter 6. The following will apply during the ESMS Roll-out and in the Post Roll-out periods of GM implementation by ILBANK.

- During the ESMS Roll-out Period, ILBANK GD IFI Credit Risk Unit – E&S Team will lead the tasks under each step with support by ILBANK RD – E&S teams.
- In the post ESMS Roll-out Period, ILBANK RD – E&S teams trained and got experienced in GM implementation will perform the tasks in consultation with the ILBANK GD IFI Credit Risk Unit – E&S Team. Ideally ILBANK RD personnel will work in close collaboration with the sub-borrower E&S staff to ensure effective implementation of GM at the subproject-level.

Figure 4 provides a summary of the main steps of Grievance Redress Procedure of ILBANK. Detailed description of each step is provided in the remainder of this section.

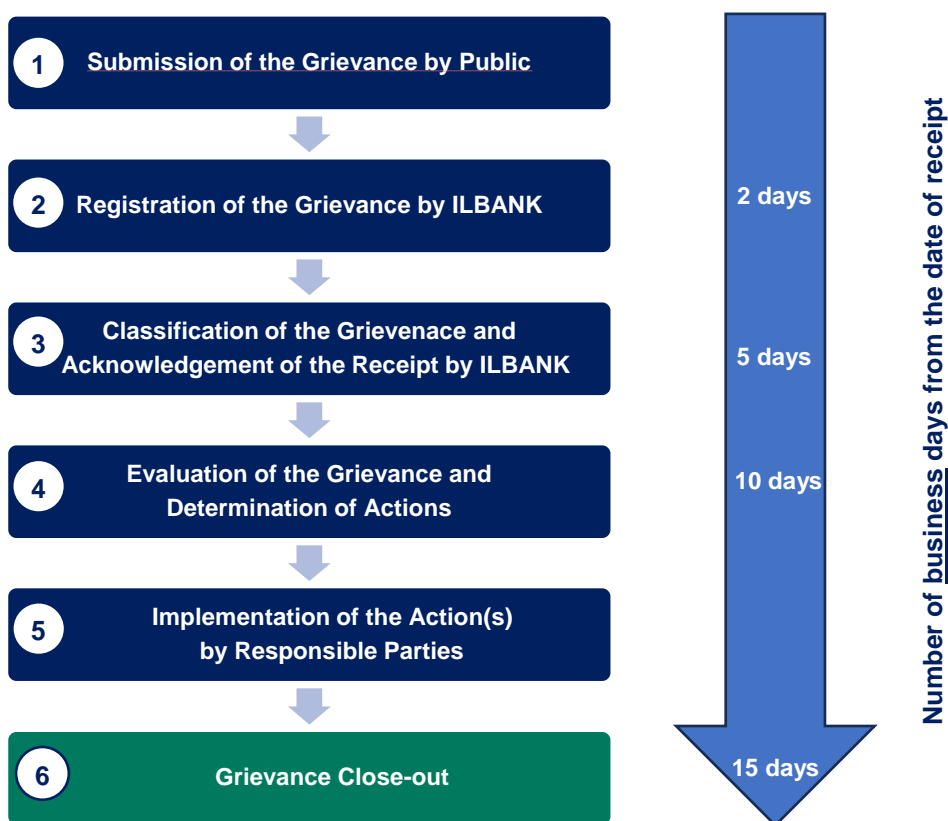


Figure 4 – Grievance Redress Procedure for Public Grievances



Confidentiality of the grievances will be duly observed throughout all processes. All processes defined under following steps regarding the registration and management of subproject-related grievances and feedback will be undertaken by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

The processes defined under each step will in future be integrated into a GM Database which will be integrated to the software system to be developed for management of E&S risks at ILBANK (**online E&S Risk Management System (ESRM System)**). All documentation and records kept throughout the process will be kept in the GM Database. Annex A provides the template for the register as the basis of GM Database.

Within the GM Database, each grievance record will be allocated a unique number reflecting year, sequence and place of received grievance. Grievance records (letter, email, record of conversation, etc.) will be stored together, electronically or in hard copy.

The GM Database will be accessible for use by the ILBANK GD and RD and the sub-borrower focal point for GM.

### **Step 1 – Submission of the Grievance by Public**

Public grievances or feedback in relation to ILBANK subprojects financed through IFIs can be submitted to ILBANK through the channels listed in Table 3.

ILBANK GM provides for submission of the grievances and feedback anonymously if preferred by the aggrieved party. In this case, aggrieved party/applicant will not have the right to receive any feedback and be informed about the outcome of the GM process.

**Table 3 – Grievance and Feedback Submission Channels available to Public**

<b>Receiving Party</b>	<b>Grievance and Feedback Submission Channels</b>	<b>Information</b>
<b>ILBANK GD</b>	Website	<a href="https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi">https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi</a>
	E-mail	<a href="mailto:bilgiuidb@ilbank.gov.tr">bilgiuidb@ilbank.gov.tr</a>
	Phone Number	+90 312 508 79 79
	Official Letter/ Petition	ILBANK Department of International Relations IFI Credit Risk Unit – Technical and E&S Unit (to the attention of Social Focal Point) Emniyet Mahallesi, Hipodrom Caddesi No:9/21 Yenimahalle, Ankara, Türkiye
<b>ILBANK RDs (in 18 province)</b>	E-mail	Available at <a href="https://www.ilbank.gov.tr/iletisim/bolge-mudurlukleri">https://www.ilbank.gov.tr/iletisim/bolge-mudurlukleri</a>
	Phone Number	
	Official Letter/ Petition	
<b>Through the Sub-borrowers</b>	White Table portal of the respective municipality (“Beyaz Masa”)	Disclosed at the website of respective municipality/municipal utility (including channels such as phone number, digital form, etc.); to be provided in subproject level SEP as well
	E-mail	
	Fax Number	
	Official Letter/ Petition	
	E-mail	Disclosed at the website of respective municipality/municipal utility; to be provided in subproject level SEP as well
	Fax Number	
	Official Letter	
	Phone number	Phone number of the sub-borrower’s focal point to be included in the subproject-level SEPs
	In-person	Individual applications at the respective municipality/municipal utility offices (to the PIU – Social Staff)
<b>Through the Construction Supervision Consultants</b>	E-mail	Contact information of the staff appointed (at least one female and one male) for the management of subproject-related grievances will be provided in subproject level SEP
	Phone Number	
	In-person	Individual applications at the consultant offices on-site

