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Executive Summary

1. The mid-term evaluation of the Emergency Social Safety Net (ESSN) in Turkey, funded by the Directorate General for European Civil Protection and Humanitarian Aid Operations (DG ECHO) was commissioned by the World Food Programme (WFP) Turkey Country Office. It covers the period from November 2016 to December 2017. This evaluation serves the dual objectives of accountability and learning. The evaluation will inform Year Two design and delivery, and document learnings from this innovative approach for the wider humanitarian community.
2. The intended users of the evaluation include WFP, the Turkish Red Crescent (TRC) (the main cooperating partner), various Ministries in the Republic of Turkey, DG ECHO and other donors, and other international humanitarian agencies.
3. Turkey currently hosts more refugees than any other country in the world. There are 3.7 million registered refugees in Turkey, of whom 3.5 million are Syrian refugees. The assistance provided to in-camp refugees by the Government is consistently noted to be exemplary. However, over 90 percent of refugees reside outside camps. Although the Government extends education and health services to refugees, needs assessments prior to the establishment of the ESSN confirmed high poverty levels and unmet basic needs amongst out-of-camp refugees.
4. The ESSN builds on earlier programmes which have been in place since 2012. The specific objective of the ESSN is to stabilize or improve living standards of the most vulnerable out-of-camp refugee households and covers both Syrian and other refugees living in Turkey. The programme has four stated results: (1) the provision of monthly basic needs assistance to vulnerable households through multi-purpose cash transfers; (2) the development of capacity of national partners; (3) the efficient and effective coordination of the humanitarian response; and (4) monitoring and learning.
5. The ESSN was designed in conjunction with the Government of Turkey and is implemented through a partnership between WFP, the TRC, the Ministry of Family and Social Policy (MoFSP) and Halkbank. The ESSN was scheduled to start payments in September 2016, and aimed to progressively scale-up to reach 1 million refugees by April 2017. ESSN funding commenced on 1 September 2016, with subsequent no-cost extensions granted to August 2018. The ESSN budget of €348 million was funded by the EU through the European Commission's Directorate General for European Civil Protection and Humanitarian Aid Operations (DG ECHO).

Methodology

6. The evaluation assessed the ESSN against the OECD DAC criteria. Key evaluation questions under the *relevance* criterion included the extent to which the ESSN meets the needs of refugees and if its objectives are coherent with national policies and donor strategies, and the appropriateness of the single platform approach. Under *effectiveness*, targeting and coverage performance of the ESSN were analysed, as were service delivery and achievement of programme outcomes. Questions under the *efficiency* criterion examined the main cost drivers of the ESSN and the proportion of total funding which reaches beneficiaries. Under *sustainability and connectedness* the alignment of the ESSN with the refugee response as a whole, and the Turkish system in particular, were analysed, and future prospects of the programme explored.
7. In order to respond to these questions, the evaluation team adopted a mixed method approach. Three quantitative datasets were analysed and qualitative fieldwork was conducted in five provinces, involving 23 focus group discussions (FGDs) and 51 province level key informant interviews (KIIs). In addition, 76 high-level KIIs were conducted in

Ankara and Brussels. Budget data and key programme documents were reviewed. Limitations included the fact that the team was unable to consult with members of the Turkish host community. Secondary literature, including survey reports, were used to address this gap.

Key Findings

8. **The ESSN provided relevant and appropriate assistance in a highly innovative format.** ESSN support was clearly relevant to meeting some of the basic needs of refugees living out of camps. Several needs assessments confirmed that refugees and asylum seekers living out-of-camps were unable to meet basic needs for food, shelter, fuel, utilities, hygiene and clothing. Therefore the ESSN met a need for financial assistance to complement other sector-based support and prevent extreme negative coping mechanisms. There was sufficient evidence to confirm both the needs and the appropriateness of using cash-based transfers to reduce the poverty and vulnerability of the refugees.

9. **The ESSN was relevant to the needs of refugees, but was not designed to accommodate the specific needs of particular vulnerable groups.** The level of assistance took into account both an income gap analysis and comparability with the benefits provided by the national system. The level of coverage was based primarily on resource availability. There was no beneficiary consultation during design and little information on the needs of particularly vulnerable groups. Consequently, ESSN assistance was initially relatively undifferentiated according to age, gender or ability.

10. **The ESSN was aligned with national policies and capitalised on national institutions, but remained a separate programme.** The overall response of the humanitarian community in Turkey has been aligned with, and supported, strong Turkish Government leadership. All stakeholders were fully involved in the ESSN design which was consistent with evolving national policies and priorities. The ESSN ‘piggybacks’ on the national system, as the national Social Assistance and Solidarity Foundations (SASF) are responsible for accepting and screening applications from refugees under temporary and international protection for ESSN assistance. However, the ESSN remains conceptually, administratively and financially distinct from the national social welfare system.

11. **The ESSN design was coherent with the EU’s strategy for aid in Turkey.** The ESSN was an integral component of the European Union response and embedded in the overall results framework of the Facility for Refugees in Turkey. As a humanitarian intervention, the ESSN has also been designed in accordance with the principles of humanity, neutrality, impartiality and independence. However, there was a degree of tension between an application-based approach and delivering needs-based assistance. The ESSN did not sufficiently anticipate the challenges that some households would face in application – including registration – or include activities to mitigate the consequences.

12. **The partnership arrangements established were generally appropriate to implement the ESSN, but links to protection services were limited.** While the partnership arrangements for implementation were complex, each agency was included to fulfil a necessary and clear role, based on their own comparative advantages. However, opportunities were missed in the design to include linkages between the SASFs and complementary protection services provided outside of the Government system by other United Nations agencies and the NGO sector¹.

13. **The results framework and logic of the ESSN design were generally well designed. However, key programme assumptions remained implicit and insufficiently mitigated.** The activities can be considered generally well designed and comprehensive as a basis for delivering the intended results, with the exception of the

¹ The original design of the ESSN included a proposal for protection referrals, see paragraph 105 for a discussion.

limited specification of capacity building activities. However, important assumptions were missing, which became clear during implementation. There is no evidence of assessments being undertaken of the capacity of implementing institutions and their operational systems for delivering social assistance. It is implicitly assumed that every refugee can obtain the documents required to apply. There is also an implicit assumption that the Turkish Government would take on future responsibility for the ESSN. However, this vision is not shared by government partners.

14. **The ESSN has significantly increased coverage of refugees, compared to preceding cash assistance, but targeting the most vulnerable has been challenging.** One third of refugees in Turkey were covered by the ESSN in February 2018, a fourfold increase in coverage. About half of all card holders are women. The main bottlenecks to application – including refugee registration – were identified and progressively addressed. The targeting approach facilitated transparency and a predictable caseload and was to some degree progressive, with 48 percent of the transfer going to the poorest 40 percent. However, the homogeneity of refugees and the scale of needs made targeting challenging, and many vulnerable households remained excluded.

15. **The process of selecting beneficiaries and delivering transfers was handled smoothly.** Uneven adherence to application procedure early in the programme was addressed. Applicants were informed of entitlements promptly, ATM cards were distributed efficiently and cash transfers delivered reliably. Beneficiary communication mechanisms took time to become established, but ultimately have been well-used and valued by beneficiaries. However, no appeals mechanism was established within the ESSN. Allegations of fraud and misuse of assistance were almost non-existent.

16. **The welfare of ESSN beneficiaries has improved.** On average, beneficiaries were better off after the transfer, more food secure, had lower debt levels and were less likely to resort to negative coping strategies. In comparison the welfare of non-beneficiaries has declined according to most of the analysed measures of welfare. The transfer was mostly spent on rent, food and improved access to education. The ESSN has may have indirectly led to increased housing and educational costs for some beneficiaries. The referral of protection cases by the ESSN to other service providers developed slowly and remained inconsistent. At the national level, the ESSN helped the government to better plan and manage the overall refugee response.

17. **Programme management and governance arrangements were largely effective.** Each of the implementing partners delivered on their responsibilities. Strong internal monitoring systems tracked the performance of the programme and supported constant review and adjustments during programme implementation. Effective coordination mechanisms were established at national and provincial levels.

18. The evidence suggests that the ESSN is significantly more cost-efficient than the preceding humanitarian assistance to refugees. The primary driver of cost efficiency is scale. However, given the exceptional scale of the programme, in absolute terms the administrative costs were high, at €9 million for direct support costs and €25 million for 7 percent Indirect Support Cost (ISC) charged by WFP. The programme did not meet the ambitious coverage targets set for scaling-up assistance and was delayed by unforeseen challenges in the application process, and by recruitment challenges amongst the implementing partners. The programme faced pressure to reach beneficiary targets quickly at the expense of capacity building and preparatory studies.

19. **The ESSN was generally appropriately connected with other refugee assistance.** The ESSN was well connected with other Turkish government responses, including discretionary assistance from SASFs resources and capitalised on TRC capacities. Other NGOs have refocused on providing complementary protection and livelihood support

activities. However, referrals out of the ESSN into protection programmes implemented by various humanitarian actors, were *ad hoc* and limited. Opportunities to create synergies with job creation, vocational and language training, and refugee livelihoods activities are limited due to the modest scale of these activities.

20. **Little progress has been made on determining the future of the ESSN.** The distinct nature of the ESSN, coupled with its scale, are obstacles to integration into the national system. No substantive progress was made in discussions on an exit strategy – one of the core activities under the ESSN logical framework.

Overall Assessment and Conclusions

21. The ESSN provided relevant and appropriate assistance in a highly innovative format. The ESSN was a highly innovative approach to the delivery of humanitarian aid, developed in close association with the Ministry of Family and Social Policy. At the same time, with the benefit of hindsight, some weaknesses can be identified in the design:

- i. The underlying analysis of refugee needs was limited.
- ii. The decision to provide application-based assistance left a significant number of vulnerable refugees outside of the footprint of the ESSN.
- iii. There is an unresolved tension over whether the primary objective of the ESSN is providing needs-based humanitarian assistance, or institutionalizing assistance to refugees within the national system.

22. Overall the ESSN systems worked well, especially considering the large numbers of refugees that were successfully reached. Each of the main actors contributed, based on comparative advantages, to deliver key services. Evidence shows that the ESSN transfers were effective in improving refugee welfare, providing access to shelter, food, utilities, education and other basic needs.

23. The ESSN targeting criteria provided a good solution to contextual pressures, but at the same time had limited success in identifying a smaller, slightly poorer proportion of what is a largely homogenous, group of poor refugees.

24. Gender did not significantly influence programming decisions and it was treated superficially in the ESSN proposal. While gender has recently been accorded greater prominence, the opportunity to influence key programme parameters at this point is limited.

25. Monitoring mechanisms performed strongly under WFP leadership in partnership with TRC, with relevant findings channelled to an inclusive and responsive Governing Board. However, there has been limited progress in enabling national organizations to progressively assume responsibility for accountability to donors.

26. There is credible evidence that the ESSN resulted in large cost savings compared to the previous humanitarian basic needs assistance. At the same time, there is clearly room for further significant reductions in administrative costs.

27. The sheer scale of the programme meant that basic needs assistance has been largely consolidated within the ESSN. While the ESSN was not a protection programme, it missed an opportunity to systematically identify and refer potential protection cases to a full range of service providers.

28. There has been no real progress at the level of a political dialogue on the future of the ESSN. The principal question is one of financing and how costs might be apportioned and shared. The process of integration is complicated by elements of the programme that do not align with Turkish Government social assistance policies.

Recommendations

29. Strategic and operational recommendations are presented in order of priority.

Strategic Recommendations

30. Recommendation 1: **WFP Turkey should encourage all partners to take a strategic decision on the primary objective of the ESSN.** To inform strategic and operational decisions, an urgent decision is needed on whether the ESSN is primarily intended to meet humanitarian needs or whether the objective is to support integration within national systems. There is a risk that the ESSN may come to an abrupt end, with negative consequences for beneficiaries.

31. Recommendation 2: **WFP Turkey should develop scenarios for the future of the ESSN under the two possible scenarios in Recommendation 1.** Working in tandem on the programmatic options can inform and help progress the political discussion and ensure timely adaptations in future phases.

32. Recommendation 3: **WFP Turkey should support other agencies to develop complementary livelihood and employment programmes.** It is recommended that the ESSN should maintain its focus on delivering unconditional cash transfers. However, drawing on the shared database of refugee profiles, WFP can contribute to the development of strategies by other actors with comparative advantages in livelihood and employment programmes.

