

Action Document for EU Trust Fund
to be used for the decisions of the Operational Board

1. IDENTIFICATION

Title/Number	Enhanced support to refugees affected by the Syrian and Iraqi crises in Turkey	
	Facility/Trust Fund priority areas: Health and Social-Economic Support	
Total cost	Total estimated cost: EUR 10,000,000 Total amount from the Trust Fund: EUR 10,000,000	
Aid method / Method of implementation	Project Approach: Direct management – Grant	
DAC-code	43010 (Includes: 11230 12261 11330 15170 15180 16010)	Multisector aid (Includes: Basic life skill for youth and adults Health education Vocational training Women’s equality organisations and institutions Ending violence against women and girls Social/ welfare services)

2. RATIONALE AND CONTEXT

The EU Regional Trust Fund in response to the Syrian crisis (Madad Fund) defines its overall Objective as *to provide a coherent and reinforced aid response to the Syrian crisis on a regional scale, responding primarily to the needs of refugees from Syria in neighbouring countries, as well as of the communities hosting the Refugees and their administrations, in particular as regards resilience and early recovery*".

In addition, the Facility for Refugees in Turkey (Facility) with a total commitment of EUR 3 billion for 2016 and 2017 provides for a joint coordination mechanism, designed to ensure that the needs of refugees and host communities in Turkey are addressed in a comprehensive and coordinated manner. As defined by the Facility Steering Committee on 12 May 2016, the Facility focuses on six main priorities for support, humanitarian assistance, education, migration management, health, municipal infrastructure, and socio-economic support. The Action corresponds to the priority areas of *health* and *social-economic support*.

This Action will contribute to Madad Fund Specific Objectives 3 *to mitigate the destabilising effects of the refugee crisis* and 4 *to increase access to quality and equitable health care for refugees and impacted local populations through direct interventions and through bolstering national systems and capacities*. The Action will report towards 3.2 and 4.2 of the current Result Framework¹.

¹ https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/eutf_Madad_results_framework.pdf

2.1. Summary of the action and its objectives

In line with the '*Strategic orientation document for the European Union Regional Trust Fund in response to the Syrian crisis*', the **Overall Objective** of the Action is to support refugees affected by the Syrian and Iraqi crises.

The **Specific Objectives** are to :

- enhance the protection mechanism and promote integration for refugees and asylum seekers affected by the Syrian and Iraqi crises in Turkey, with a particular focus on Iraqi refugees;
- strengthen the capacity of local authorities to deal with refugees in Turkey.

2.2. Context

2.2.1. Country context

With around 3 million persons, Turkey is currently the country hosting the largest number of Syrian refugees² in the world. The EU has recognised Turkey's generous response to the Syrian refugee crisis since 2011 by mobilising EU Assistance to Syrians and host communities mostly affected by this migration flow, in particular the Facility³.

At the same time, in the latest years Turkey has witnessed a steady increase in the number of Non-Syrian asylum-seekers due to the violence in Iraq and its neighbouring countries. With continued instability of Turkey's neighbour Iraq leading into the fall of Mosul – Iraq's second largest city – into the hands of Da'esh, displacements from Iraq to Turkey increased in 2014.

The impact of these refugee flows in the host communities is significant, with the caveat that many citizens often have little knowledge and interaction with non-Syrian refugees, while confusing them with Syrians and other nationalities. The general assumption is that their situation is the same or similar to those of Syrians, without taking into account that they may be covered by different protection frameworks and face different needs. In this sense, many municipalities hosting Non-Syrian refugees did not pay dedicated attention to this group and made limited investments targeting their wellbeing and integration.

2.2.2. Sector context: policies and challenges

Legal Framework

The legal framework providing protection to refugees and asylum seekers in Turkey is regulated by the *Law on Foreigners and International Protection* (the Law), which came into force in April 2014. The Law established the Directorate General for Migration Management (DGMM) under the Ministry of Interior as the authority responsible for foreigners and international protection within Turkey.

Although Turkey ratified the 1951 Convention, it kept geographical limitations which gives *refugee* status only to asylum seekers arriving from Europe (defined as Council of Europe Member States). This means that asylum seekers from beyond do not enjoy protection in Turkey through the 1951 Convention.

² Since Turkey maintained the 'geographical limitation' when it ratified the 1967 Protocol Relating to the Status of refugees, the Syrian refugees referred to in this document shall be understood as Syrians under Temporary Protection as stipulated in the Law on Foreigners and International Protection.