Receiving Party	Grievance and Feedback Submission Channels	Information
(to be appointed by the respective sub-borrower in each subproject)		Individual or group meetings at the affected settlements (separately with female and male members of the community if required)
	Grievance boxes and forms	<p>Grievance and feedback boxes and forms will be placed and maintained by the construction supervision consultants (on behalf of the respective sub-borrowers) in all affected settlements and at relevant work sites. The boxes and forms will be placed at one or more of the following locations, as appropriate:</p> <ul style="list-style-type: none"> <li>○ Offices of neighbourhood heads</li> <li>○ Neighbourhood coffeehouses</li> <li>○ Locations where local women gather together and/or women would feel comfortable to visit</li> <li>○ Site offices</li> </ul> <p>Grievance and feedback forms will also be available at the mobile vehicles of construction supervision consultant staff (e.g. community-facing managers and directors, social staff working at subproject sites, etc.)</p>
<b>Through the Contractors</b>	E-mail	Contact information of the staff appointed (at least one female and one male) for the management of subproject-related grievances will be provided in subproject level SEP
	Phone Number	
	In-person	Individual applications at the contractor offices on-site
	Grievance forms	Individual or group meetings at the affected settlements (separately with female and male members of the community if required)
<b>The Presidency's Communication Centre (CIMER)<sup>16</sup></b>		Grievance and feedback forms will be available at the mobile vehicles of contractor staff (e.g. community-facing managers and directors, social staff working at subproject sites, etc.)
	Website	<a href="http://www.cimer.gov.tr">www.cimer.gov.tr</a>
	Phone (Call Centre)	150
	Phone Number	+90 312 525 55 55
	Fax Number	+90 312 473 64 94
	Official Letter	Mail addressed to Republic of Türkiye, Directorate of Communications
<b>Foreigners Communication Center (YIMER)<sup>17</sup></b>	In-person	Individual applications at the community relations desks at governorates, ministries and district governorates
	Website	<a href="http://www.yimer.gov.tr">www.yimer.gov.tr</a>
	Phone (Call Centre)	157
	Phone Number	+90 312 157 11 22
	Fax Number	+90 312 920 06 09
	Official Letter	Mail addressed to Republic of Türkiye, Directorate of Communications
	In-person	Individual applications at the Republic of Türkiye General Directorate of Migration Management

<sup>16</sup> CIMER is a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to project and subproject stakeholders as an alternative and well-known channel for conveying their project and subproject related grievances and feedback directly to state authorities. CIMER will complement the ILBANK GM.

<sup>17</sup> YIMER is a centralized complaint system for foreigners in Türkiye. YIMER will be available to project and subproject stakeholders as an alternative and well-known channel for conveying their project and subproject-related grievances and feedback directly to state authorities. YIMER will complement the ILBANK GM.

## **Step 2 – Registration of the Grievance by ILBANK**

Grievances received by ILBANK through the channels (verbally or in written) described under Step 1 (above) will be registered by the receiving ILBANK GM Team (at the GD or the RD) in the GM Database within maximum **2 business days from the date of receipt** of the grievance or feedback.

This includes any grievance and feedback lodged/conveyed through CIMER and/or YIMER in relation to the subprojects. The grievances submitted through CIMER and YIMER are received by ILBANK GD – Department for Planning and Coordination (this department operating under a deputy general directorate different than the directorate under which the Department of International Relations operate). If the grievance is related to ILBANK subprojects financed through IFIs, Department for Planning and Coordination will forward the complaint to the ILBANK GD – GM Team for management under ILBANK GM ensuring its anonymity and confidentiality. Department for Planning and Coordination will convey the grievance or feedback to the ILBANK GD – GM Team (timeframe for this will be internally agreed between departments as the ESMS becomes effective and reflected in future updates of this document) and ILBANK GD – GM Team will register the grievance in the GM Database within maximum **2 business days from the date of receipt** from the Department for Planning and Coordination.

ILBANK GM will recognize the right of the applicants to request deletion of their personal data from any records or grievances etc. Personal data and records will be protected and kept safe within the database by taking necessary measures to be agreed between the Department of International Relations – IFI Credit Risk Unit, Department of Information Technologies, and Legal Counselling at ILBANK in line with the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016) and used only for the purpose of grievance analysis and resolution. No personal data will be disclosed or reported publicly.

ILBANK will ensure through sub-loan agreements that information on the available channels for submission of the grievance are communicated to public by the sub-borrowers, construction supervision consultants and the construction contractors using methods appropriate to the respective community members (such as through announcements posted on the information boards to be placed in public places, through the settlement heads (mukhtars), group or individual meetings with disadvantaged and vulnerable individuals and groups, etc. as defined in the subproject-level SEPs).

## **Step 3 – Classification of the Grievance and Acknowledgement of Receipt by ILBANK**

Following the registration of the grievance in the GM Database, ILBANK GM Team will assess the eligibility of the grievance, classify the grievance and formally notify the aggrieved party using appropriate methods (such as short message, e-mail, phone call or in-person meeting documented through minutes, etc. as culturally appropriate in the region or as requested by the complainant) to inform that the grievance has been received, confirm that it has been logged correctly, provide feedback on whether or not the grievance is eligible or not for management under GM based on the initial assessment to be done to determine eligibility at this stage (please see Chapter 4 for Eligibility Criteria) and define the timeframe envisaged for actions towards resolution for grievances that cannot be immediately addressed.