33. Recommendation 4: **WFP Turkey and WFP Rome should improve cost efficiency and budget equity.** Consideration should be given at both the country office and the Executive Board levels on alternative cost models to allow WFP to remain competitive in large budget programmes such as the ESSN.

Operational Recommendations

34. Recommendation 5: **WFP Turkey should encourage all partners to minimize application barriers for specific vulnerable groups.** While progress has been made in addressing application barriers, further attention is required for the most vulnerable groups, including the disabled, women, the elderly and new arrivals.

35. Recommendation 6: **WFP Turkey should continue to engage with the Ministry of Family and Social Policy to strengthen referral mechanisms.** In the interests of establishing sustainable solutions, WFP should advocate with the Ministry of Family and Social Policy to include referral pathways for refugees from SASFs, to a broad range of providers, both inside and outside of government.

36. Recommendation 7: **WFP Turkey should develop and implement a technical assistance strategy in partnership with partners to handover accountability functions to Turkish institutions.** To facilitate the eventual full handover of responsibilities to Turkish institutions, WFP should develop a plan to build the capacities and skills of Turkish institutions to meet donor demands for accountability, including assessment, verification, monitoring, evaluation, and learning processes.

37. Recommendation 8: **WFP Turkey should ensure adequate needs and capacity assessments to support programme design.** In future phases of ESSN (and in other large-scale transfer projects) WFP should ensure that it: adequately consults potential beneficiaries; ensures that the necessary capacity assessments or self-assessments are conducted; and adequately analyses protection and gender concerns, including exclusion risks.

1 Introduction

38. A mid-term evaluation of the Directorate General for European Civil Protection and Humanitarian Aid Operations (DG ECHO)-funded Emergency Social Safety Net (ESSN) in Turkey was commissioned by the World Food Programme (WFP) Turkey Country Office, covering the period from November 2016 to December 2017.² The ESSN includes the largest ever European Union-supported humanitarian cash transfer programme and attaches itself to the Turkish social welfare system. The full terms of reference for the evaluation are found at Annex 1.

39. This mid-term evaluation is intended to serve the dual and mutually reinforcing objectives of accountability and learning:

- i. **Accountability:** the evaluation will assess and report on the performance and results of the ESSN programme.
- ii. **Learning:** the evaluation will determine the reasons why certain results occurred or not to draw lessons, derive good practices and pointers for learning. It will provide evidence-based findings to inform operational and strategic decision-making.

40. This is a mid-term operation evaluation to inform Year Two design and delivery. A final evaluation will take place in 2018 or 2019, which will assess accountability more thoroughly. However, this includes aspects of a pilot project evaluation as the results are intended for use within the humanitarian community at large, as the ESSN is the first programme of its kind. The scope of the ESSN, and its evaluation, is national. Key evaluation dates are listed in Annex 2.

41. The users of the evaluation findings and recommendations include WFP (Turkey Country Office, Regional Bureau in Cairo and Rome Headquarters [HQ]); the Turkish Red Crescent (TRC); the Republic of Turkey Ministry of Family and Social Policies, Disaster and Emergency Management Presidency (AFAD) and the Republic of Turkey Ministry of Interior; United Nations agencies; DG ECHO; and other donors, international non-governmental organizations (INGOs) and civil society organizations providing assistance to refugees³ in Turkey.

1.1 Overview of the Evaluation Subject

42. From 2012 onwards, WFP partnered with TRC to assist vulnerable Syrian refugees in camps through an e-voucher for food. Syrians living in 11 refugee camps continue to receive 50 Turkish Lira (TL) (approx. US\$18) per person per month for food, complemented by AFAD assistance.⁴ In 2015, the Kızılaykart was extended to Syrians living outside camps. Cash transfers to off-camp beneficiaries were phased out in April 2017 with the introduction of the ESSN.⁵ This preceding operation was not evaluated. For a detailed list of preceding activities please see Annex 6.

² Note that the first phase of the ESSN programme has been extended until August 2018.

³ Turkey has ratified the 1951 Convention Relating to the Status of Refugees, but not the 1967 Protocol of the Geneva Refugee Convention. Legally, only asylum seekers from Europe are named as refugees. Under Turkish law, asylum seekers from countries outside Europe may apply for International Protection (IP) status, Temporary Protection (TP) or a humanitarian residence permit. Syrians may apply for the specific status of “Syrian people under Temporary Protection”. Non-Syrians are mostly under TP. Since February 2015, some Iraqi asylum seekers in Turkey have obtained a “humanitarian residence permit” from DGMM, as per Article 46 of the LFIP. People under all three protection regimes can apply to the ESSN. For ease of reading, and in line with international terminology, the English version of this report refers to all three groups as *refugees* and distinguishes between “Syrian refugees” and “non-Syrian refugees” where appropriate. The Turkish version uses the term “asylum seekers”.

⁴ WFP (Jun 2017) *Country Brief* <http://documents.wfp.org/stellent/groups/public/documents/ep/wfp279438.pdf>.

⁵ WFP (Jun 2017) *Country Brief* <http://documents.wfp.org/stellent/groups/public/documents/ep/wfp279438.pdf>.

43. The ESSN is part of the regional Protracted Relief and Recovery Operation (PRRO) for the Syrian refugee crisis (PRRO 200987), which runs from 1 January 2017 to 31 December 2018.⁶ The PRRO aims to achieve sustainable solutions through support to the self-reliance of vulnerable refugee and host communities, while providing life-saving food assistance when needed. It is aligned with Sustainable Development Goals 2 and 17; activities will contribute to WFP’s Strategic Plan (2017–21) to end hunger (Strategic Objective 1) and improve nutrition (Strategic Objective 2), and resilience-based approaches to enhance self-reliance and livelihoods.

44. Under the PRRO, WFP applied for – and received – DG ECHO funding to address the needs of refugees in Turkey. The Humanitarian Implementation Plan (HIP) included a detailed description of the envisioned ESSN, which included provisions that “the ESSN will build upon the existing architecture and expertise of the Ministry of Family and Social Policy in partnership with the national implementation partner TRC.”

45. Key ESSN objectives, results, activities and indicators (as presented in the proposal to DG ECHO) have been reconstructed into an ESSN logical framework in Annex 3. WFP developed a specific Theory of Change (ToC) for the ESSN (see Annex 4). The specific objective of the ESSN is to stabilize or improve living standards of the most vulnerable out-of-camp refugee households. The programme has four stated results: (1) the provision of monthly basic needs assistance to vulnerable households through multi-purpose cash transfers; (2) the development of capacity of national partners; (3) the efficient and effective coordination of the humanitarian response; and (4) monitoring and learning.

46. Activities under result (1) include operational aspects of the cash transfer, such as defining targeting criteria and transfer values, sensitization, identification of beneficiaries and contracting of financial service and implementing partners. Activities under result (2) include capacity-building activities as well as the development of an exit strategy.⁷ Activities under result (3) include coordination activities, such as setting up the joint management cell (JMC), and activities under result (4) focus on the preparation of monitoring and evaluation (M&E) studies and assessments, such as the Comprehensive Vulnerability Monitoring Exercise (CVME) or the ESSN Baseline and Post-Distribution Monitoring (PDM). See Annex 3 for the ESSN results framework listing all results, indicators and activities in detail.

47. Protection-related outcomes and activities *per se* are not part of the ESSN logic, although there was an initial proposal that UNHCR should establish protection desks inside service centres. However, the ESSN may refer vulnerable refugees to government agencies and other agencies who provide protection services. The ESSN project committed to monitor gender disaggregated data, and include gender considerations in all consultations with beneficiaries, and all relevant activities.

48. The HIP outlines the original intended implementation schedule for the ESSN, with first payments scheduled in September 2016, reaching 500,000 refugees by December 2016 and achieving the programme objective of supporting 1 million refugees by April 2017.⁸ The transfer value was initially designed at TL180, but was negotiated with the Turkish authorities down at the start to TL100 (approximately US\$27), per person, per month.

49. The ESSN was designed in conjunction with the Government of Turkey and is implemented through a partnership between WFP, the TRC, the Ministry of Family and Social Policy and Halkbank. Annex 5 outlines the application process in full. Each partner’s role is outlined below:

⁶ Operationally, the PRRO ended in January 2018 and was superseded by a Transitional Interim Country Strategic Plan (TiCSP).

⁷ Single Form submitted by WFP to DG ECHO and restated in subsequent modification requests.

⁸ DG ECHO (2016) HIP for Turkey. Based on population data the estimated breakdown of the beneficiaries were 13 percent children <5 years, 36 percent children 5-17 years, 43 percent adults and 8 percent elderly >60years. 50.5 percent of beneficiaries were estimated to be female.

- Ministry of Family and Social Policy: receives applications to the ESSN through the Social Assistance and Solidarity Foundation (SASF) offices; leads the eligibility assessment and verification process, including the household visits.
- TRC: supports implementation and accountability, including the information dissemination and feedback mechanism (including the call centre, Facebook page, SMS centre); sensitization; verification and operational monitoring, supporting SASF to receive applications through service centres; contracting the financial service provider; referrals of protection cases, support logistics for card distribution.
- WFP: oversight and accountability; technical support; monitoring.
- Halkbank: provides financial services around the distribution and loading of ATM cards.

50. The ESSN budget of €348 million⁹ was 100 percent funded by DG ECHO, allocated under the 2016 DG ECHO HIP for Turkey, which in turn fell under the Facility for the Refugees in Turkey (FRiT), a European Union financing mechanism established to increase support for Syrian refugees in Turkey and their host communities.¹⁰ ESSN funding commenced on 1 September 2016, covering the next 12 months.

Programme Modifications

51. A first modification request was submitted by WFP to DG ECHO in February 2017. This requested transitional assistance during January and February 2017 to allow beneficiaries under the preceding WFP e-voucher programme for off-camp refugees time to apply to, and be assessed under, the ESSN. This modification request was approved.

52. A second modification request was submitted in April 2017.¹¹ The main elements of this request included a no-cost extension until December 2017; increasing the transfer value (equivalent to a monthly average of approximately TL 133);¹² relaxing eligibility criteria to include households with a lower dependency ratio and households with 1 instead of 2 disabled household members; increasing targeted beneficiaries to 1.3 million refugees by end of 2017; and piloting a discretionary allowance. The number of service centres was revised – from 23 to 18. The request was approved in June 2017.

53. A third modification request was submitted in October 2017. This requested a no-cost extension until August 2018, for two reasons: first, to process sweepbacks which, following Ministry of Family and Social Policy practice, recover funds from dormant accounts after six months of inactivity; and, second, to fund WFP and TRC activities planned for 2017 into 2018. An updated logical framework was also submitted. The request was also approved.

⁹ The second contract, covering 2019 and not subject to this evaluation, amounts to €650 million.