³ https://ec.europa.eu/neighbourhood-enlargement/news_corner/migration

Under the Law, *Temporary protection* is given *prima facie* to all persons coming from Syria without going through the typical asylum and status determination process. They are referred to as Syrians under Temporary Protection (SuTP). The rights granted to SuTP -whether they are residing in or out of the camps- include a range of rights, services and assistance including access to health, education, social assistance and access to the labour market.

People from other countries of origin, including Iraqis, can only apply for international protection status and usually receive two types of status: *conditional refugee*, a form of temporary protection with the perspective to be resettled to a third country, or *subsidiary status*. They are referred to as *applicants of international protection* or more commonly as 'non-Syrians'.

Registration

DGMM is mandated as the sole authority responsible for determining the status of refugees arriving to Turkey. However, due to the large caseload, a parallel process of status determination of refugees has been established.

In accordance with an unofficial agreement between the Turkish Government and UNHCR, registration of newcomers is done by the Association for Solidarity with Asylum Seekers and Migrants (ASAM) in its headquarters in Ankara on behalf of UNHCR. ASAM is a non-profit humanitarian, non-governmental organization concerned with refugee, asylum seekers and internally displaced persons regardless of race, religion, nationality or political conviction. It is the only NGO in Turkey mandated to carry out the registration of non-Syrian refugees.

As of 28 February 2017, the number of international protection applicants and asylum seekers in Turkey according to UNHCR statistics are as follows⁴:

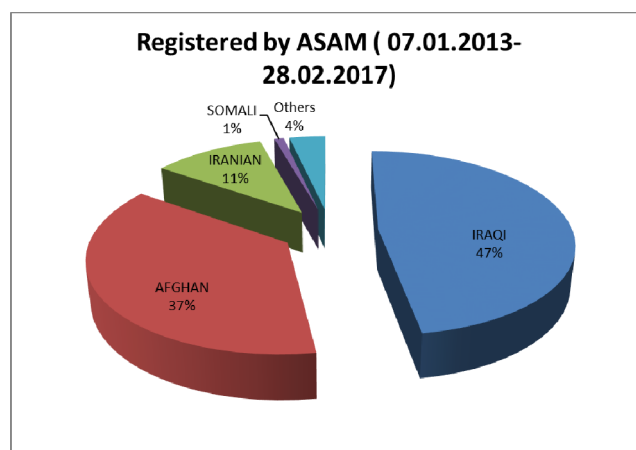
Registered active caseload breakdown by gender and age as of 28.02.2017											
Country	0-4		5-11		12-17		18-59		60+		Total
	F	M	F	M	F	M	F	M	F	M	F/M
Iraq	6.272	6.666	11.613	12.595	7.137	8.347	30.915	44.712	2.262	2.123	132.642
Afghanistan	4.212	4.550	7.509	8.649	4.740	6.822	22.218	62.533	740	964	122.937
Iran	707	762	1.296	1393	793	1064	9.585	16.140	214	195	32.149
Somalia	87	112	201	217	205	215	1.302	1.152	49	41	3.581
Other	240	261	362	414	230	267	2.899	3.369	110	128	8.280
Total F/M	11.518	12.351	2.0981	23.268	13.105	16.715	66.919	127.906	3.375	3.451	
Total	23.869		44.249		29.820		194.825		6.826		299.589

⁴ UNHCR Turkey Website: [http://www.unhcr.org/turkey/uploads/root/eng\(71\).pdf](http://www.unhcr.org/turkey/uploads/root/eng(71).pdf)

The data below shows the ASAM registration statistics between January 2013 and February 2017.

Registered by ASAM by Nationality (January 2013-February 2017)	
Iraqi	164.658
Afghan	128.682
Iranian	37.834
Somali	3.204
Others	12.189
Total	346.567

Source: ASAM Registration Unit



Referral

After having been registered by ASAM, newcomers are referred to certain satellite cities⁵ pending the decision on their application and search for durable solutions. There, they are being registered by the Provincial Directorate of Migration Management (PDMM) which issues an ID card for each individual legalizing their stay in Turkey. Before the significant surge in the number of asylum seekers from Iraq in 2014, Iraqis in Turkey were mostly located in Central Anatolian satellite cities as the number of open cities was limited. Currently, 62 Satellite cities are open for non-Syrian refugees.

Resettlement / Return

The protection regime in Turkey for non-Syrian refugees only foresees a temporary stay and does not include a policy for long term integration. However, the situations in the countries of origin of the largest refugee groups remain volatile and not conducive to return. Therefore, solely resettlement and return are accepted as durable solution for non-Syrian refugees.