Eligible grievances of public will be classified by ILBANK GM Team into one of the three categories specified in Table 4 according to their severity, frequency and sensitivity.

**Table 4 – Classification of Public Grievances**

Category	Description	Responsible Party
<b>Level 1</b>	When a response can be provided <b>immediately</b> and/or ILBANK GM team members and/or sub-borrower focal point have already been working on resolution	<ul style="list-style-type: none"> <li>ILBANK GM Team</li> <li>Sub-borrower focal point for GM</li> </ul>
<b>Level 2</b>	<b>One-off</b> grievances that will <b>not</b> affect the subproject schedule or will <b>not</b> affect the reputation of ILBANK	<ul style="list-style-type: none"> <li>ILBANK GM Team</li> <li>Sub-borrower focal point for GM</li> </ul>
<b>Level 3</b>	Repeated, extensive and high-profile grievances that may <b>jeopardize the subproject or pose reputational risks</b>	<ul style="list-style-type: none"> <li>ILBANK GM Team</li> <li>Sub-borrower focal point for GM</li> <li>External experts to be appointed by ILBANK or sub-borrowers (as necessary)</li> </ul>

If the grievance is not well understood and the eligibility cannot be verified at this step based on the available information, clarification or additional information and supporting documentation/evidence will be requested from the applicant (if appropriate through the sub-borrowers) for further review and consideration. Applicant will be informed accordingly.

The tasks under this step will be completed within maximum **5 business days from the date of receipt of grievance**.

#### **Step 4 – Evaluation of the Grievance and Determination of Actions**

In consideration of the category of the grievance and findings of the initial assessment, a detailed review and evaluation process will be initiated for grievances which cannot be immediately resolved (e.g. due to technical complexities) through the previous step.

Detailed review and evaluation process will involve the following tasks:

- Consultation with the aggrieved party to understand her/his perception and expectations towards the management of the grievance.
- Establishment of an investigation team (e.g. technical teams, E&S teams, third-party specialists if required for complex or sensitive grievances such as subject-matter experts, consultants, accredited laboratories, etc.) if required due to nature and complexity of the issue
- Investigation and analysis of the grievance by the assigned investigation team
- Determination of the actions/action options required for successful resolution based on the investigation findings
- Determination and information of parties responsible for implementation of the action
  - If the grievance is directly related to ILBANK activities, ILBANK GM Team will direct the grievance to the relevant ILBANK departments (at the GD or RD) for action.
  - If the grievance is related to subprojects activities, ILBANK GM Team will direct the grievance to sub-borrowers for management through subproject-level GMs (sub-borrowers will further delegate the actions to contractors if the grievance is stemming from contractor activities). ILBANK will then monitor the resolution process and supervise or provide implementation support to sub-borrowers if required for timely and successful resolution of the grievance.

If the detailed review and evaluation process concludes that the grievance is ineligible to be processed under ILBANK GM (as per the Eligibility Criteria defined in Chapter 4), applicant will be informed immediately and the process under ILBANK GM will not be proceeded further.

The tasks under this step will be completed within maximum **10 business days from the date of receipt of grievance**.

## **Step 5 – Implementation of the Actions by Responsible Parties**

After the evaluation of the grievance and determination of actions in the previous step (Step 4), responsible persons/parties will implement the assigned actions to resolve the grievance within **15 business days from the date of receipt of grievance**.

Person/parties implementing the action will continue communicating and consulting with the aggrieved party throughout this process to ensure that the grievance is resolved to the satisfaction of the applicant. Any communication and consultation held in this process will be recorded in the GM Database, with supporting documentation/evidence on the implemented actions.

If the time required for the implementation of the actions and resolution of the grievance is to exceed this timeframe due to nature or timing of the required action or factors beyond ILBANK's control, aggrieved party will be notified in a timely and agreement of the aggrieved party will be sought for extending the process for redefined timeframe as required for the implementation of the action and resolution. Such agreement will be documented and registered in the GM Database.

## **Step 6 – Grievance Close-out**

Immediately upon completion of the planned actions, aggrieved party (applicant) will be consulted to seek her/his agreement for the closure of the grievance. In case of agreement, the aggrieved party will be informed in writing, where possible mutual agreement will be documented and the grievance will be closed in the GM Database.

If mutual agreement cannot be reached on the closure of the grievance, the applicant will be notified that she/he has the right to apply to other legal remedies (see below section "Right to Appeal"). Such notification will be documented and registered in the GM Database and the grievance is closed in the GM Database.

In case the grievance cannot be successfully resolved due to the nature, timing or technical requirements (e.g. need for surveys, technical assessments, etc.) of the required action within **15 business days from the date of receipt**, the aggrieved party (applicant) will be notified accordingly and agreement will be sought to redefine a mutually suitable timeframe for resolution of respective grievance. Such agreement will be documented and registered in the GM Database with the consent of the applicant.

## **7.2. Appeals Mechanism**

If actions taken on a grievance have not been resolved to the satisfaction of the aggrieved party, ILBANK will suggest initiation of the Appeals Mechanism in consultation with her/him. The objective of this mechanism will be to provide the applicant with the mediation option in an attempt to resolve the disputed issue through non-judicial processes.

**ILBANK GM or subproject level GMs will not prevent access to judicial or administrative remedies.**

As such, having the Appeals Mechanism in place, aggrieved parties still have the right to further pursue external remedies, including legal action, in accordance with the legislation of Türkiye.