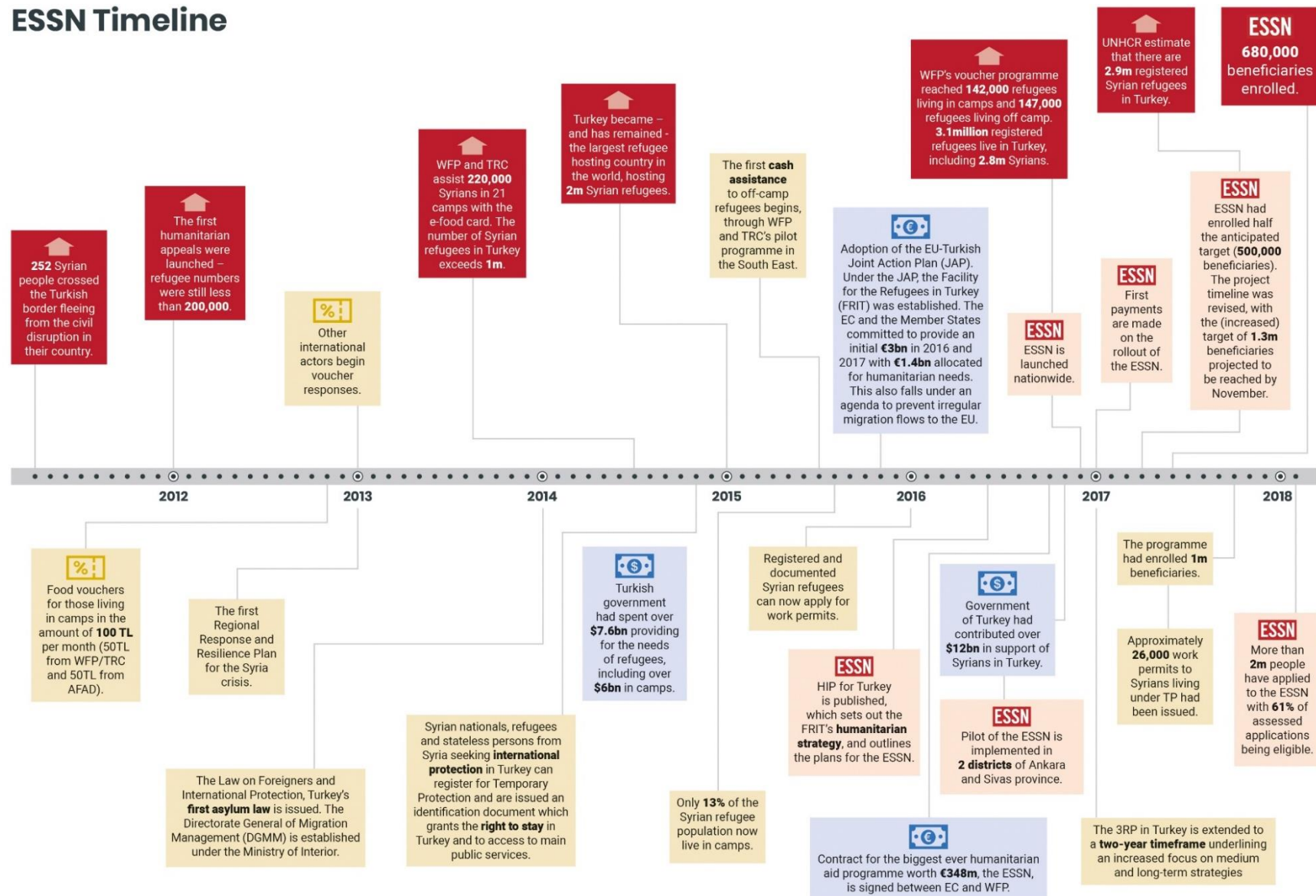
¹⁰ The European Commission and the Member States committed to provide an initial €3 billion to the FRiT in 2016 and 2017 – which supports both humanitarian and development programmes. A second tranche of FRiT, foreseen in the original Joint Action Plan (JAP), was announced in March 2018.

¹¹ WFP (29 Apr 2017) “Modification Request to DG ECHO”.

¹² This average payment is composed of the TL 120 transfer value in addition to a variable quarterly top-up transfer reflecting household size. The additional benefit is 250 TL for households with 1-4 people, 150 TL for households with 5-8 people and 50 TL for households with 9 or more people. The top-up value is per household and not per individual. .

Figure 1: ESSN timeline

ESSN Timeline



See Annex 6 for a detailed timeline. *Source:* OPM, using WFP Turkey (2017) WFP Timeline, April 2017; WFP (2017) Country Brief, Jun 2017, <http://documents.wfp.org/stellent/groups/public/documents/ep/wfp279438.pdf>; BCG (2017) DG ECHO Presentation, Mar 2017.

1.1 Context

54. Turkey currently hosts more refugees than any other country in the world. There are 3.7 million registered refugees in Turkey, of whom 3.5 million are Syrian refugees. Just under half of Syrian refugees (approximately 46 percent) are children; there are more male Syrian refugees (54 percent) than female Syrian refugees.¹³

55. Refugees are dispersed across all provinces. Metropolitan cities and south eastern provinces (Şanlıurfa, Gaziantep, Hatay, in the South East and Istanbul) host the highest concentrations of Syrian refugees; non-Syrian refugees are concentrated in central provinces. See Annex 7 visualizing the distribution of Syrian and non-Syrian refugees.

56. The assistance provided to in-camp refugees by the Government is consistently noted to be exemplary and exceeds international standards. However, over 90 percent of refugees¹⁴ reside outside camps. A summary of findings on their situation prior to the introduction of the ESSN was as follows:

- Food, nutrition and basic needs: Refugees were comparatively food secure, with 77 percent reporting acceptable food security scores in 2016¹⁵
- Income and poverty: Wages from unskilled labour were the primary sources of income (63 percent in 2016);¹⁶ 93 percent of Syrians refugees interviewed in South East Turkey¹⁷ lived below the national poverty line¹⁸.
- Education: Refugees who are registered in Turkey had access to Turkish schools, including one year of compulsory preschool. As of April 2017, temporary education centres are being phased out and replaced by official state school. However, enrolment rates were estimated at only 40 percent.¹⁹
- Health: Refugees who are registered in Turkey can benefit from the same level of emergency, preventive and curative health services as Turkish citizens, while non-registered refugees were provided emergency care.
- Gender: Widespread poverty amongst refugees has particularly adverse consequences for women and children, who are vulnerable to early marriage and child labour.²⁰ It is estimated that more than half of female refugees need psychological services as many have experienced intimate partner violence, sexual violence, or forced or early marriage.²¹

57. The Government of Turkey has demonstrated a strong commitment to supporting refugees. Under the Temporary Protection (TP) regime, Syrian refugees are issued with an identification document that grants the right to stay in Turkey and access to main public

¹³ Syrian refugees: DGMM (8 Mar 2018) Number of Syrians under temporary protection, per year (accessed 20 March 2018) http://www.goc.gov.tr/icerik6/temporary-protection_915_1024_4748_icerik

Non-Syrian refugees: IP (2017) http://www.goc.gov.tr/icerik6/international-protection_915_1024_4747_icerik
The distribution of age and gender of registered Syrians under temporary protection (8 March 2018) http://www.goc.gov.tr/icerik3/temporary-protection_915_1024_4748

¹⁴ On p. 29, the Third Regional Response Plan (3RP) cites “joint partner surveys” for this figure. 3RP does not include references, and we do not have access to these “joint partner surveys”; we thus use 3RP as a source.

¹⁵ and 86 percent in 2017. Food security scores above 42 are considered acceptable. Authors’ calculations from PAB and PDM data. 2016 data refers to the PAB and 2017 data to the PDM. Please note that we treat PAB and PDM as repeated cross-sections, not as panel data.

¹⁶ and 55 percent in 2017. Authors’ calculations from PAB and PDM data. 2016 data refers to the PAB and 2017 data to the PDM. Please note that we treat PAB and PDM as repeated cross-sections, not as panel data.

¹⁷ WFP Turkey – *Off-camp Syrian refugees in Turkey* (April 2016).

¹⁸ The national poverty lines used in the cited study are estimated based on the last available consumption-based Turkish national poverty lines dated 2010 (National Statistical Institute – NSI, 2010), adjusted with the inflation factors. The poverty lines vary by household size, and per capita poverty lines are higher with smaller household sizes. Taking an example of a household with five members, the food poverty line is estimated at 107 TL per capita, and the poverty line (“complete poverty line”) is at 302 TL, whereas with the household size of two, the food poverty line and the poverty line are 157 TL and 442 TL respectively.

¹⁹ UNICEF (2017) “Over 40 percent of Syrian refugee children in Turkey missing out on education, despite massive increase in enrolment rates – UNICEF” https://www.unicef.org/media/media_94417.html

²⁰ Centre for Transnational Development and Collaboration. (2015) *Syrian Refugees in Turkey: Gender Analysis*. London <http://ctdc.org/publication/syrian-refugees-in-turkey-gender-analysis/>

²¹ AFAD. Syrian Women in Turkey (2014) https://www.afad.gov.tr/upload/Node/3904/xfiles/afad-suriye-kdn_eng.pdf

services, including free access to state health care and education services and access to social assistance for vulnerable cases. In September 2015, Turkey estimated spending over US\$7.6 billion providing for the needs of refugees, including over US\$6 billion in camps.²² In 2017, AFAD reported that a further US\$6 billion was allocated to supporting Syrian refugees in 2016, and that the cumulative spending since the start of the crisis stood at US\$25 billion.²³

58. Support from the humanitarian community has aligned with and supported Turkish Government leadership. Support from the United Nations and NGO partners to the Government of Turkey is consolidated through the annual 3RP. The ESSN is an integral component of the 3RP. While the Government of Turkey leads overall coordination, WFP leads the food security sector and co-chairs the Cash-Based Interventions Technical Working Group (CBI–TWG) and the associated Vulnerability Sub-Working Group. A Basic Needs Working Group provides a platform to discuss the ESSN.

59. Over the last decade, there has been a global increase in the use of cash and voucher transfers to deliver humanitarian assistance. WFP has dramatically scaled up the use of cash-based transfers to deliver US\$80million to 14.3 million people by 2016.²⁴ Given its mandate, WFP largely delivers its assistance in the form of food vouchers, rather than as unrestricted cash. In contrast DG ECHO has been scaling up the use of cash transfers to cover the basic needs of the affected population without preconditions and focused on improving cost effectiveness by delivering cash transfers at scale.²⁵

1.2 Evaluation Methodology and Limitations

60. As envisaged in the terms of reference, the internationally agreed evaluation criteria of relevance, effectiveness, efficiency, sustainability and connectedness have been employed.²⁶ The evaluation matrix is presented in Annex 9. These criteria were judged as appropriate to the subject of the evaluation. In addition, aspects of coherence, coverage and impact are assessed under these criteria. Answers to each of the evaluation questions (EQs) are provided in the findings section of the report. Gender will be addressed as appropriate and as guided by the evaluation matrix.

61. Each EQ was addressed by a combination of research methods, which encompassed qualitative data collection, analysis of quantitative data and a literature review. The qualitative instruments used to answer the EQs included structured interviews in Brussels and Ankara, as well as at provincial level and in focus group discussions (FGDs).

62. A total of 76²⁷ Key Informant Interviews (KIIs) were conducted internationally and in Ankara, and 51 KIIs were conducted with province level stakeholders at provincial and district levels. Managers and expert-level staff from stakeholder institutions ((Social Solidarity Foundation Offices, DGMM, Population Directorate, TRC service centres, WFP local offices and Halkbank) were interviewed in each sampled province. The stakeholders consulted in Ankara and internationally are presented in Annex 10. Results from province level KIIs are presented in Annex 11.

63. FGDs were used to collect information from refugees – both beneficiaries and non-beneficiaries. FGDs were organized to collect disaggregated views from men and women – both Syrian refugees and refugees of other nationalities. To understand how the programme has functioned in different contexts, the evaluation team conducted fieldwork in five

²² World Bank (2015) *Turkey's Response to the Syrian Refugee Crisis and the Road Ahead* <http://www.worldbank.org/en/country/turkey/publication/turkeys-response-to-the-syrian-refugee-crisis-and-the-road-ahead>.

²³ AFAD (July 2017) *Suriyeli Sığınmacılara Yapılan Yardımlar* https://www.afad.gov.tr/upload/Node/2373/files/Suriyeli_Siginmacilara_Yapilan_Yardimlar+3.pdf

²⁴ WFP, Cash transfers <http://www1.wfp.org/cash-based-transfers> (accessed 13 August 2017).

²⁵ DG ECHO (2015) 10 Common principles for scaling up cash-based humanitarian assistance <http://www.cashlearning.org/downloads/conceptpapercommononlineprinciplesen.pdf>.

²⁶ <https://www.alnap.org/system/files/content/resource/files/main/eha-2006.pdf>

²⁷ Note that a number of respondents were interviewed twice, or even three times.

provinces, taking into account three selection criteria: (i) a high refugee caseload and high economic potential (Istanbul and İzmir); (ii) high refugee caseloads and varying levels of capacity²⁸ (Hatay and Şanlıurfa); and (iii) higher non-Syrian refugee incidence (Afyonkarahisar).

64. A total of 23 FGDs were conducted, 15 with beneficiaries and 8 with non-beneficiaries.²⁹ Of the refugees, 177 were consulted during FGDs, of whom 106 were women. All provincial data was coded and analysed using NVivo. Several tools were used in FGDs, including process mapping, expenditure mapping and mini life histories. This research methodology has undergone ethical review and been approved. A detailed description of the methods used in the FGDs and ethics approval is provided in Annex 12.