UNHCR Turkey is tasked with resettling non-Syrian refugees. The process begins with UNHCR who identifies, interviews and submits refugee cases to countries for resettlement consideration. However, the time needed for being considered for resettlement is normally quite long, it can take up to several years since the current resettlement quotas allocated to Turkey do not seem to reflect the actual needs. In 2016, UNCHR processed 28.915 individuals for resettlement, 9.355 of them Iraqis. Out of this number, 8.500 were accepted by the US. However, the latest policy changes in the US may have an impact on future figures.

Also the return perspective of non-Syrian refugees must be described as very slim. Even if the military campaign for Mosul (and Nineveh) maybe successfully concluded in 2017, a lasting political consensus encompassing the Iraqi society is not yet secured. This leaves many Iraqis inside and outside the country in perilous situations and depending on external assistance for their needs.

Moreover, the challenge remains to integrate into Turkish society as much as possible and within the legal framework. Non-Syrians receive less protection advantages and are less targeted by international aid as compared to Syrian refugees. The focus on resettlement

⁵ Cities in Turkey where applicants of international protection are permitted to stay.

expectations has led to the situation that Non Syrian refugees are living in an isolated manner far from host communities. The language barriers, restricted economic independence, limited cultural knowledge contribute further to their isolation. Thus, participation in social life, education and labour market is essential for Non Syrian refugees.

2.3. Lessons learnt

Any project addressing non Syrian refugee needs to be formulated by a bottom-up and participatory approach, to ensure targeted activities and an effective program.

An intervention strategy that benefits both refugees and host communities is key to enhance social integration. It is essential to include within this strategy also communities of refugees enjoying a different status, alongside Syrian under Temporary Protection, who remain the main target of the Madad funds. Therefore, there is a need to invest in existing national and local systems to ensure that they cater for both the host communities and the Syrian and non-Syrian refugees, also to prevent social tensions among those three groups.

Strengthening the capacity of the local authorities is key to achieve long-term social cohesion focusing on those regions with the highest number of refugees. Therefore, there the Action aims at local authorities' capacities to respond to the needs of vulnerable individuals. This in turn will increase the access of refugees and asylum seekers to their rights and services.

Municipalities can play a crucial role in strengthening protection mechanisms in Turkey. However, due to gaps in the legal framework, municipalities are providing services to Non Syrian refugee on a voluntary basis without additional budgetary support. Therefore, cooperation with municipalities will include the increase their capacity in working with refugee and to advocate with relevant governmental agencies for additional resources for those municipalities.

There is a need to reach out to non-Syrian and particularly Iraqi refugee to provide accurate information on rights and services and/or recent developments. This is particular valid to follow up cases of vulnerable refugee and asylum seekers that cannot afford transport. The geographical coverage includes Outreach Teams to those areas where Iraqis constitute the majority of the non-Syrian refugee population and where there is no support mechanism.

2.4. Complementary actions

Under the EU **Instrument contributing to Stability and Peace (IcSP)**, since November 2016 the Turkish NGO ASAM is implementing a EUR 7.5 Million grant aimed at enhancing the protection of non-Syrian refugee and asylum seekers in Turkey and promoting their integration into Turkish society. ASAM will provide Services in 18 satellite cities across Turkey through multi-service centres and field offices. Although ASAM will not provide health services to beneficiaries it will facilitate asylum seekers' access to primary health care services through a system of referral to health providers and provide interpretation services.

Until the end of December 2016, **ECHO** has been funding various e-voucher modalities, cards restricted to certain products or certain supermarkets, (BIM cards, PTT, KizilayKart, Nargis, etc.). Since then, the ECHO funded **Emergency Social Safety Net (ESSN)** under the **Facility** took over, in collaboration with the Ministry of Family and Social Policies and implemented by the World Food Programme WFP and the Turkish Red Crescent Kizilay.

The ESSN platform is accessible to Syrians and non-Syrians alike, as long as they are registered with DGMM, have their address is registered with the civil registry (Mernis), are living in the province of registration, and meet vulnerability criteria. Beneficiaries receive regular (contrary to in-kind or one-off) unrestricted cash assistance.

Under **IPA** 2014, since August 2016, UNHCR has been implementing a EUR 40 Million Action lasting for overall 36 months, which includes capacity building for DGMM, however not specifically focused on Non-Syrians.

For the first time at the end of 2016 and the beginning of 2017, non-Syrians benefited from winterization assistance (one-time cash assistance) provided by UNHCR.

2.5. Donor co-ordination

The Government of Turkey's response to the Syrian crisis is led and coordinated by the Disaster and Emergency Management Authority (AFAD), while other line ministries and central/local government agencies are increasingly involved in the response. Local municipalities play a critical role in the implementation of the response. As a result of the protracted nature of the crisis, there is an increasingly strong call for a multi-sector resilience based response.