The following parties may be included in the Appeals Committee to perform mediation role as appropriate depending on the type and subject of the grievance:

- ILBANK GD Senior Executive Management Representatives
- ILBANK GD IFI Credit Risk Unit, Technical Manager
- ILBANK GD IFI Credit Risk Unit, Technical and E&S Team – Social Focal Point (Social Expert) or as appropriate the RD management and/or social staff in case the disagreement over the resolution of the grievance is between the sub-borrower and the aggrieved party (public)
- Municipality/municipal utility management or PIU staff in case the disagreement over the resolution of the grievance is between the contractor and the aggrieved party (public)

- Third-party experts/representatives from other third-party institutions depending on the nature of the conflict and subject of the grievance (such as heads of the affected settlements, soil experts/agricultural experts from the District Directorates of Agriculture, independent technical or legal experts depending on specifics of the grievance cases, gender experts, etc.).

The Appeals Committee will determine the actions required to be taken for the resolution of the grievance to the satisfaction of both parties and specify the responsible parties. The actions to be advised by the Appeals Committee will be binding for the party responsible to take the action for resolution of the grievance.

Applicants whose grievances could not be resolved through the Grievance Redress Mechanism or Appeals Mechanism or applicants whose grievances contain sensitive issues have always the right to apply to the relevant legal institutions such as:

- Civil Courts of First Instance
- Administrative Court
- Commercial Courts of First Instance
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>)

Processes under the Appeals Mechanism, including any judicial process, will be monitored by ILBANK GM teams.

## 8. GRIEVANCE MECHANISM FOR EMPLOYEES

The GM for employees will be applicable to the following:

- Internal ILBANK staff at the GD and RDs and external consultants involved in ILBANK projects and subprojects financed through IFIs
- Related project/subproject staff including direct and contracted employees of sub-borrowers, construction supervision consultants, contractors and consultants involved in ILBANK projects and subprojects financed through IFIs

The key principles and roles and responsibilities defined in Chapter 5 and Chapter 6 are applicable to the GM for employees.

### 8.1. Grievance Redress Procedure

Steps of the ILBANK GM for employees are described below. These steps describe how grievances received directly by ILBANK (verbally or in written through the channels described in this GM) in relation to subprojects will be managed.

Subproject-level GMs to be developed by sub-borrowers under their SEPs will adapt the same process and describe how those grievances will be managed at the subproject-level by the sub-borrower PIUs, construction supervision consultants and contractors.

Responsibilities of ILBANK GD and RD staff are described in details in Chapter 6. The following will apply during the ESMS Roll-out and in the Post Roll-out periods of GM implementation by ILBANK.

- During the ESMS Roll-out Period, ILBANK GD IFI Credit Risk Unit – E&S Team will lead the tasks under each step with support by ILBANK RD – E&S teams.
- In the post ESMS Roll-out Period, ILBANK RD – E&S teams trained and got experienced in GM implementation will perform the tasks in consultation with the ILBANK GD IFI Credit Risk Unit – E&S Team. Ideally ILBANK RD personnel will work in close collaboration with the sub-borrower E&S staff to ensure effective implementation of GM at the subproject-level.

The procedure, timeframes, confidentiality rules and use of database as defined in Section 7.1 are principally applicable to the GM for employees with the exception of the grievances related to issues/conditions posing material risks to health and safety of the employees or third-parties. Such grievances will be addressed and managed immediately where feasible.

#### Step 1 – Submission of the Grievance by Employees

Employee grievances or feedback in relation to ILBANK subprojects financed through IFIs can be submitted to ILBANK through the channels listed in Table 5.

ILBANK GM provides for submission of the grievances and feedback anonymously if preferred by the employees. In this case, employees will not have the right to receive any feedback and be informed about the outcome of the GM process.

**Table 5 – Grievance and Feedback Submission Channels available to Employees**

Receiving Party	Grievance and Feedback Submission Channels	Information
ILBANK GD	Website	<a href="https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi">https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi</a>
	E-mail	<a href="mailto:etikuidb@ilbank.gov.tr">etikuidb@ilbank.gov.tr</a>
	Grievance boxes and forms	Mailboxes placed (where confidentiality during submission is secured) in ILBANK Department of International Relations
	In-person	Individual applications to the ILBANK GD Senior Executive Management or IFI Credit Risk Unit – Social Focal Point



Receiving Party	Grievance and Feedback Submission Channels	Information
<b>ILBANK RDs (in 18 province)</b>	Website	<a href="https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi">https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi</a>
	E-mail	<a href="mailto:etikuidb@ilbank.gov.tr">etikuidb@ilbank.gov.tr</a>
	In-person	Individual applications to the RD Management or ILBANK GD IFI Credit Risk Unit – Social Focal Point
<b>Through the Sub-borrowers</b>	E-mail, phone number, etc. to be determined by the sub-borrower PIUs in the subproject-level SEPs including GM	To be determined by the sub-borrower PIUs in the subproject-level SEPs including GM Available at <a href="https://www.ilbank.gov.tr/iletisim/bolge-mudurlukleri">https://www.ilbank.gov.tr/iletisim/bolge-mudurlukleri</a>
	In-person	Individual applications at the respective municipality/municipal utility offices (to the PIU Management or Social Staff) or ILBANK GD IFI Credit Risk Unit – Social Focal Point
<b>Through the Construction Supervision Consultants</b>  (to be appointed by the respective sub-borrower in each subproject)	E-mail and phone number to be determined by the sub-borrower PIUs in the subproject-level SEPs including GM and disclosed to employees	To be determined by the sub-borrower PIUs in the subproject-level SEPs including GM.
	In-person	Individual applications to the management or E&S and OHS staff at the site offices.  Individual applications at the respective municipality/municipal utility offices (to the PIU Management or Social Staff) or to the ILBANK GD IFI Credit Risk Unit – Social Focal Point
	Grievance boxes and forms	Grievance and feedback boxes and forms will be placed and maintained by the construction supervision consultants (on behalf of the respective sub-borrowers) at the site offices, work site and/or accommodation and social facilities  Grievance and feedback forms will also be available at the mobile vehicles of construction supervision consultant staff
<b>Through the Contractors</b>	E-mail and phone number to be determined by the sub-borrower PIUs in the subproject-level SEPs including GM and disclosed to employees	To be determined by the sub-borrower PIUs in the subproject-level SEPs including GM.