65. The evaluation did not collect primary quantitative data, but did carry out secondary analysis of existing datasets. A secondary data analysis was carried out on three datasets, namely the pre-assistance baseline (PAB) survey, the CVME and the PDM survey. There is little data on non-applicants to the ESSN. The CVME is the only dataset available on this group, but it is not representative and includes only a small sample of non-applicants. Annex 12 describes how key indicators and poverty measures were constructed and describes each dataset in more detail. Annex 13 presents the data analysis of the three datasets.

66. In addition to qualitative and quantitative data, financial data informed the efficiency analysis. The evaluation identified the in-kind contributions from SASF staff handling ESSN applications (see Annex 11 for a description of our methodology).

67. Gender has been a cross-cutting line of enquiry and gender issues have been integrated into EQs, mainly under the headings of relevance and effectiveness. The WFP 2015–2020 gender policy is used as a framework for assessing the performance of the ESSN. Gender analysis was mainstreamed and a shared responsibility amongst the team.

68. The bibliography at Annex 14 is drawn from a much larger e-library of documents gathered with the support of WFP (see Annex 15), which has provided the background information for this evaluation. The literature includes documentation on the ESSN, reference documents on the strategies and policies of various stakeholders and relevant evaluations.

69. The evaluation suffered from three key limitations. First, it was unable to speak to Turkish nationals to address the EQ related to the host community. (These have been addressed using secondary literature.) Second, all FGDs were convened with the support of TRC, which was invaluable and which we gratefully acknowledge. TRC staff did not attend a single FGD; they diligently followed sampling instructions and, to the best of our assessment, FGD participants spoke candidly. We nevertheless did not carry out beneficiary sampling ourselves.

70. Three separate quality control stages were in place:

- i. Quality assurance was provided by an international humanitarian evaluation expert.
- ii. This evaluation met quality standards set out in WFP's Decentralized Evaluation Quality Assurance System.³⁰
- iii. A final quality review will be provided by an evaluation reference group, chaired by the Deputy Country Director of WFP Turkey, and attended by colleagues from DG ECHO, the Ministry of Family and Social Policy, TRC, AFAD and the Ministry of Interior. A list of members is detailed in Annex 16.

²⁸ Proxied by Bankasi (2015) Province Development Index Ranking https://ekonomi.isbank.com.tr/UserFiles/pdf/ar_07_2015.pdf

²⁹ Due to the lack of attendees at two FGDs (one with ESSN beneficiary non-Syrian women and one with beneficiary Syrian men) in Istanbul, once the fieldwork was completed we repeated the two groups. This time, only one Iraqi lady attended the discussion, and this FGD turned into an in-depth interview. As a result of this failure, we decided to use the data coming from the pilot FGD with beneficiary Syrian women in Istanbul.

³⁰ WFP (Apr 2017) *DEQAS: Decentralized Evaluation Quality Assurance System*
<https://docs.wfp.org/api/documents/9f13fcec2d6f45f6915beade8e542024/download/>

2 Evaluation Findings

71. The evaluation findings and the evidence to substantiate them are presented below. They are structured as a response to each EQ in turn. The evaluation was able to gather sufficient evidence to answer all evaluation questions sufficiently.

2.1 Relevance

2.1.1 Is the ESSN Relevant to the Needs of Refugees in Turkey?

72. In cooperation with the Turkish authorities, the European Commission launched a First Stage Needs Assessment for Syrians under TP in Turkey, which was completed in April 2016. This found that living conditions of refugees and asylum seekers living out-of-camp were precarious. Economic insecurity was a key aspect of vulnerability across sectors, as refugees accessed many goods and services they needed through the market. Lack of income was the primary barrier to meeting basic needs for food, shelter, fuel, utilities, hygiene and clothing. It was also a barrier to children accessing education services, and contributed to protection risks due to the reliance of households on negative coping strategies.³¹

73. A 2015 survey conducted in South East Turkey confirmed the relevance of the programme, as 93 percent of refugees were found to be living below the Turkish poverty line and households struggled to meet a range of essential needs due to a chronic lack of income.³² These needs were reconfirmed in the evaluation FGDs, where refugees ranked their priority needs as follows: first, affordable, decent housing; and second, food of good quality and variety (see Annex 8 for results from FGDs).

74. Stakeholders consulted in the European Commission Needs Assessment agreed that provision of a social safety net accessible to refugees to cover these financial needs was a clear gap in humanitarian assistance.³³ Based on these findings, 3RP 2017/18 identified a short- to medium-term need for financial assistance to meet basic needs and avoid extreme negative coping mechanisms.³⁴

75. The ESSN was not designed to cover all cash needs and excluded the costs of education³⁵ and protection-related services. It was also not designed to address needs in sectors such as education and health, which require overcoming supply side constraints and socio-cultural and attitudinal barriers.³⁶ The ESSN was designed to complement the activities of other 3RP actors working in these sectors.³⁷

76. According to standard practice in the design of humanitarian cash-based interventions, the cash transfer amount was estimated based on a calculation of the minimum expenditure basket (MEB) for an average-sized household of six members and an expenditure gap analysis.³⁸ This analysis was undertaken in consultation with key stakeholders, including Turkish Government partners but also other humanitarian actors through the CBI–TWG. Based on these figures, the gap was calculated at TL 174 per person, per month. This analysis was based on the WFP PAB conducted among off-camp

³¹ Biehl (2016) *Needs Assessment Report for the Preparation of an Enhanced European Union Support to Turkey on the Refugee Crisis*.

³² Authors analysis of the PAB data shows that 80% of applicant refugees are below the MEB (see Table 22 in Annex 13).

³³ Biehl (2016) *Needs Assessment Report for the Preparation of an Enhanced European Union Support to Turkey on the Refugee Crisis*.

³⁴ *Regional Refugee and Resilience Plan (3RP) Turkey 2017–18* (2017) UNHCR.

³⁵ The costs of education for refugee children are addressed through a parallel Conditional Cash Transfer for Education (CCTE)

³⁶ For example, in the education sector, barriers to enrolment and attendance include economic hardship (linked with child labour); distance from schools and transportation costs; limited knowledge of Turkish language; lack of catch-up and support programmes; and a lack of information about education rights and services. In health, the main challenges are the capacity of the national health services to absorb the increased demand and the lack of specialised services for the needs of vulnerable refugee groups, such as those with disabilities (*Regional Refugee & Resilience Plan [3RP] Turkey 2017–18 [2017]* UNHCR; Biehl [2016] *Needs Assessment Report for the Preparation of an Enhanced European Union Support to Turkey on the Refugee Crisis*).

³⁷ Biehl (2016) recommends that the ESSN be complemented by the provision of services in areas such as protection, specific health interventions (such as disabilities) and activities related to education.

³⁸ CBI TWG (Sep 2016) MEB/SMEB Calculation for Syrians Living in Turkey.

beneficiaries in South Eastern Turkey, which was geographically limited, used a non-random sample and covered TPs (but not IPs).³⁹

77. The final level of the ESSN transfer took into account Turkish Government concerns on comparability with the benefits provided to poor Turkish citizens through the national social assistance system and wider stakeholder concerns on sustainability and social cohesion. Based on this, the agreed value was TL 100 (approximately US\$27), per person, per month. ⁴⁰ This remained a point of contention, and humanitarian actors argued that the needs of refugees were greater than those of poor Turks.⁴¹ The standard monthly transfer value was subsequently reviewed and increased (see para. 52).^{42, 43}

78. The ESSN target to reach 1 million beneficiaries was set by DG ECHO as the donor, rather than by WFP on the basis of needs assessments. While broadly based on reaching about 40 percent of the registered number of TPs and IPs in Turkey, there was no underlying methodology or transparent link between this target and the PAB carried out in South Eastern Turkey.

79. Humanitarian actors reported limitations in the availability of data on the humanitarian needs of refugees living out of camps, especially regarding socio-economic vulnerabilities. Between 2013 and 2016, there was no nationally representative survey of refugees.⁴⁴ For example, this meant that basic statistics on the number and types of disability were not available for planning purposes. Humanitarian actors reported challenges in gaining the approval for data gathering,⁴⁵ and the sharing of official datasets is limited due to strong legal safeguards on data privacy.

80. There is no evidence of direct beneficiary consultation on the ESSN design in the documentation or interviews. For example, beneficiaries were not consulted about their opinion on receiving assistance through the Turkish SAFs or preferences on transfer modalities. There were no assessments of the needs of or challenges facing the most vulnerable refugees, for example in accessing the necessary documentation to support ESSN applications. The ESSN proposal reports that consultations informing the design were disaggregated by gender. However, the results of these consultations are not presented.

Gender and Protection

81. The ESSN was not designed to accommodate the specific needs of, nor the constraints facing, particular vulnerable groups. The programme had a relatively standard design for all refugees (including both TP and IP refugees, male and female, different age groups and those with disabilities).⁴⁶ For example, the evaluation team did not find evidence of a structured discussion on the pros and cons of making women the default card holders – a safeguard that is a common practice for many global WFP programmes, and a practice used for CCTE benefits under the Turkish system.

82. The limited analysis of gender and protection issues was paralleled by limited specialized professional resources available at the start of the programme. A full-time WFP gender position was only appointed in February 2018. A Gender Activities Plan (GAP), a

³⁹ Stakeholder interview 31.

⁴⁰ Socialprotection.org (2018) International Conference on Social Protection in contexts of Fragility and Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons, Brussels <https://www.youtube.com/watch?v=US5l4NsShog>.

⁴¹ Stakeholder interviews 3, 5, 31, 35, 38, 39 and 55.

⁴² The quarterly top-ups were larger for smaller households: TL 250 (1–4 people households); TL 150 (5–8 households); and TL 50 (9+ households).

⁴³ The total assistance provided annually is still in line with the value of TL 130 per person per month provided to citizens under the Turkish social assistance system, which was stipulated by the Ministry of Family and Social Policy.

⁴⁴ Smith (2017) *Approaches to Providing Cash Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

⁴⁵ Stakeholder interviews 1, 31, 33, 35, 36, 37, 41 and 71.

⁴⁶ The ESSN does specifically target single women as beneficiaries with a protection (rather than poverty-related) objective. In addition, ESSN beneficiaries became eligible to apply for a disability carer's allowance in line with the benefits available to Turkish citizens, starting in 2018.

corporate requirement of WFP, while started has yet to be completed. The GAP would have been highly relevant to planning the ESSN.

83. The European Commission Needs Assessment identified protection risks faced by refugees, including language barriers, a lack of assistance in understanding Turkish Government regulations and how access to services (especially social welfare), psychosocial issues, and heightened child protection, sexual and gender-based violence risks.⁴⁷ There is some evidence that the ESSN design incorporates findings of the assessment and seeks to mitigate them. For example:

- The emphasis placed from the outset on sensitization of refugees and investment in communication channels and materials accessible to refugee populations (multi-lingual messaging; phone, social media and face-to-face channels).⁴⁸
- The design of a protection referral system to identify and support the specialized protection needs of refugees.

84. However, since implementation began, there have been concerted efforts by WFP and TRC to better understand beneficiary perspectives through programme monitoring and accountability mechanisms (see para. 140). For example, in 2017, the ESSN Taskforce commissioned a survey of the needs of those living with disability.⁴⁹ The findings have been discussed by the taskforce and have influenced ESSN modifications.

2.1.2 To What Extent are the ESSN Objectives Coherent with National Policies and Programmes?

85. Since the onset of the Syrian refugee crisis, the Turkish Government has played the lead role in hosting and supporting refugees and has for the most part implemented an open-door policy for Syrian refugees. The response strategy of the humanitarian community has aligned with and supported Turkish Government leadership. Support from United Nations and NGO partners to the Government of Turkey is consolidated through the annual 3RP. The ESSN is an integral component of 3RP.

86. The ESSN is specifically aligned with (and aims to support) recent policy reforms of the Turkish Government that aim to increase refugees’ access to services and have opened opportunities for more integration. Indeed, changes in the policy and regulatory environment of the Turkish Government were necessary precursors to the feasibility and legitimacy of the ESSN design.

- In 2013, Turkey’s Law on Foreigners and International Protection (IP) provided TP for Syrian nationals, refugees and stateless persons from Syria seeking IP in Turkey. Those that register for TP were granted the right to stay in Turkey and to access public services including health, education and social assistance. This allowed for the design of a safety net programme for refugees linked with the national social assistance system of the Turkish Government (see Table 1).