The EU Delegation in Ankara is co-chairing with ECHO regular meetings of the EU Refugee and Migration Coordination contact group with EU Member States with a view to share views and exchange information.

The Madad Management is in the lead to ensure coordination with EU Member States contributing to the Fund. Moreover, the Fund Management will also coordinate with its selected implementing partners or other stakeholders on regional level or cross border issues.

At a broader level the EU is actively contributing to overall donor co-ordination under the auspices of the United Nations in the framework of the Regional Refugee and Response Plan (3RP) that integrates humanitarian, development and macro fiscal interventions to increase coherence between humanitarian and development and national and regional priorities.

Coordination among stakeholders such as public authorities, NGOs, INGOs, donors, UN Agencies and other related actors has been also provided through coordination meetings and thematic working groups at the regional and central level. These coordination meetings could be organised by UN Inter Agency Coordination Unit, by UN Agencies and by the Governorates. These meetings enable stakeholders to share their projects, experiences, situation in the field, gaps and challenges.

Regular coordination meetings will be held between the EU Delegation in Ankara, ECHO and the Implementing Partner to ensure an overall strategy for the provisions of activities under this Action and to avoid any overlap with ECHO's above activities under the ESSN.

3. DETAILED DESCRIPTION

3.1. Objectives

The **Overall Objective** is to support refugees affected by the Syrian and Iraqi crises.

The **Specific Objectives** are to

- enhance the protection mechanism and promote integration for refugee and asylum seekers affected by the Syrian and Iraqi crises in Turkey, with a particular focus on Iraqi refugee;
- Strengthen the capacity of local authorities to deal with Refugees in Turkey.

3.2. Expected results and main activities

Turkey currently hosts more than 2.9 million registered Syrian refugees as the biggest group of refugee but not the only one. The proposed Action targets Non-Syrian refugees in Turkey

which are not covered by the temporary protection law as Syrian refugees are. The proposed implementation methodology ensures consistency with support already provided to the target group and builds on lessons learnt from these initiatives. The Action focuses mainly on Non-Syrian refugees in Turkey, a group that has not received enough attention over the past years mainly due to the focus on support to Syrian nationals.

In order to reduce the pressure on the existing health infrastructure due to influx of refugees, support to the health sector features as a critical need in Turkey. The particular aim of the Action is to provide support to non-Syrian refugees directly while leveraging with support to the host communities.

According to the 1951 Convention, the principle of non-discrimination on the basis of race, religion or country of origin shall apply to all refugees including in their access to gainful employment, welfare such as education and housing and administrative measures. This principle should be reflected in the implementation of EU Cooperation Aid in partner countries, and therefore refugees from all nationalities should be given importance.

The Action will provide assistance to refugee and asylum seekers through outreach activities, livelihood and educational activities, community outreach volunteers, refugee committees and mobile counselling teams. The above activities are in line with the rights listed under article 89 of the Law stating the access to assistance and services applicants of international protection may benefit from and; the harmonization process listed in article 96. Additionally, the Action will increase the capacity of DGMM and municipalities' staff to increase their capacity of working with refugees.

The Action is composed of two interlinked components, which collectively contribute to the overall objective of strengthening the resilience of both impacted groups (Non-Syrian refugees and host communities) and relevant institutions at local level. Component 1 focuses on enhancing the protection mechanisms in place and the promotion of integration. Component 2 focuses on capacity strengthening of local authorities. The components are designed to reinforce and complement each other. As such, this is a comprehensive and integrated response to the multiple challenges faced by the impacted communities and institutions.

Component 1: Enhancing protection mechanism and promotion of integration

Expected results and key indicators:

- Counselling services, various activities and specialised services provided to non-Syrian refugees in Sustainable Living Centres (SLC)⁶, Field Offices⁷, Mobile Counselling Teams and Counselling Line
 - 3.000 calls per month placed by Counselling Line
 - At least 150 counselling services per day provided to Non-Syrian refugees by Counselling Line

⁶ SLCs are similar to Multi-Service Centre ASAM has been running since 2013. They will operate with one-stop-shop approach providing various services to refugees and asylum seekers as Multi-Service Centres. However, SLCs will focus on inclusion of persons with specific needs (disabilities, single women and single parent, etc.).

⁷ ASAM Field offices provide social and legal counselling and basic health counselling and make referrals to the public service provider. Field Offices focus on information dissemination about rights and services that refugees and asylum seekers can benefit from through individual counselling and case management. Field offices also organize social and peacebuilding activities but the number of these activities are limited.