Receiving Party	Grievance and Feedback Submission Channels	Information
	In-person	Individual applications to the management or E&S and OHS staff of the contractor or construction supervision consultants at the site offices.  Individual applications at the respective municipality/municipal utility offices (to the PIU Management or Social Staff) or to the ILBANK GD IFI Credit Risk Unit – Social Focal Point
	Grievance boxes and forms	Grievance and feedback boxes and forms will be placed and maintained by the construction supervision consultants (on behalf of the respective sub-borrowers) at the site offices, work site and/or accommodation and social facilities  Grievance and feedback forms will also be available at the mobile vehicles of construction supervision consultant staff
<b>The Presidency's Communication Centre (CIMER)</b> <sup>18</sup>	Website	<a href="http://www.cimer.gov.tr">www.cimer.gov.tr</a>
	Phone (Call Center)	150
	Phone Number	+90 312 525 55 55
	Fax Number	+90 312 473 64 94
	Official Letter	Mail addressed to Republic of Türkiye, Directorate of Communications
	In-person	Individual applications at the community relations desks at governorates, ministries and district governorates
<b>Foreigners Communication Center (YIMER)</b> <sup>19</sup>	Website	<a href="http://www.yimer.gov.tr">www.yimer.gov.tr</a>
	Phone (Call Center)	157
	Phone Number	+90 312 157 11 22
	Fax Number	+90 312 920 06 09
	Official Letter	Mail addressed to Republic of Türkiye, Directorate of Communications
	In-person	Individual applications at the Republic of Türkiye General Directorate of Migration Management

## **Step 2 – Registration of the Grievance by ILBANK**

The procedure and timeframes defined under Step 2 in Section 7.1 are principally applicable.

ILBANK will ensure through sub-loan agreements that information on the available channels for submission of the grievance are communicated to employees by the sub-borrowers, construction supervision consultants and/or the construction contractors (whichever is the employer) at the time of the recruitment through Induction Training to be provided as per the ILBANK ESMS Procedure.

<sup>18</sup> CIMER is a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to project and subproject stakeholders as an alternative and well-known channel for conveying their project and subproject related grievances and feedback directly to state authorities. CIMER will complement the ILBANK GM.

<sup>19</sup> YIMER is a centralized complaint system for foreigners in Türkiye. YIMER will be available to project and subproject stakeholders as an alternative and well-known channel for conveying their project and subproject-related grievances and feedback directly to state authorities. YIMER will complement the ILBANK GM.

### **Step 3 – Classification of the Grievance and Acknowledgement of Receipt by ILBANK**

The procedure and timeframes defined under Step 3 in Section 7.1 are principally applicable. Eligible grievances of public will be classified by ILBANK GM Team into one of the two categories specified in Table 6 according to their severity, frequency and sensitivity.

**Table 6 – Classification of Employee Grievances**

<b>Category</b>	<b>Description</b>	<b>Responsible Party</b>
<b>Level 1</b>	When a response can be provided immediately and/or ILBANK GM Team and sub-borrower PIUs – focal point for GM (or construction supervision consultants or contractors on behalf of the sub-borrowers) are already working on a resolution	<ul style="list-style-type: none"><li>• GM Team</li><li>• Sub-borrower PIUs – Focal point for GM or construction supervision consultants or contractors on behalf of the sub-borrowers</li></ul>
<b>Level 2</b>	Repeated, extensive and high-profile grievances that may jeopardize the subproject or pose reputational risks	<ul style="list-style-type: none"><li>• GM Team</li><li>• Sub-borrower PIUs – Focal point for GM or construction supervision consultants or contractors on behalf of the sub-borrowers</li><li>• Ethics Committee</li><li>• External Experts (when necessary)</li></ul>

### **Step 4 – Evaluation of the Grievance and Determination of Actions**

The procedure and timeframes defined under Step 4 in Section 7.1 are principally applicable.

### **Step 5 – Implementation of the Actions by Responsible Parties**

The procedure and timeframes defined under Step 5 in Section 7.1 are principally applicable.

Grievances related to issues/conditions posing material risks to health and safety of the employees or third-parties. Such grievances will be addressed and managed immediately where feasible.

### **Step 6 – Grievance Close-out**

The procedure defined under Step 6 in Section 7.1 is principally applicable.

- If the grievance required to be resolved by the sub-borrower PIU is not resolved within **15 business days from the date of receipt of grievance**, the PIU – Focal point for GM will refer the issue to the ILBANK GD Credit Risk Unit – Social Focal Point, who will work/coordinate relevant parties to address and resolve the grievance and inform the aggrieved employee as promptly as possible.
- If the grievance required to be resolved by the contractor is not resolved within **15 business days from the date of receipt of grievance**, the contractor (or the aggrieved party directly) will refer the issue to the sub-borrower PIU – Focal point for GM, who will work/coordinate relevant parties to address and resolve the grievance and inform the aggrieved employee as promptly as possible.

In case the grievance cannot be successfully resolved due to the nature, timing or technical requirements (e.g. need for surveys, technical assessments, etc.) of the required action within **15 business days from the date of receipt**, the aggrieved party (applicant) will be notified accordingly and seek for redefining a mutually agreed timeframe for resolution of respective grievance. Such agreement will be documented and registered in the GM Database with the consent of the applicant.