Table 1: Addressing Constraints to Use of Cash Transfers

Constraint to use of cash transfers	Changes made
Opening of accounts by non-Turkish nationals usually requires strict forms of ID ⁵⁰	TP regulation introduced the formal ID card for refugees to access public services

⁴⁷ UNCHR (2017) 3RP Turkey 2017–18; Biehl (2016) *Needs Assessment Report for the Preparation of an Enhanced European Union Support to Turkey on the Refugee Crisis*.

⁴⁸ CaLP (2018) *The State of the World’s Cash Report*.

⁴⁹ WFP Turkey (2017) *Report on Online Survey on Disability Health Report*.

⁵⁰ The legal justification for financial institutions to allow non-Turkish people to receive funds or open an account normally requires proof of identity in the form of a passport and residence in Turkey. Pre-paid cards do not require refugees to open bank accounts so this is not relevant in terms of the payments mechanism of the ESSN.

Regulations on provision of social assistance dictate that organizations providing financial assistance to refugees be registered as national ‘foundations’ or ‘associations’ in Turkey	As the national non-governmental partner, TRC was able to obtain permission for implementing a financial assistance programme
Non-Turkish INGOs require permission of the Ministry of Interior and the Ministry for Foreign Affairs if they deliver cash without a Turkish partner organization ⁵¹	To address this, TRC’s Kızılaykart began to be used by other agencies to deliver cash assistance as a top-up

- Whereas opening of accounts by non-Turkish nationals usually requires registration in Turkey, the TP regulation introduced a formal ID card for refugees that is recognised by banks. This enabled cash assistance to be provided to refugees in a safe and efficient manner.⁵²
- Under the TP regulation, as of January 2016, formally registered Syrian refugees can apply for work permits to access formal employment within their province of residence. According to WFP, however, as of September 2017 only approximately 26,000 had been issued – less than 4 percent of the population.⁵³ The ESSN complements this policy by filling a critical income gap for those refugee households who do not benefit from formal employment in Turkey.

87. All stakeholders confirmed that, at the managerial level, a highly participative process was used in developing the ESSN that fully involved the Turkish Government. Initially led by DG ECHO, a design process established working groups to agree key features of the design – including targeting and application processes – and a large number of meetings took place between January and May 2016. Turkish Government stakeholders across the involved ministries confirmed to the evaluators that they perceived the resulting ESSN design as consistent with evolving national policies and priorities. As one senior ministry official commented:

“We were present and active in every stage of the ESSN, in targeting criteria and also in the modification of criteria. Our recommendations were taken into consideration.”⁵⁴

88. The involvement of both TRC and the Ministry of Family and Social Policy as programme partners enabled the Turkish Government to influence the design of the ESSN.⁵⁵ However, the Turkish Government also displayed flexibility on key decisions, including channelling ESSN funds through the United Nations⁵⁶ and adapting application and payment processes.⁵⁷ The Turkish Government originally asked for a five-year commitment to the ESSN by the European Union, but agreed to a much shorter initial phase.⁵⁸

89. The ESSN was designed in line with the regulations and policies of the Turkish Government on personal data protection. WFP was reliant on a data-sharing agreement between the government and TRC established specifically for the ESSN and could not access data that personally identified beneficiaries. This posed challenges in ensuring accurate targeting and verification, as well as independent M&E.⁵⁹ As data-sharing rules could not be relaxed, WFP, MoFSP, DGMM and TRC worked within the legal requirements.⁶⁰

⁵¹ Diakonie Katastrophenhilfe (2015) *Overview: cash and voucher assistance to refugees in Turkey*.

⁵² CaLP (2018) *The State of the World’s Cash Report*.

⁵³ *Ibid.*

⁵⁴ Stakeholder interview 65.

⁵⁵ Stakeholder interview 11.

⁵⁶ There was a government expectation that money would go directly to Turkish institutions (stakeholder interviews 3, 11, 32 and 55).

⁵⁷ For example, conducting ex-post (rather than ex-ante) HOUSEHOLD verification visits and using Halkbank over Ptt, which handles payments for the national social protection system.

⁵⁸ Stakeholder interview 55.

⁵⁹ CaLP (2018) *The State of the World’s Cash Report*.

⁶⁰ WFP Turkey (2017) ESSN presentation to governing board (April 2017).

Alignment with National Social Assistance Policy and Institutions

90. In addition to alignment with Turkish Government refugee policies, the ESSN is anchored in the national social assistance policy and institutions. Turkey has a strong social assistance system, managed by the Ministry of Family and Social Policy's General Directorate of Social Assistance. Assistance comprises several cash transfer programmes, implemented through well established and robust administrative systems and processes. Law No. 3294 provides the regulatory framework for social assistance in Turkey. Under this law, the 1,001 SASFs⁶¹ are mandated to carry out nationwide poverty reduction programmes and provide social assistance to vulnerable people. The SASF application process is summarised in Box 1.

Box 1: Administrative processes set out in the Social Assistance Law

In accordance with the regulations for social assistance, the SASFs screen social assistance applicants by inputting the applicant's national ID number into ISAIS. This provides data on the applicant's occupation, assets and access to social security to determine their eligibility to apply for social assistance. All those who are found to be eligible must then complete an application comprising 49 questions. This is verified through a household visit and the information inputted to ISAIS to calculate a household income score based on the proxy means test methodology. These scores are reviewed and approved by the Foundation Board of Trustees.⁶²

91. The ESSN 'piggybacks' on the national system, as the national SASFs are responsible for accepting and screening applications from TPs, IPs and those with humanitarian residence status for ESSN assistance. However, the ESSN remains conceptually, administratively and financially distinct from the national welfare system.

- Eligibility for enrolment to the ESSN is based on six demographic vulnerability criteria used as proxy measures of welfare, rather than a hybrid between community-based targeting and proxy means testing used for Turkish citizens.
- Another divergence between ESSN and the Turkish system is that the house visits are postponed until after receiving the benefit.⁶³
- There is no direct analogue of household-level transfer targeted to poor households in the Turkish social protection system.
- Cash payments to beneficiaries do not make use of the same financial service providers as the Turkish social assistance programmes. Payments are through the Kızılaykart and a separate agreement with Halkbank, contracted by TRC.

92. Lessons emerging from global experiences in providing humanitarian assistance through national social assistance systems highlight the importance of understanding the capacities of national systems and institutions, and (where necessary) taking steps to strengthen and build capacities to effectively implement such an intervention.⁶⁴ This is important for any programme to ensure timely assistance and to prevent overburdening the existing system. The ESSN design provided temporary operational (surge) support through TRC to reinforce SASF capacities.⁶⁵ Additionally, in areas with high refugee population

⁶¹ Legally independent institutions established in each province and district centre, each governed by a board composed of the district governors, *Muhtars*, representatives from civil society organizations and public institutions working in social assistance, health and education.

⁶² Socialprotection.org (2018) International Conference on Social Protection in contexts of Fragility and Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons, Brussels <https://www.youtube.com/watch?v=US5l4NsShog>.

⁶³ There was a joint decision by stakeholders that HH visits were not always feasible at the required time due to the number of HHs applying and should be completed within 12 months of registration.

⁶⁴ OPM (2018) Shock Responsive Social Protection Systems Research: Synthesis Report.

⁶⁵ While SASFs are solely responsible for receiving applications for all types of social assistance, TRC service centres were entitled to carry out this duty along with SASFs regarding the ESSN.

density, it was planned to establish service centres run by TRC staff to supplement the capacity of the national system to manage the process.

93. It is unclear what (if any) direct support was anticipated by donors or requested by Ministries to bolster the capacities of the state institutions partnering on the ESSN—Ministry of Family and Social Policy and the SASFs responsible for implementation of social assistance. DGMM and Nufus which led on the registration of refugees – an essential prerequisite for eligibility to the ESSN - were supported by UNHCR in the framework of the national registration exercise, supported by DG ECHO.

94. No capacity assessment or process mapping was conducted to track the application process and identify potential bottlenecks prior to the start of the programme. This had important consequences for implementation. As one stakeholder commented:

“The ESSN design underestimated the capacity of the Turkish Government, overestimated the capacity of TRC, and the capacity of other agencies was not looked at, at all”.⁶⁶

The provincial level KIIs did not find evidence of capacity assessments at the local level being conducted by the government (see Annex 11). In contrast, before planning the CCTE, UNICEF conducted a detailed feasibility assessment which examined the strengths, bottlenecks and capacities of the national social assistance institutions, systems and operational processes; this informed their programme design.⁶⁷

2.1.3 To What Extent is the ESSN Coherent with European Union Policies and Strategies?

95. The ESSN design was highly coherent with the European Union strategy for aid in Turkey and was an integral component of the European Union response embedded in an overall results framework of FRiT.⁶⁸ The ESSN was also aligned with the broader aid policies of the European Union that underpin FRiT, with the adoption of the European Union–Turkish JAP in November 2015 being a necessary precursor to the ESSN.

96. The ESSN falls clearly within the overall objective of DG ECHO’s strategy for Turkey to “improve the living conditions of the most vulnerable refugees (and other persons of concern) through predictable and dignified support addressing basic needs and protection”. The ESSN was identified as a priority action with the HIP, providing regular and predictable unrestricted cash assistance for basic needs for registered out-of-camp refugees,⁶⁹ and the HIP prescribed the ESSN implementing structure. This structure was also designed to contribute to HIP strategy by building partnerships with Turkish actors and developing models to address gaps in government services, with a plan for future integration and with appropriate capacity development.⁷⁰

97. As the ESSN is funded by the DG ECHO humanitarian instrument, there is a requirement for the ESSN to be delivered in accordance with the principles of humanity, neutrality, impartiality and independence.⁷¹

⁶⁶ Stakeholder interview 5.

⁶⁷ Smith (2016) *Developing Strategic Options for Building Social Assistance for Syrian Refugees in Turkey: Findings and Policy Options*; Smith (2017) *Approaches to Providing Cash Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey: UNICEF Case Study*.

⁶⁸ DG ECHO (2016) HIP for Turkey.

⁶⁹ DG ECHO (2016) HIP for Turkey.

⁷⁰ DG ECHO (2016) HIP for Turkey.

⁷¹ The principles are founded on the Code of Conduct for the Red Cross and Red Crescent Movement and NGOs in Disaster Relief and International Humanitarian Law.

98. The principle of impartiality demands that “humanitarian action must be carried out on the basis of need alone, giving priority to the most urgent cases of distress and making no distinctions on the basis of nationality, race, gender, religious belief, class or political opinions”.⁷² The ESSN has made concerted efforts to target applicants most in need. While national governments are tasked with vetting eligibility and national registration systems, targeting is based on an objective and automated system and does not rely on subjective judgements at national or provincial levels. Integrated monitoring and accountability mechanisms were designed to provide independent oversight of these activities and identify any breach of impartiality.

99. At the same time, some questions on full alignment with needs-based programming were identified:

- A stated priority for DG ECHO under the HIP is to operate in underserved areas and reach unassisted population groups. The HIP states that “Special consideration will be made for unregistered refugees, where appropriate. Assistance to asylum seekers, migrants, host communities and new arrivals can be integrated over time based on equivalent vulnerability criteria as appropriate and relevant.” However, the ESSN is based on the assumption that all refugees can register, with the potential implication that they remain underserved.
- There is a question regarding whether the decision to adopt an application-based system - as used in the national system - is in line with humanitarian good practice. Potential application barriers related to literacy, disability and marginalization may compromise the ability to reach the most vulnerable.

100. Assuring independence of humanitarian action from “political, economic, military or other objectives”⁷³ was potentially challenging as the EU FRiT married political, developmental and humanitarian objectives. Stakeholders were in broad consensus that the ESSN maintained a humanitarian identity and did not become a political instrument.⁷⁴ Critically, the political objective of migration management primarily relied on other actions, and the ESSN only complemented this policy goal by allowing refugees to live in dignity while residing in Turkey.