- At least 3.000 counselling services per month provided to Non-Syrian refugees by Counselling Line
 - 1.920 beneficiaries per month benefitted from counselling and referral by Counselling Line
 - 150 individuals per month identified by Counselling Line as vulnerable
 - At least 35% of Iraqi population and at least 5% of other refugee population living in target cities provided with counselling in SLC/Field Office
 - 300 beneficiaries participated at various activities organized by SLCs
 - At least 70% of persons with disabilities in Iraqi population and 30% of the other refugee population in project cities provided with specialised services in SLCs
 - 750 persons with disabilities benefitted during the project duration from basic rehabilitation services and medical referrals⁸ in SLCs
 - At least 40 house visits per month by Mobile Counselling Team (overall 200 visits)
 - 12.000 beneficiaries during the project duration benefitted from counselling services through Mobile Counselling Teams
- Outreach activities implemented
 - 6.000 beneficiaries during the project duration provided with counselling services during Outreach activities
 - At least 100 house visits per month conducted by Outreach teams
 - 240 beneficiaries identified as vulnerable by Outreach teams
 - Referral system in place
 - 75 external and internal referrals per month made by ASAM and other institutions to Mobile Counselling Teams
 - 50 referrals made per month by Counselling Line to Mobile Counselling Teams
 - 2.640 beneficiaries referred during the project duration by ASAM to public service providers (Provincial Directorates of Migration Management PDMM, MoFSP, Ministry of Health, Social Assistance and Solidarity Foundation SASF)
 - 250 referrals made per month by Counselling Line to public service providers (PDMM, MoFSP, MoH, SASF)
 - 880 beneficiaries during the project duration benefitted from social services and assistance after referral
 - Cash assistance provided
 - 250 beneficiaries during the project duration benefitted from cash assistance
 - Dialogue with local authorities
 - At least 2 visits conducted to local authorities in each mission per one Mobile Counselling Team (at least 300 visits during the project duration)

⁸ SLCs will have a physiotherapist that will give basic counselling and provide guidance to the persons with disability and to their families. Basic rehabilitation services don't cover full treatment or complex rehabilitation procedures but training on how to organise the house according to the need of person with disability, coping mechanism for the family, etc. Physical rehabilitation will be provided by organizations with the necessary institutional expertise.

Main activities:

- Establish Sustainable Living Centres for Non-Syrians in Karabük, Ordu, Sakarya and Yalova providing the following services:
 - Social Counselling and legal information on the international protection regulatory framework and associated rights and responsibilities, pathways and processes to durable solutions, etc.. Follow up individuals with specific needs⁹;
 - Health Counselling, Mental Health and Psychosocial Support (MHPSS) Services, Basic rehabilitation services for persons with disabilities⁷;
 - Cash assistance (local travel allowance, temporary accommodation allowance, assistance for medical report or equipment¹⁰, etc.)¹¹;
 - Outreach activities (to identify and reach most vulnerable and persons with specific needs, disseminate information on rights and services, to follow up on those who have been identified by Field offices or SLCs before through regular house visits)⁷;
 - Turkish, Arabic and English language courses for children and adults;
 - University preparation courses;
 - Computer courses, Vocational training courses¹², Cultural orientation programmes;
 - Human rights training (Gender Equality, Women’s Rights, children's' rights, etc.);
 - Social and peacebuilding activities (indoor and outdoor);
 - Specialised services (Braille literacy courses, referral provided by disability specialist, special education referrals).
- Establish new Field offices (Düzce and Kırıkkale) and build capacity in existing ones which
 - provide social and legal counselling and psychological support to refugees⁷;
 - make referrals to local mechanisms through social workers, health educators and psychologists, along with interpreters in case of need⁷;
 - offer an individual action plan depending on vulnerability and needs of client;
 - provide primary health care counselling¹³;
 - organize social and peacebuilding activities, life skills building training and language courses;
 - identify persons with specific needs (SGBV cases, LGBTI groups, persons with physical and mental disabilities, victims of torture, unaccompanied or separated children, serious or chronic medical problems) and provide them with support through the office and existing state mechanisms at local level⁷;

⁹ These are protection or (specialised) health services covered in running ECHO funded programmes. Therefore, when defining in the Description of Action a detailed list of activities, close cooperation and consultation with ECHO will have to be sought to avoid any overlaps and to identify complementarities.

¹⁰ Provision of medical equipment should be limited to specialized medical organizations.

¹¹ The project will cover expenses that no public authorities or mechanisms are covering, see also 2.4, complementarity to ECHO funded programmes under the ESSN. All assistance provided by Health educator/nurses working in ASAM offices will follow the doctors’ advice and prescriptions received at the hospital and will assist refugees/asylum seekers through clear procedures for obtaining the necessary equipment or medical report.