## 8.2. Appeals Mechanism

If actions taken on a grievance have not been resolved to the satisfaction of the aggrieved employee, ILBANK will suggest initiation of the Appeals Mechanism in consultation with her/him. The objective of this mechanism will be to provide the applicant with the mediation option in an attempt to resolve the disputed issue through non-judicial processes.

**ILBANK GM or subproject level GMs will not prevent access to judicial or administrative remedies.**

As such, having the Appeals Mechanism in place, aggrieved employees still have the right to further pursue external remedies, including legal action, in accordance with the legislation of Türkiye.

The following parties may be included in the Appeals Committee to perform mediation role as appropriate depending on the type and subject of the grievance:

- ILBANK GD Senior Executive Management
- ILBANK GD IFI Credit Risk Unit, Technical Manager
- ILBANK GD IFI Credit Risk Unit, Technical and E&S Team – Social Focal Point (Social Expert) or as appropriate the RD management and/or social staff in case the disagreement over the resolution of the grievance is between the sub-borrower and the aggrieved party (public)
- Municipality/municipal utility management or PIU staff in case the disagreement over the resolution of the grievance is between the contractor and the aggrieved party (public)
- Third-party experts/representatives from other third-party institutions depending on the nature of the conflict and subject of the grievance (such as independent technical or legal experts depending on specifics of the grievance cases, etc.).

The Appeals Committee will determine the actions required to be taken for the resolution of the grievance to the satisfaction of both parties and specify the responsible parties. The actions to be advised by the Appeals Committee will be binding for the party responsible to take the action for resolution of the grievance.

Applicants whose grievances could not be resolved through the Grievance Redress Mechanism or Appeals Mechanism or applicants whose grievances contain sensitive issues have always the right to apply to the relevant institutions such as:

- Labor Courts
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>)

Processes under the Appeals Mechanism, including any judicial process, will be monitored by ILBANK GM teams.

## 9. GRIEVANCE REDRESS SYSTEM OF LENDING IFI(S)

The IFIs financing ILBANK projects may also have in place grievance redress system.

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

Information on how to submit complaints to the WB's corporate Grievance Redress Service (GRS) is disclosed at <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

Project affected communities or individuals can also raise their grievances to the WB Independent Inspection Panel, which determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints. Information on how to submit complaints to the World Bank Inspection Panel is disclosed at visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## 10. GRIEVANCE MECHANISM FOR SENSITIVE COMPLAINTS

The process for management of sensitive complaints will be initiated by the Ethics Committee (EC) upon classification of complaint by the ILBANK Social Focal Point as sensitive. The roles and responsibilities of the EC are described in Section 6.3.

The aggrieved party has full rights to remain confidential under the Turkish Constitution and has the rights to apply to court (as per Turkish Labor Law No: 4857 and Turkish Civil Code Law No: 4721) at all times.

Sub-borrower staff and subproject employees will be able to communicate directly with the EC (through e-mail) based in ILBANK GD in case of sensitive complaints.

- In case a subproject employee experiences serious mistreatment such as harassment, intimidation, abuse, violence, discrimination or injustice at the workplace, the employee may raise the case, verbally or in writing directly to the Contractor or Construction Supervision Consultant or the Sub-borrower PIUs. If received by the Contractor, it will immediately refer the case to Construction Supervision Consultant and the Sub-borrower PIUs. The Sub-borrower will immediately investigate the case respecting confidentiality and anonymity of the employee.
- In case a direct employee or civil servant of the Sub-borrower has a serious grievance, the staff may directly contact verbally or in writing the Focal Point for GM.
- All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.

For cases related to gender-based violence (GBV), sexual exploitation and abuse/sexual harassment (SEA/SH) at the workplace or for any potential child abuse in subproject implementation/at the subproject sites, the complaint will be directed by the Social Focal Point (based in ILBANK GD) to relevant legal authorities or service providers.

Social experts at the ILBANK GD IFI Credit Risk Unit – E&S Team, social staff at the RDs and sub-borrower PIUs – Focal point for GM will keep up to date lists of such service providers and support centers at all times).

## 10.1. Principles

The core principles guiding the EC's investigation are:

- protection of the alleged victim
- protection of the presumption of innocence of the accused person
- confidentiality
- impartiality
- due diligence

## 10.2. Process

Each investigation will be conducted by at least two members of the EC. If necessary, they will request internal or external consultancy by experts related to the case, keeping in mind the confidentiality requirement for each case. This pool of experts may for example include a workplace gender diversity expert, an Information Technologies (IT) expert, and/or a legal expert. These technical members will either be consulted as advisors or may lead the investigation with the permanent members if required by the case.

Once the investigation is concluded, the final results are discussed within the EC and as necessary with the management staff at relevant ILBANK departments. The sanction process will be aligned with relevant ILBANK guidelines and decisions will be taken by the authorized staff within ILBANK in consultation with the EC representatives.

If a complaint is raised against a member of the EC, this member will have to be replaced by another relevant manager or expert during the investigation and decision process.

- In case the complaint received from related project staff contains sensitive issues, it will be directed by the GM Team to the EC, with assurances of immediate anonymity and confidentiality. The duration of assessment of the worker/staff complaints will be the same as with the external complaints/feedback.
- If a complaint is raised against a member of the GM Team, this member will have to be replaced by another relevant manager or expert during the investigation and decision process.

## 10.3. Timeframes

The EC will convene within **48 hours of the receipt of a sensitive complaint**. In cases related to child abuse or SEA/SH, it will be immediately directed to the legal authorities such as Ministry of Family and Social Services and Prosecutors Office. The on-going process will be monitored by the EC and reported in the Grievance Register software in a confidential manner.