101. In recent years, DG ECHO has corporately been promoting the scaling-up of cash transfer programmes through unrestricted multi-purpose transfers as a more efficient and effective means of delivering assistance to meet a range of needs. DG ECHO has developed or funded a range of tools, guidance and collection of evidence on the benefits and limitations of multi-purpose cash grants (MPGs). This has included the DG ECHO global cash and vouchers evaluation; DG ECHO’s ten principles on MPGs; the design of the Enhanced Response Capacity operations manual on MPGs; and the guidance on implementing cash assistance at scale.⁷⁵

⁷² http://www.unocha.org/sites/dms/Documents/OOM-humanitarianprinciples_eng_June12.pdf

⁷³ http://www.unocha.org/sites/dms/Documents/OOM-humanitarianprinciples_eng_June12.pdf

⁷⁴ See, for example, stakeholder interviews 13, 39 and 44, which cited Turkish border controls and the closure of the Balkan route as the principal factors limiting informal migration.

⁷⁵ DG ECHO (2015) 10 Common Principles for Scaling Up Cash-Based Humanitarian Assistance; Maunder *et al.* (2016) *Evaluation of the Use of Different Transfer Modalities in DG ECHO Humanitarian Aid Actions 2011–14*; UNHCR/ERC (2015) *Operational Guidance and Toolkit for Multipurpose Cash Grants*; DG ECHO (2017) *Guidance to Partners Funded by DG ECHO to Deliver Medium- to Large-Scale Cash Transfers*.

102. An analysis of the ESSN shows close alignment with the good practice principles set out by DG ECHO in their policy note. The ESSN design is coherent with the vision and operational model for cash at scale set out in DG ECHO's guidance,⁷⁶ specifically:

“To maximize accountability to DG ECHO and end beneficiaries, management of the resource-transfer component of the ESSN will be entrusted to a single DG ECHO FPA/FAFA⁷⁷ partner with proven technical expertise, and robust administrative and financial practices equalled to the scale of the ESSN.”⁷⁸

2.1.4 Were Appropriate Partnership Arrangements Established to Implement the ESSN?

103. The ESSN was implemented through a partnership between WFP, the national implementation partner TRC and the Ministry of Family and Social Policy, under the coordination of AFAD. Each partner organization had a clear role to play in the programme, while other actors (Halkbank, DGMM and Nufus) also supported implementation.⁷⁹

- Ministry of Family and Social Policy: received applications to the ESSN through the SASF offices and led the eligibility assessment process. Refugees are added to Turkey's social registry, the Integrated Social Assistance Information System (ISAIS) of the Ministry. The ISAIS database provides the backbone for the processing of applications. The network of SASFs, leading on accepting applications, have enabled the ESSN to reach nationwide scale.
- TRC: sensitization of beneficiaries; supported SASF to receive and assess applications through service centres;⁸⁰ contracted the financial service provider; loaded cards; ran the call centre; performed monitoring; supported accountability functions.
- WFP: provided oversight and accountability to donors, technical support and monitoring.
- DGMM and Nufus: provided refugee ID and address verification.
- Halkbank: provided financial services and distributed and loaded ATM cards.

104. Programme documents show that, while the broad partnerships and high-level roles of each actor were defined at the design stage, as of December 2016 the roles and responsibilities established between or within the organizations were not yet clearly defined. This was prioritised in Quarter 1 (Q1); by February 2017, the various roles of and cooperation models between the partners had been clearly defined.⁸¹ In Quarter 2 (Q2), these respective responsibilities were further elaborated through development of formal standard operating procedures (SOPs) for the various business processes.⁸²

105. The involvement of other specialist United Nations agencies was anticipated in the design phase. UNICEF was closely associated to extend the conditional cash transfer to refugees, capitalising on the ESSN architecture. UNHCR was projected to staff protection desks within the SASFs to assess the protection needs of applicants. However, this was not implemented due to restrictions on placing United Nations staff inside government offices. Direct linkages to NGOs, i.e. not mediated through UNHCR, for case management and protection support were not formalized or systematized within the ESSN design.

⁷⁶ DG ECHO (2017) *Guidance to Partners Funded by DG ECHO to Deliver Medium- to Large-Scale Cash Transfers*.

⁷⁷ FPA: Framework Partnership Agreement and FAFA: Financial and Administrative Framework Agreement

⁷⁸ DG ECHO (2016) HIP for Turkey.

⁷⁹ Socialprotection.org (2018) International Conference on Social Protection in contexts of Fragility & Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons, Brussels, <https://www.youtube.com/watch?v=US5l4NsShog>; WFP (2017) ESSN Programme Frequently Asked Questions.

⁸⁰ As of May 2017, there were TRC service centres in Gaziantep, Sanliurfa, Hatay, Adana, Mersin, Osmaniye, Kilis, Kahramanmaras, Mardin, Istanbul and Izmir.

⁸¹ BCG (2017) DG ECHO Presentation.

⁸² ESSN M&E SOP (2017) WFP Turkey; ESSN SOP Application Process (2017) WFP Turkey; ESSN Assessment Process SOP (2017) WFP Turkey; ESSN SOP Protection and Referrals (2017) WFP Turkey.

106. Alternative partnership arrangements were considered for implementing the ESSN and the ultimate decision involved a range of considerations:

- The ESSN was an innovative exercise that relied on untested relationships. As such, it was important for Turkish Government and European Union stakeholders to build trust by including established partners in implementation. The TRC operated as an external auxiliary of the Turkish Government and could bring access to government ministries and systems. WFP provided assurances on accountability to the European Union. The established TRC ‘brand’ also promoted credibility and confidence among among Turkish society and refugees.⁸³
- Both WFP and TRC offered a proven track record on implementation in Turkey. The ESSN was a logical progression in the assistance provided jointly by WFP and TRC, starting with work in camps, through off-camp support through e-vouchers to cash transfers under the ESSN.⁸⁴
- One challenge for the ESSN was balancing the need to keep the number of partners low to maintain efficiency, while still accessing a range of specialist skills.⁸⁵ Several stakeholders felt that UNHCR could have brought greater expertise on protection and ensured a consistent country presence for the duration of the refugee response.⁸⁶
- DG ECHO was legally limited to contracting an approved FAFA or FPA partner.

2.1.5 Was the Design of the ESSN, Including Activities and Outputs, Appropriate and Relevant to the Overall Goal and the Attainment of Its Objectives?

107. The ESSN results framework (as presented in the grant agreement between WFP and DG ECHO) and a ToC developed by WFP (see Box 2) outline the logic of the programme design.

Box 2: The ESSN programme logic

The objective of the ESSN is to support the most vulnerable registered Syrian and non-Syrian refugee households living outside camps in Turkey, to stabilize or improve living standards through provision of monthly cash assistance. The programme aims for the cash transfer to achieve a number of immediate outcomes including meeting their basic needs, ensuring food security of beneficiaries, improving education outcomes and reducing beneficiary debt. Secondary outcomes are also specified: the inclusion of households into the Turkish economy and eventual integration of the ESSN into the Turkish social safety net to promote social cohesion (an objective of FRiT/HIP).

The ToC sets out activities to achieve these outcomes, comprising sensitization of potential beneficiaries, identification and enrolment of eligible households, delivery of monthly transfers, capacity-building of national partners and coordination, monitoring and referrals.

108. The activities can be considered generally well designed and comprehensive as a basis for delivering the outputs and immediate outcomes. However, some important assumptions were missing, which became clear during implementation:

- i. The assistance under the ESSN is only accessible for registered refugees when it is acknowledged that those who are unregistered are among the most vulnerable.⁸⁷ The programme did not sufficiently anticipate the challenges that unregistered households

⁸³ FGD findings.

⁸⁴ Stakeholder interviews 28 & 38.

⁸⁵ Stakeholder interview 23.

⁸⁶ Stakeholder interviews 1, 6, 29, 33, 46 and 60.

⁸⁷ Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*; WFP Turkey (2017) CVME Report (Round 1).

(also some of the most vulnerable)⁸⁸ face in becoming registered and while it sought to assist the registration of refugee HHs, no financial assistance was included for unregistered households.

- ii. There was an acknowledged risk of social tensions between Turkish and refugee populations that the ESSN could potentially further impact on.^{89,90} The programme design incorporated the social cohesion survey to further understand this risk, but did not include specific activities to actively mitigate this risk or foster social cohesion between these population groups (see para. 165).
- iii. Several of the assumptions stated in the ToC (see Annex 4) concern sufficient capacity of implementing institutions and the operational systems for delivering social assistance. There is no evidence that any detailed assessments of these institutions and systems were undertaken; when implementation began, gaps and constraints in these systems became apparent. As such, these assumptions have not been sufficiently tested (see para. 94).
- iv. At a higher level, there is an implicit assumption in the design that the Turkish Government would take on responsibility for the ESSN. However, there is a lack of clarity in the extent to which integration within national systems is an objective and carried through into results activities. This is largely limited to a reference to developing exit strategies as one activity under the capacity-development result.

109. There is no evidence that programme partners used existing gender or protection data or conducted their own specific gender or protection assessments to inform the ESSN design. According to WFP's PRRO document, WFP's Gender Policy 2015–2020 and its regional implementation strategy will be mainstreamed throughout the regional response operation, which includes the ESSN.⁹¹ No programme documentation references gender-specific needs, nor does one show whether or how these needs were incorporated into the design of the ESSN.

110. Monitoring arrangements were well developed in the ESSN design, with monitoring and learning prioritized as a fourth expected result. Comprehensive monitoring activities foreseen included a PAB, monthly output tracking, process and outcome monitoring⁹² and quarterly market monitoring and social cohesion surveys.

⁸⁸ The CVME found that non-applicants are not more likely to be poor in monetary terms than ineligible refugees and are less likely to be poor than beneficiaries. However, non-applicants are more likely to engage in negative coping and have lower food security scores compared to applicants. See Section 4.1.6 in Annex 13 for details.

⁸⁹ Idris and Iffat (2017) *Conflict-Sensitive Cash Transfers: Social Cohesion*. Cash transfers can create social divisions when targeting is carried out on the basis of group identity, when targeting is weak because of corruption and/or mismanagement, or when targeting excludes those who are only marginally less poor.

⁹⁰ For example, Carpio and Wagner analysed the impact of Syrians on the Turkish labour market and determined that the inflow of informally employed Syrian refugees leads to the displacement of Turkish workers from the informal sector (around 6 natives for every 10 refugees: *The Impact of Syrian Refugees on the Turkish Labor Market* [2015]). UNICEF's feasibility study of linked cash assistance to the social assistance system highlighted concerns about the inclusion of refugees when many Turks are very poor and do not benefit from such support (Smith [2016] *Developing Strategic Options for Building Social Assistance for Syrian Refugees in Turkey: Findings and Policy Options*), while similar concerns expressed by the Turkish Government influenced their position on the ESSN transfer value. Cagaptay *et al.* (2014) *The Impact of Syria's Refugees on Southern Turkey*: this highlights the implications of refugee populations in certain provinces altering the ethnic and sectarian balance of the population and potentially stoking tensions. Ozden and Senay (2013) *Syrian Refugees in Turkey*: this concludes that with the influx of huge numbers of Syrians into Turkey, anti-immigrant, anti-Arab discourses have surfaced among some sections of the Turkish public.

⁹¹ WFP (2016) PRRO 200987.

⁹² Tracking implementation progress against planned targets, financial reconciliations, on-site distribution monitoring, phone-based post distribution monitoring surveys with beneficiaries, FGDs, a biannual CVME including non-beneficiaries, and quarterly trend analysis of progress towards the seven ESSN outcome indicators compared to the PAB.

Key findings: Question 1 – Relevance

- The ESSN was designed on the basis of assessed needs for cash by refugee households.
- The transfer amount and number of beneficiaries were also influenced by considerations of resource availability and social cohesion.
- Beneficiary consultation was lacking and the programme was relatively undifferentiated according to age, gender or ability.
- The programme did not sufficiently anticipate the challenges that unregistered households - who are also some of the most vulnerable - would face in becoming registered or include activities to address this.
- The ESSN sought to reduce protection risks by improving access to information and establishing referrals to government social welfare services.
- The response strategy of the humanitarian community (including the ESSN) is aligned with, and supports, Turkish Government leadership.
- The ESSN is anchored on the national social assistance policy and institutions, but remains conceptually, administratively and financially distinct.
- A capacity assessment of TRC was only undertaken after the onset of the programme and no preparatory assessments conducted by partnering state institutions.
- The ESSN design was highly coherent with the European Union strategy for aid in Turkey and included appropriate humanitarian safeguards.
- Relevant partnership arrangements were chosen for implementation, but links to complementary protection services by United Nations agencies and NGO sector were weak.
- The ESSN was generally well designed with a strong M&E framework to track performance. However, the ESSN lacked a mechanism to respond to highly vulnerable refugees unable to apply for ESSN assistance, and there was a lack of clarity around the goal of integration within the national system.