¹² After consultation with the Ministry of National Education Vocational trainings will be organised in cooperation with the Public Education Centre designed to respond to the needs of the labour market. ASAM will provide counselling regarding work permit and registration with ISKUR.

¹³ When defining a detailed list of activities for the Description of Action, this activity will be agreed with the Ministry of Health

→ offer various activities (empowerment of Iraqi women and youth through refugee outreach volunteers and refugee committees, specialised services for LGBTIs, Single Parents and Women and persons with disabilities).

Outreach teams will be added to those field offices where the majority of the non-Syrian population is constituted by Iraqis (Bolu, Eskişehir, Çankırı, Çorum, Mardin, Samsun and Yozgat).

– Mobile Counselling Teams

→ 5 Mobile Counselling Teams composed of two social workers (one male one female), one health educator or psychologist and two interpreters will be going to those provinces and regions where ASAM has no presence. Mobile Counselling Teams will organize missions according to referrals shared by the Counselling Line and other institutions according to the density of the refugee population in this city.

– Counselling Line

→ The purpose of the counselling line is to increase the accessibility of refugees and asylum seekers in Turkey to accurate information regarding their rights and respective services, and to identify individuals with specific needs who are not able to reach local authorities or other support mechanism in their city of residence. UNHCR-ASAM's Counselling Line is already operating with 13 consultants. By adding five more consultants, the Counselling Line can support dedicated activities for Iraqis and refer cases to the Mobile counselling teams.

Component 2: Capacity strengthening of local authorities

Main expected results and key indicators:

– Reception conditions in Turkey improved

→ 300 DGMM staff participated at 8 trainings provided by ASAM,

→ 2.640 beneficiaries referred to the public service providers

→ 880 beneficiaries benefitted from social services and assistances provided by public authorities,

– Referral pathways among governmental institutions work effectively

→ 2 meetings per month per project city with authorities such as Deputy Governor responsible for Migration PDMM, Social Services Centres and Provincial Directorate of MoFSP, AFAD and SASF,

→ 100 municipalities' representatives participated throughout the project at regional meetings organised by ASAM on how to work with refugees, legislation on rights and services that refugees can benefit in Turkey, referral pathways regarding protection mechanism, inclusion of refugee oriented services within Municipalities, projects that can be implemented by Municipalities and potential funding opportunities.

– DGMM Staff and municipalities capacity for working with refugees and asylum seekers increased

→ At least 8 trainings organized for 300 DGMM Staff (migration experts, removal centre staff)

→ At least 70% satisfaction rate of participants from trainings and meetings.

Main activities:

- Implement training programmes (topics: principles of working with vulnerable refugees and asylum seekers, interview techniques, cultural orientation, implementation of law and regulations including articles regarding protection of the target groups, referral pathways between governmental institutions and prevention of secondary trauma. The training will be provided to DGMM, PDMM and Removal Centre staff).
- Strengthen capacity of Municipalities (ASAM will strengthen its cooperation with municipalities to increase their capacity of working with refugees and also develop and implement their own projects through regional meetings with municipalities).

3.3. Risks and assumptions

The main assumptions are:

- AFAD, DGMM, municipalities and key stakeholders continue their support to the proposed activities;
- The number of Iraqi refugees remains stable;
- Access to labour market will gain more and more importance.

Risks	Planned Risk Response
Growing political instability and change of Government counterparts.	ASAM will closely follow the political developments in Turkey. Thanks to its daily contacts at all levels with Turkish authorities, ASAM is always well informed about potential changes.
Growing tension between refugees and host communities, especially over public resources and jobs.	An intervention strategy that benefits both Non-Syrian refugees (80%) and host communities (20%)
Insufficient capacity of implementing partners to meet project commitments.	Capacity building of municipalities and local NGOs.
Limited access to the labour market aggravates the living conditions of refugees and asylum seekers	Livelihood activities, vocational trainings and referral to financial assistance for vulnerable refugees will be provided.
Resettlement quotas allocated to Turkey will decrease (US).	Since the expectations are high regarding the resettlement, all the activities conducted by ASAM will focus on integration and self-reliance and economic self-sufficiency of the refugees and asylum seekers.
Tension between host community and refugee community increases.	Peacebuilding activities to promote peaceful coexistence will be organised and the host community will be encourage to benefit from the project activities.
Limited capacity of implementing partners to meet project commitments. (<i>repetition</i>)	Monitoring and Evaluation of the project will be done regularly and closely by ASAM HQ and necessary precautions will be taken or interventions will be done at the local and central level in order to meet the project commitments.
Funds allocated to the refugees and asylum seekers will decrease	It is likely that there will be a decrease in funding allocated to Turkey (mostly from US) and this will affect almost all the resources (UN Agencies, PRM) and this project's proposed activities and financial assistance to refugees and asylum seekers will play an important role in meeting the need on the ground.