If the issue may constitute a criminal offence, the EC has the responsibility to immediately refer the case to the relevant public authorities. However, an internal investigation will be conducted in parallel in order to gather evidence about whether or not the allegations are well founded.

The GM Team conducts proceedings together with the EC on the progress of the investigation and informs the community member(s) regularly. Initial investigation for sensitive complaints will be completed in **5 business days** by the Ethics Committee, and a full investigation will be completed within a month at the latest.

## 11. MONITORING AND REPORTING

### 11.1. Monitoring

Effectiveness of the GM implementation and compliance of the implementation with ILBANK commitments will be monitored and evaluated by the Social Focal Point at ILBANK GD – IFI Credit Risk Unit, Technical and E&S Team, with support from social and as necessary environmental experts.

ILBANK GM Team will periodically monitor the E&S performance of financed activities throughout their sub-loan duration (covering the construction and operation phases of the subprojects throughout the financing life cycle). This is to provide information on key E&S aspects of subproject implementation, including GM implementation performance, to enable ILBANK evaluate the success of the E&S management as part of subproject supervision, ensure identification and correction of any non-conformities with the national legislation and the E&S requirements of lending IFIs, provide for early detection of conditions that require specific management strategies and enable technical assistance and supervision when needed.

The frequency of E&S monitoring during construction and operation phases of the subprojects depending on their E&S risk categories are described in the ILBANK Supervision, Monitoring and Reporting Procedure.

Key monitoring indicators will include but not be limited to the following (separately for public and employee grievances):

- Number of grievances per ILBANK projects and subprojects
- Number of grievances per subject of grievances/feedback (e.g. noise, dust, damage to land, expropriation, traffic, health and safety)
- Number of grievances/feedback per party whose activities are the cause of grievances/feedback (e.g. ILBANK, sub-borrower, contractor, etc.)
- Number of grievances/feedback per settlement
- Number of grievances/feedback per actual status (closed, open, ongoing)
- For open and ongoing grievance, information on the status of implementation of actions
- Trends in grievances/feedback over time
- Average duration of grievance resolution
- Recommendations/strategies to prevent or limit future recurrences in the respective subproject and/or in all ILBANK subprojects.

Besides the periodic E&S monitoring to be carried out by ILBANK and the sub-borrowers, subprojects may be subject to routine or non-routine document reviews and/or site visits by the governmental authorities<sup>20</sup> lending IFIs or other third-party stakeholders, for which the procedures are not covered in this ILBANK GM but may include monitoring of GM implementation in subprojects

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<sup>20</sup> According to the Article 18 of the Environmental Impact Assessment (EIA) Regulation of Türkiye, Ministry of Environment, Urbanization and Climate Change (MoEUCC) monitors, checks and inspects the fulfilment of commitments contained in the EIA Report (that is the basis for the “EIA Positive” decision) or Project Information File (PIF) (that is the basis for the “EIA not required” decision) of the projects for which “EIA Positive” or “EIA not required” decision has been issued. The Regulation further requires the project proponents to have Project Progress Report prepared by competent institutions/organizations, which are authorized by the MoEUCC and had not been involved in the preparation of project’s EIA Report, submit the reports to the MoEUCC through the electronic system of the Ministry and present the reports to the MoEUCC during audits. In case it is identified that the project that secured “EIA Positive” or “EIA not required” decision does not comply with the commitments contained in the EIA Report or PIF of the project, MoEUCC/Provincial Directorate of the MoEUCC grants a one-off grace period of one year for ensuring compliance with the project commitments. In case the compliance is not ensured within this period, the investment is ceased until the liabilities are fulfilled. Relevant provisions of the Environmental Law (Law No. 2872) of Türkiye are enforced.

## 11.2. Reporting

As set out in the ILBANK E&S Supervision, Monitoring and Reporting Procedure, based on the outcomes of the subproject monitoring activities to be undertaken, ILBANK GD IFI Credit Risk Unit – E&S Team, will submit periodic reports to the following external and internal stakeholder on the implementation of its ESMS including the E&S procedures. These periodic reports will, *inter alia*, include a summary of the GM implementation in subprojects financed by ILBANK through IFIs:

- Periodic E&S Performance Reporting to Lending IFI(s)
- Periodic E&S Progress Reporting to ILBANK Senior Executive Management
- Periodic Reporting to Public

ILBANK E&S monitoring and reporting requirements for sub-borrowers are defined in the ILBANK E&S Supervision, Monitoring and Reporting Procedure. The periodic E&S monitoring reports to be submitted by the sub-borrowers to ILBANK will also cover, *inter alia*, key information on the the GM implementation in subprojects financed by ILBANK through IFIs.

The reports will only include information regarding the grievances as much as necessary, and any personal information on the individuals having used the GM will remain confidential and will never be shared in these reports.

In particular, periodic E&S Performance Reporting to Lending IFI(s) will:

- Provide information on the progress with ILBANK GM implementation based on the monitoring of key indicators listed in Section 10.1 (including implementation of GM at the subproject-level by the sub-borrowers, supervision consultants and contractors).
- Provide a statistical and qualitative analysis of grievances and feedback for understanding the trends and planning of the corrective actions and precautionary measures in ILBANK projects and subprojects financed through IFIs.
- Serve as a learning tool for the improvement of the quality of ILBANK projects and subprojects financed through IFIs.

Details of the periodic reporting, including the content and frequency of each report are provided in the ILBANK E&S Supervision, Monitoring and Reporting Procedure.

## 12. ADAPTATION PROCESS

The GM has been prepared by the ILBANK GD IFI Credit Risk Unit – E&S team and approved by the Technical Manager. It comes into force after signature of the Head of Department of International Relations and the Deputy General Director.