2.2 Effectiveness

2.2.1 What Has Been the Performance in Terms of Targeting and Coverage?

Scale of Coverage

111. The 1 million beneficiary mark was originally intended to be reached in March 2017 and was actually achieved in September 2017. The revised target is 1.3 million refugees, of which the ESSN had reached 1.2 million as of February 2018 (see Figure 2). Of Kızılaykart holders, 49 percent are men and 51 percent are women.⁹³ About 60 percent of the applicant population⁹⁴ were covered by the ESSN, and (based on official numbers obtained from DGMM, WFP and UNHCR) it is estimated that a third of the total refugee population was covered by the ESSN in December 2017.⁹⁵

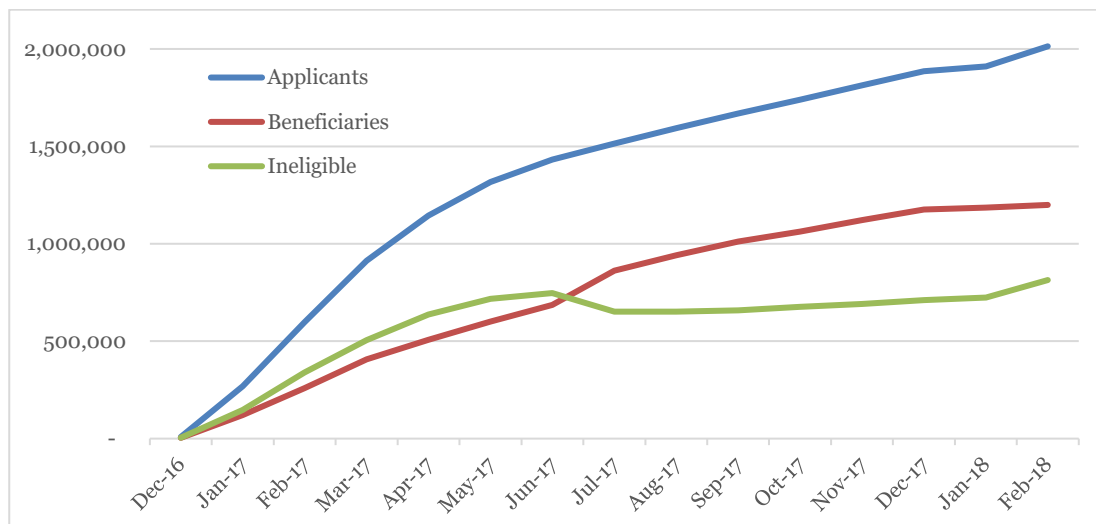
112. The number of beneficiaries represents a significant increase over the coverage of refugees prior to the establishment of the ESSN. Previously, basic needs support was provided to approximately 300,000 refugees (160,000 from the WFP/TRC off-camp Kızılaykart and 140,000 through other NGO basic needs assistance programmes). Consequently, the ESSN was able to increase coverage approximately fourfold. This was enabled by the provision of scaled-up resources by the European Union, although KII interviews with provincial stakeholders noted that this rate of scale-up could not have been achieved without the involvement of Turkish Government institutions (see Annex 11).

⁹³ WFP VAM team (March 2018).

⁹⁴ WFP (March 2018) Programme data provided by WFP staff.

⁹⁵ The estimated coverage may change based on the revised estimate of registered refugees in-country, following the UNHCR supported reregistration exercise.

Figure 2: ESSN registrations (Dec 2016–Feb 2018)



Source: WFP (Mar 2018) Data provided by WFP staff

Application Barriers

113. The application process is described in Annex 5, while the main application barriers are summarized in Figure 3. The communication and sensitization campaign has been generally effective. Only 5 percent of non-applicants reported that they did not know about the ESSN (Figure 3). The evaluation FGDs found a high level of awareness of the ESSN among all refugees, both applicants and non-applicants. The main sources of information mentioned during FGDs were (i) word of mouth, or communication within the neighbourhood; (ii) TRC sensitization activities;⁹⁶ (iii) social media (exclusively Facebook); and (iv) the dissemination of information by NGOs. Only in Istanbul were neighbours less important than other means as a source of information.

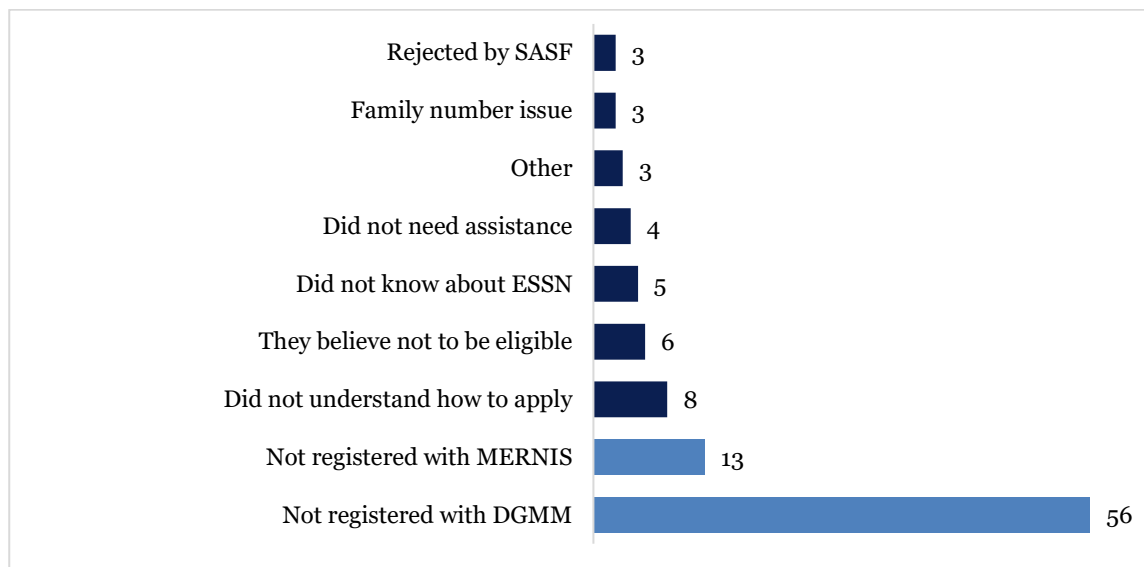
114. The CVME found that not being registered with DGMM (56 percent) or Nufus (13 percent) was the main reason cited by a sample of refugees⁹⁷ for not applying to the ESSN. Many Syrian refugees reported significant delays to DGMM or Nufus registration to evaluators. Capacity constraints and differences in procedures led in some cases to long waiting times for appointments. These problems were most significant in Urfa and Hatay, which had the highest number of refugees of the provinces visited by the evaluation. However, these delays appear to have diminished as the initial surge in applications has passed. Delays are still reported for new arrivals from Syria as registration has been periodically suspended in some border provinces.

115. There were also challenges related to the interoperability of the registration systems. DGMMs are relatively new, established in 2013 as facilities to serve foreigners in Turkey, while population directorates have been in operation since 1924. A data-sharing protocol had not been established between the institutions.

⁹⁶ The TRC has disseminated ESSN information through its social workers in targeted neighbourhoods. One beneficiary mentioned: “They were visiting our neighbourhood, and they were holding house visits. Then, two years ago, they visited my house as well and informed me about the programme.”

⁹⁷ Note that the sample is not representative of the refugee population.

Figure 3: Reason for not applying to the ESSN



Note: percentage of non-applicants [N=120]

Source: CVME, authors' calculations

116. Registration issues with DGMM included: (i) newly arrived and other refugees awaiting registration,⁹⁸ (ii) refugees who have physically moved from the province where they originally registered and have not been able to move their DGMM registration, and (iii) registration of split families. There is also a challenge in moving the DGMM registration to a new province, especially to provinces reluctant to accept additional TPs (such as Istanbul and Izmir).

Box 3: Beneficiary reports on Nufus registration challenges

Many refugees do not have an official lease to obtain Nufus registration. “There are no leases here. You can only get a lease document if you rent your apartment from a real-estate agent. I cannot afford that” (beneficiary Syrian woman, Urfa).

Another problem is convincing the landlord to come all the way to the population directorate: “I went to the population department with the water bill receipt. Then they told me to bring the landlord, and we asked the landlord to come but he wouldn’t unless we paid him. He wanted TL 500 or TL 1,000, and still he wouldn’t come. We went back to them and informed them about the situation. They said, ‘Stay at home, and we will send you the police; we will register you if you are living in the house.’ I agreed. The police did not come. I went back to ask them why they had told me to stay at home and wait; it has been four months now, and I am still waiting” (non-applicant Syrian man, Urfa).

117. Refugees living in informal accommodation, or refugees who do not have an official lease, reported challenges in getting their physical address verified by Nufus (see Box 3).⁹⁹ The ESSN Taskforce engaged with Nufus to find solutions to these challenges, and a circular was issued to introduce greater flexibility in address registration.¹⁰⁰ Individual cases have also been followed up with DGMM by the ESSN partner agencies. However, some technical challenges still need to be resolved. For example, refugees who have been victims of sexual violence may be housed in womens’ hostels that have confidential addresses and cannot be registered in the Nufus system, thus prohibiting these women from applying to the ESSN.

⁹⁸ CVME data shows that non-applicants are much more likely to have arrived recently and not to be registered with DGMM (See 4.1.6 in Annex 13).

⁹⁹ WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017; WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017.

¹⁰⁰ Informal Housing MERNIS Registration Policy Note (2017).

118. Some of those living with a disability reported problems in accessing the required documentation (the Disability Health Report),¹⁰¹ and illiterate households¹⁰² struggled with the application form.¹⁰³ These challenges were discussed by the ESSN Taskforce and solutions were proposed.

119. Through the regular management meetings and meetings of the ESSN Taskforce, co-chaired by WFP and TRC, and relevant sub-working groups, these issues were discussed and solutions identified, including negotiating actions with programme partners and other external stakeholders and modifications to the programme design. This included:

- i. Prioritizing sensitization activities to raise awareness of the programme and how to apply it.¹⁰⁴ Engagement of community leaders and Muhtars to support the provision of information to applicants and manage crowds.¹⁰⁵
- ii. Advocacy with DGMM, in collaboration with UNHCR.¹⁰⁶
- iii. Agreeing with Nufus on ways to support the address registration of those refugees living in informal accommodation and shared housing arrangements.¹⁰⁷
- iv. Introduction of complementary ‘handholding’ support for application and enrolment within the ESSN and also through other projects by humanitarian actors funded by DG ECHO and other donors, including cover of the cost of transport, notaries and interpreters.¹⁰⁸
- v. Fast-tracking establishment and staffing of TRC service centres, and provision of translators to increase capacity of programme registration.¹⁰⁹
- vi. Recruitment of interpreters by TRC for deployment to SASFs, use of volunteer interpreters in some sites.
- vii. Regional training for all SASFs; on-site briefings to SASF staff by WFP.
- viii. Engagement with the Protection Working Group and establishment of a new taskforce to provide guidance and advocacy to improve the process of disability health report applications and increase knowledge of the disability health report application process among all relevant organizations, including SASF staff, NGOs and health and medical staff.¹¹⁰

120. An important factor mentioned by FGD participants in facilitating applications was the availability of translators in the TRC and other institutions, such as the DGMM. The participants especially appreciated the facilitation of translators at TRC service centres; a Syrian woman in Izmir reported: “The best place to make your application is the Red Crescent centre. They speak Arabic and Kurdish. They are very nice and easy-going because they are speaking our language.” The language problem was more acute for Iranian and Afghan IPs, as Pashtun and Farsi interpreters were rarely available and ESSN communications were initially in Turkish and Arabic, although this adapted over time.¹¹¹

¹⁰¹ WFP Turkey (2017) *Report on Online Survey on Disability Health Report*; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017. The financial costs of the report, and importantly the required tests, is reportedly a barrier to application. Furthermore, disability appears to be primarily gauged by physical disability, rather than the mental trauma experienced by the victims of conflict.