3.4. Cross-cutting issues

Gender: Challenges for women to integrate into the Turkish society may be even higher, noting possible obstacles to work outside the house, language barriers, additional household responsibilities and limitations to the use of public transportation. At the same time, more than 55,89% of the Non-Syrian refugees are women and children, and more than 23,74% are youth.

Activities provided in the framework of this Action will focus on the empowerment of refugees and asylum seekers, especially of women and children. All activities will increase the resilience of the refugees and asylum seekers so that they are not dependent on assistance. In addition to gender specific interventions, the Action will use a gender sensitive approach to all project activities, including not only gender mainstreaming but also active promotion of gender equality.

The action will also try to align with the thematic objectives selected for Turkey for the implementation of the Gender Action Plan 2016-2020, to be pursued in all the EU actions in the country from now until 2020. Those include fight against all forms of VAWG, as well as equal access for girls and women to quality education and VET free from discrimination, and support to women's organisations and CSOs/HRD working for gender equality and women's and girls' empowerment.

Disabilities: social inclusion of persons with disabilities will be another focus of the Action since ASAM has already started a project in İzmir in partnership with the Refugee Support Centre (Association) to provide specialised services (basic rehabilitation services, coping mechanism for families, etc.).

Conflict sensitivity: The Action applies a conflict sensitive approach by following the 'Do No Harm Principle', in addition to activities that are aimed to enhance social cohesion and social integration. For instance, where possible, activities deliberately target both Non-Syrian refugees and host community members to support social cohesion and integration. Support will be provided for transparent and inclusive selection of project priorities through local structures.

3.5. Stakeholders

AFAD is the main coordinating body responsible to coordinate all refugee related activities in Turkey, and to avoid overlaps between different actions.

The stakeholders of this Action will include all relevant institutions at central and field level such as DGMM, PDMM, Ministry of Family and Social Policies, Ministry of National Education, Public Education Centres, Social Assistance and Solidarity Foundation SASF, Municipalities and local NGOs.

The content of the present Action has been consulted with AFAD and other relevant Government institutions.

4. IMPLEMENTATION ISSUES

4.1. Financing agreement, if relevant

In order to implement this Action, it is not foreseen to conclude a financing agreement with Turkey, referred to in Article 184(2)(b) of Regulation (EU, Euratom) No 966/2012.

4.2. Indicative operational implementation period

The indicative operational implementation period of the Action, during which the activities described in section 3.2 is 24 months from adoption of this Action Document by the Operational Board. In any case the latest date for implementation is 14 December 2019¹⁴, linked to the end of the legal duration of Madad.

4.3. Implementation components and modules

According to the Madad procedure, this Action is based on Concept Notes submitted by various potential Implementing Partners and the result of a competitive evaluation process. It has been consulted with the Turkish Government and the EU understands that it has been well received.

The Madad fund is an appropriate Instrument for this Action as it allows for a more flexible approach in the phase of project preparation in order to cover gaps in identified needs.

Grants: Direct award (Direct Management)

In order to be able to respond to immediate needs for interventions in the context of the Syrian crisis in favour of livelihood opportunities for Syrian refugee and their host communities the direct award of grants is foreseen.

The Fund has been established under Article 187 of the Financial Regulation as 'emergency' trust fund, and is therefore covered with flexible procedures applicable to crisis situations. Moreover, the crisis situation applicable to all programmes implemented in the whole of Syria and activities related to the Syrian crisis which will have to take place outside Syria is currently being updated.

Direct Management is foreseen for activities under this Action. A potential partner is the Association for Solidarity with Asylum-Seekers and Migrants (ASAM). ASAM was founded in 1995 after the Iraqi war and since then has been providing psycho-social support for asylum seekers and refugees coming from conflict zones. As outlined above, ASAM is in an exceptional position as it is the only NGO in Turkey mandated to carry out the registration of non-Syrian refugees. Furthermore, ASAM has the full support of the Turkish Government for its activities carried out in its Field Offices.

The proposed Action will continue current activities undertaken by ASAM with the funding of IcSP (providing services in 18 satellite cities across Turkey through multi-service centres and field offices). So far, ASAM has shown very good capacity to implement this contract and there is a high degree of confidence in working with them. Following the above, ASAM is uniquely placed to implement the proposed Action.