The GM will be accessible to all stakeholders in English and in Turkish, at the website of ILBANK Department of International Relations, which will enable access for external users as well as ILBANK staff.

A summary of this GM will be communicated to all stakeholders in the most accessible and clear way through appropriate communication methods.

These methods will be as follows:

- Disclosure at ILBANK website
- Brochures and leaflets
- Face to face meetings
- Internal memorandum within ILBANK GD Department of International Relations for ILBANK staff members and related RD staff
- Internal memorandum within sub-borrower PIUs for sub-borrower staff members
- E-mail

All ILBANK staff will be introduced to the GM via Induction Training. ILBANK GD IFI Credit Risk Unit – E&S team and the relevant RD staff, who will be in charge of the implementation of the GM will receive additional training in line with the ILBANK ESMS Training Procedure to manage, monitor and sustain this mechanism.

Sub-borrower PIU Staff in charge of the implementation of the GM will also receive related training in line with the ILBANK ESMS Training Procedure.



## ANNEXES

## Annex A – GM Database (to be integrated into software)

<b>Date of Last Revision</b> (Son Revizyon Tarihi)	
<b>Person who made the Last Revision</b> (Son Revizyonu Yapan Kişi)	

[illegible]

Part B. Information on the Grievance/Feedback Şikayet/Geri Bildirim ile ilgili Bilgileri					
B.1. Grievance / Feedback Description (Şikayet / Geri Bildirimin Tarifi)					B.2. Need for Follow-up Action (Aksiyon Gerekliliği)
Type of Grievance / Feedback (such as Grievance, Comment, Recommendation, Request, Question) Geri Bildirimin Tipi (Şikayet, Yorum, İstek, Soru)	Party whose activities Have Caused the Grievance / Feedback (such as ILBANK, Municipality, Municipal Utility, Construction Contractor, Sub-contractor, Third-party, etc. Faaliyetleri Şikayete Neden Olan Taraflar (örn. ILBANK, Belediye, İdare, İnşaat Yüklenicisi, Altyüklenicisi, Üçüncü Taraflar)	Subject of the Grievance / Feedback Geri Bildirimin Konusu	Location of Grievance / Feedback Received Şikayet / Geri Bildirim in Alındığı Yerleşim	Detailed Description of the Grievance/ Feedback Şikayet/Geri Bildirimin Detaylı Tarifi	Is Grievance Resolved through Immediate Action or Is Follow-up Action Required? Şikayet Derhal Alınan Aksiyonlar ile Çözüme Ulaştı mı yoksa İlave Aksiyon Gerekli mi?

Part C. Follow-up Actions Taken/To be Taken Alınan/Alınacak Aksiyonlar							
C.1. Description of the Action (Aksiyonun Tarifi)					C.2. Completion Date for Action (Aksiyon Tamamlanma Tarihi)		
If required, Corrective Action to be taken Gerekmesi halinde Alınacak Düzeltici Aksiyon	Responsible Party for the Action Aksiyondan Sorumlu Taraf	Responsible Party (for implementation) Aksiyonun Alınmasından Sorumlu Taraf	Name of the Responsible Person for the Action Aksiyonun Alınmasından Sorumlu Kişi	Position of the Responsible Person for the Action Aksiyonun Alınmasından Sorumlu Kişinin Pozisyonu	Proposed Due Date for Completion of Action Aksiyonun Önerilen Tamamlanacağı Tarihi	Action Status Aksiyonun Durumu	Actual Completion Date for Action Aksiyonun Gerçek Tamamlandığı Tarihi

Part D. Grievance/Feedback Closure (Şikayetin/Geri Bildirimin Kapatılması)					
D.2. Closure Details (Kapanış Detayları)				D.2. GM Database Integration	
Status of the Grievance/ Feedback <i>Şikayet/Geri Bildirimin Durumu</i>	Name of the Party who Confirmed Closure of the Grievance/ Feedback in the Database <i>Şikayet/Geri Bildirimin Kapatıldığını Teyit Eden Proje Personeli</i>	Date the Stakeholder has been Notified/Consulted on the Closure <i>Paydaş Şikayet/Geri Bildirimin Kapatıldığına Dair Bilgilendirildiği/İstişare Yapıldığı Tarih</i>	Toplam Şikayet/Geri Bildirim Kapanış Süresi (in days) <i>Total Feedback/Grievance Closure Duration (gün olarak)</i>	Does the Stakeholder Agree with the Closure of the Grievance/Feedback? <i>Paydaş Şikayet/Geri Bildirimin Kapatılması Konusunda Mutabık mı?</i>	Related / Supplementary Documents to be Registered in the GM Database regarding the Closure <i>Kapanış ile İlgili Veritabanına Yüklenecek Destekleyici Dokümanlar</i>

E. Overdue Grievances (Süresi İçerisinde Kapatılamayan Şikayetler)		
E.1. Reason for Overdue Closure <i>Kapatılmadı ise Nedeni</i>	E.2. Proposed New Due Date for Action Completion	E.3. Does the Aggrieved Party Agree with the Proposed New Due Date? If not, please provide brief information on stakeholder feedback <i>Şikayet sahibi taraf yeni önerilen aksiyon tamamlanma tarihi ile mutabık mı? Değilse, paydaşın geri bildirimi hakkında kısaca bilgi veriniz.</i>

F. Appeals Mechanism (İtiraz Süreci)
Please describe if the Appeals Mechanism has been initiated internally by ILBANK (İLBANK tarafından dahili itiraz süreci başlatıldı ise bilgi veriniz)



**REPUBLIC OF TURKEY  
MINISTRY OF ENVIRONMENT,  
URBANIZATION AND CLIMATE CHANGE**



**ILBANK**  
CONSTRUCTIVE POWER OF TURKEY

## **Department of International Relations**

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