A negotiation team will be appointed by the Madad Trust Fund Manager.

a) Eligibility conditions

The lead applicant needs to be a legal entity, be non-profit making and non-governmental organisation. Specialised European or International non-profit operators and CSOs will be the envisaged partners.

b) Essential selection and award criteria

¹⁴ The implementation period of the contract must remain within the duration of the Trust Fund (currently 15 December 2019).

Essential selection criteria are the financial and operational capacity of the applicant. The essential award criteria are relevance of the proposed action to the objectives of the Action Document; design, effectiveness, feasibility, sustainability and cost-effectiveness of the Action.

Presence and experience in the region, immediate intervention capacity, and the ability to work in multi-actor approaches and inclusive partnerships aimed at recognising the value of different stakeholders' contributions and synergies will be part of the evaluation criteria.

c) Maximum rate of co-financing

The maximum possible rate of co-financing for the grants is 80% of the total eligible costs of the Action.

If full financing is essential for the Action to be carried out, the maximum possible rate of co-financing may be increased up to 100%. If full funding is essential, the applicant has to provide adequate justification to be accepted by Manager, in respect of the principles of equal treatment and sound financial management.

4.4. Indicative budget

Module	Amount in EUR*
Direct management with ASAM	10.000.000
Total	10.000.000

* *The costs of Evaluation and audit and Communication and visibility will be included in the projects' budgets and/or contracted separately via service contract(s).*

4.5. Performance Monitoring

Monitoring shall be ensured primarily through EU Delegations in-country and in particular with the assistance of specific Trust Fund field & liaison officers posted within the EU Delegations. In addition, the Madad Fund is planning to launch an independent M&E exercise to accompany all Fund programmes and ensure that targets are met and lessons learnt can be incorporated into other Madad actions.

The purpose of the Madad Fund Monitoring and Evaluation Framework would be to assess, across various levels, the degree to which the Overall Objective of the Trust Fund has been achieved.

Partners implementing this Action will comply with the ad hoc Monitoring and Evaluation Framework developed for the Madad Fund as well as with the reporting requirements and tools being developed by the EU Trust Fund.

The monitoring and evaluation exercises mentioned above will represent milestones in the implementation of the activities. These regular assessments will constitute a basis for a possible decision of suspension or revision of activities, should the conditions on the ground not allow for their proper implementation.

With regard to the Facility and Madad, the implementing partners will comply with the monitoring and evaluation requirements of the Facility. They will report quarterly on agreed Facility Results Framework indicators. This reporting requirement comes in addition to the obligations that partners have as part of their reporting against log frames. Each partner will only be required to be reporting on those indicators that directly correspond to their projects.

4.6. Evaluation and audit

Projects shall carry out an obligatory final evaluation, and one external audit per year. Whenever possible, evaluations will be jointly carried out by partners. This will also contribute to harmonise further and higher education support to Syrian refugees and to the host countries in the region, in order to make technical co-operation more effective in line with current EU guidelines¹⁵.

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts.

4.7. Communication and visibility

While communication and visibility of the EU is a legal obligation for all external actions funded by the EU, to date the visibility of the EU's support to the Syrian crisis, in particular in neighbouring countries affected by the crisis, has been insufficient. The public perception is that the EU is not addressing the Syrian crisis, when in fact it is the largest donor. The lack of visibility to the EU's actions weakens the EU's political traction in the region and its standing in Europe.

Therefore, communication and visibility is an important part of all Madad Fund programmes factored into the implementation in order to underline its importance at all stages of the planning and implementation of the Programme.

All visibility actions by Madad Fund implementing partners outside areas of conflict should be stepped up. Each implementer will have to draw up a comprehensive visibility and communication plan for their respective target country/community and submit a copy for approval to the Madad Fund and relevant EU Delegation. The related costs will be covered by the budgets of the contract as part of the project.

The measures shall be implemented by the implementing consortium/ia, its contractors, and/or its grant beneficiaries. Appropriate contractual obligations shall be included in, respectively, procurement and grant contracts.

The Communication and Visibility Manual for European Union External Action together with specific requirements to highlight the Madad Fund shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

All visibility and communications actions need to be discussed with the Madad Fund in order to ensure coherence and uniformity in messaging and branding. The Madad Fund's visual identity needs to be incorporated in all activities carried out by the implementing partners.

All communication and visibility-related activities included under this particular project would need to take place with due regard to the Facility Communication Strategy.

¹⁵ EC Guidelines No. 3, Making Technical Co-operation More Effective, March 2009.