¹⁰² CVME data finds that non-applicant households are significantly more likely to have a household head who has less than primary education (See Section 4.1.6 in Annex 13).

¹⁰³ CaLP (2018) *The State of the World’s Cash Report*; WFP Turkey (2017) CVME Report (Round 1).

¹⁰⁴ BCG (2017) DG ECHO Presentation; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

¹⁰⁵ WFP Turkey (2017) Report Monitoring Debrief FMAs.

¹⁰⁶ WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017; WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017; CaLP (2018) *The State of the World’s Cash Report*.

¹⁰⁷ WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017; WFP Turkey (2017) Informal Housing MERNIS Registration Policy Note.

¹⁰⁸ CaLP (2018) *The State of the World’s Cash Report*; ESSN presentation to governing board (April 2017) (2017) WFP Turkey; Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

¹⁰⁹ BCG (2017) DG ECHO Presentation; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

¹¹⁰ WFP Turkey (2017) Disability Health Report Guidance Note, with annex; WFP Turkey (2017) *Report on Online Survey on Disability Health Report*.

¹¹¹ Stakeholder interview 72.

Targeting Criteria

121. Consistent with humanitarian principles, the ESSN aimed to reach the “poorest and most vulnerable” in a timely manner, while minimizing inclusion and exclusion errors. At the same time, the scale of the refugee crisis in Turkey and the objective of rapidly scaling-up to reach over a million refugees meant that the targeting approach needed to be capable of identifying a large number of refugees in a short timeframe. It also needed to work in a context without socio-economic profiles of refugees, and where targeting was linked with national processes.

122. In Turkey, eligibility for social assistance is based on a range of predefined socio-economic and demographic criteria. It was agreed with the Ministry of Family and Social Policy that, given the lack of verifiable socio-economic data on refugees and the need for rapid scale-up, these were not appropriate targeting criteria for refugees.¹¹² Stakeholders were also concerned that, using Turkish Government criteria, nearly all refugees would qualify for assistance.¹¹³

123. Eligibility for the ESSN was based on six demographic criteria as proxy indicators for vulnerability (see Annex 6). The use of easily verifiable demographic criteria satisfied the donors need for transparency and accountability. Based in the preset objective of reaching 1 million refugees, the ESSN used the off-camp baseline data to determine which combination of demographic criteria to use, which was the largest refugee dataset available at the time. In Hatay, an SASF director said:

“The final decision is based on the demographic eligibility criteria. We do not make a decision. It is also the same for the house visits. We do that because we are told to. However, we have no right to make any changes if one applicant fulfils the criteria. We only transfer the decision to the centre (HQ).”

124. In addition, the ESSN uses the same exclusion criteria used in the MoFSP national system. In Istanbul, an SASF directorate summarized this as follows:

“Even though they look as though they meet the demographic eligibility criteria, if they have a recently bought car, the committee does not approve their beneficiary status. They also look at whether they have an active tax record. If one has these kind of records, the committee may eliminate them due to not being in need.”

125. The criteria relating to the dependency ratio and having large families were most effective at identifying poor households, although being a single female was not seen to be strongly correlated with poverty (see Annex 13).¹¹⁴ The evidence shows that the targeting approach was mildly progressive, and that a larger proportion of the benefits of the ESSN were received by the poorer refugee applicants (see Figure 4). Before the transfer, beneficiaries were more likely to engage in emergency coping strategies (43 percent of eligible households, compared to 32 percent of non-beneficiary households).¹¹⁵ Household visits were conducted in beneficiary households following the normal SASF procedures. Given the automatic nature of the ESSN entry criteria, it is unclear whether these visits, conducted at significant cost (para. 180), will contribute to improved targeting.¹¹⁶

126. The targeting criteria only have limited ability to discriminate. Figure 4 demonstrates both the progressive nature of the targeting, and the limitations of the targeting approach. The objective of the ESSN was stated as targeting the most vulnerable 40 percent of the

¹¹² The household verification visits which are part of the Turkish application process, were postponed for ESSN applicants in the interests of improved timeliness.

¹¹³ Stakeholder interview 65.

¹¹⁴ See the PAB analysis in Section 4.1.3 in Annex 13.

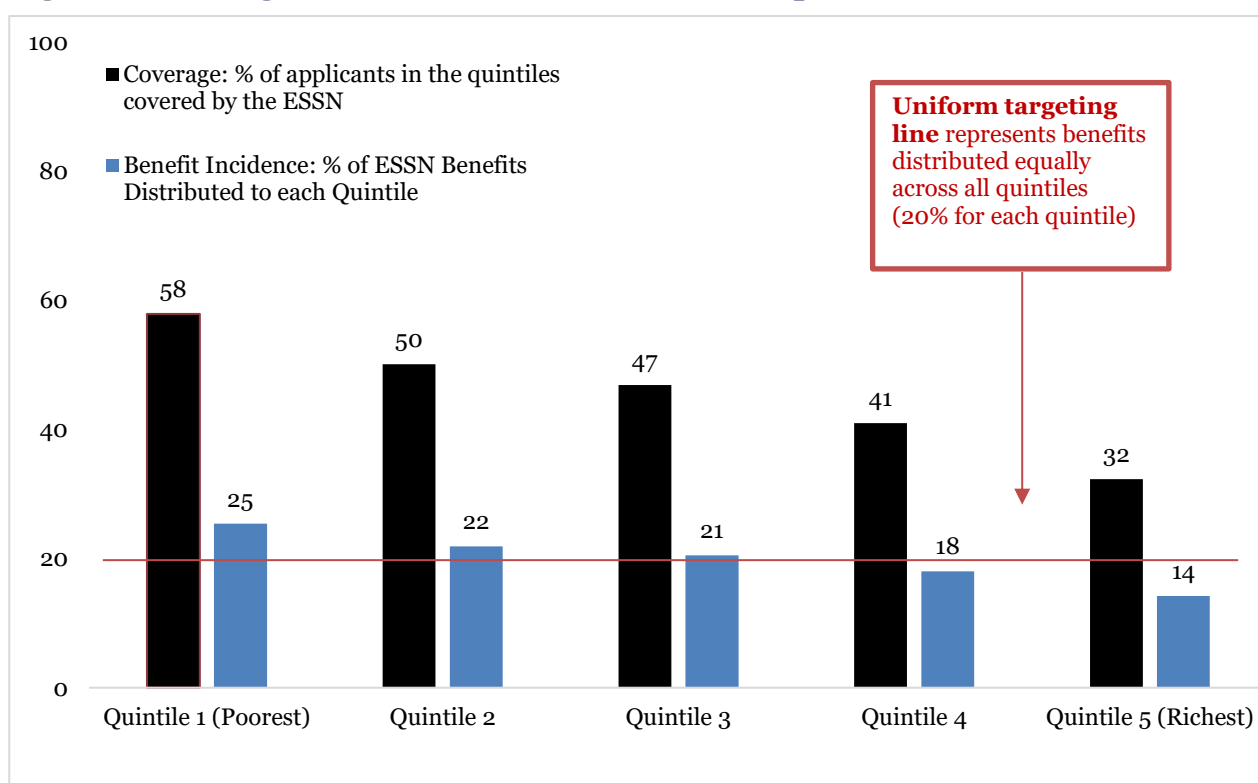
¹¹⁵ See Figure 35 in Annex 13. PAB emergency coping strategies include sending members back to Syria, begging, sending children to work, and moving the entire household elsewhere.

¹¹⁶ However, it should be noted that these visits are dual purpose - vulnerability assessment and verification- ie. does this household still exist at this address?

refugee applicants. Based on ESSN data, it can be seen that the poorest 40 percent of refugees received 47 percent of the total transfers, meaning that the ‘untargeted’ 60 percent of refugees still received 53 percent of the total transfers.¹¹⁷ The targeting strategy does favour the inclusion of households who are more likely to use consumption coping, more likely to use any type of livelihoods coping, have a higher livelihood coping strategy index, and are more likely to rely on unskilled labour and remittances.¹¹⁸ However, overall the vulnerability profile of included and excluded households is very similar (compare the dotted lines in Figure 6).

127. The data shows that the vast majority of the refugees are poor and there is a high degree of homogeneity in the distribution of expenditure,¹¹⁹ with 80 percent of the refugees falling below the MEB threshold. There is very little difference between the profile of most households falling above or below a notional targeting threshold (see Figure 5).¹²⁰ Furthermore, the fluctuating and uncertain incomes of refugee households mean households regularly move above and below the poverty line, making the ‘target’ group dynamic. Inevitably, the ability to accurately target the poorest proportion of a relatively homogenous group will be limited.¹²¹ Therefore, any discussion of exclusion and inclusion ‘errors’ needs to be heavily contextualized.¹²²

Figure 4: Coverage and benefits distributed to each quintile



Source: PAB data; quintiles of expenditure are constructed using adult equivalence scales and economies of scale (Organization for Economic Cooperation and Development (OECD) AES2 definition: for each additional adult=0.7 and each child 0.3)

¹¹⁷ See Annex 13 section 4.1.5 for a comparison of ESSN targeting and random targeting.

¹¹⁸ See Annex 13 section 4.1.2 for a discussion of vulnerability profiles.

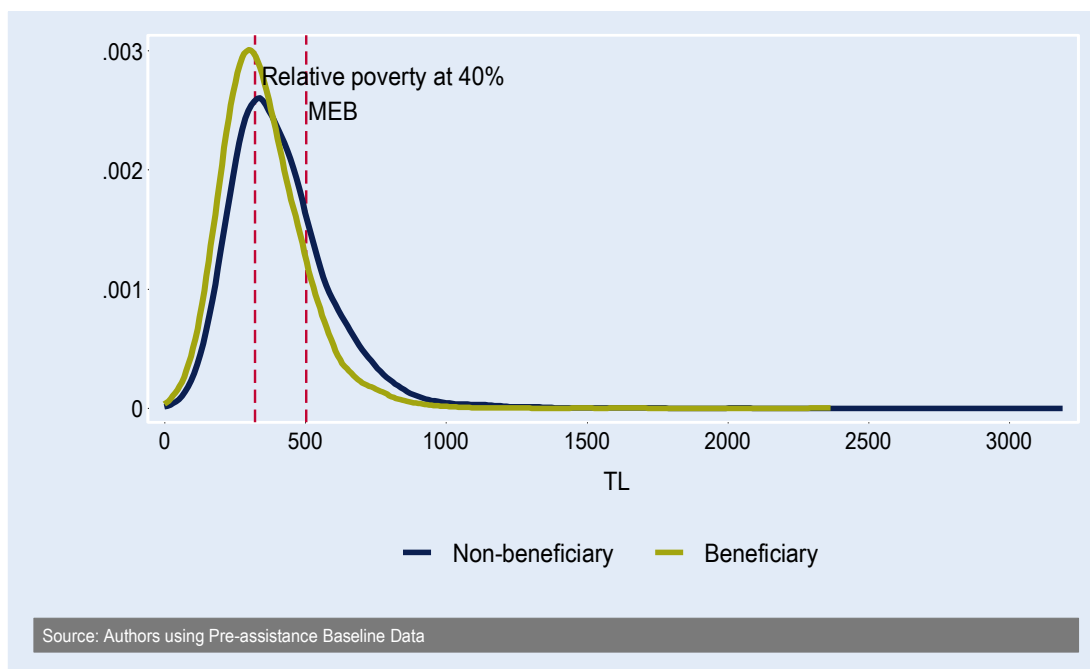
¹¹⁹ Measured per adult equivalents. See Annex 12 for details.

¹²⁰ For an exhaustive analysis of targeting effectiveness for the ESSN, see Section 4.1 in Annex 13.

¹²¹ Interestingly, World Bank data suggests that the ESSN performs on par with other social protection systems.

¹²² In particular that the proportion to be reached was defined from the outset at 40 percent and that the overall budget envelope was finite.

Figure 5: Distribution of per adult equivalent consumption expenditure



128. There was strong agreement across sources that original targeting criteria were too strict. Stakeholders across all groups (government, United Nations, donor and NGO) had a common perception that the original criteria led to the exclusion of too many highly vulnerable refugees (see Box 3).¹²³ Some stakeholders argued that, from a needs-based perspective, the 40 percent coverage target was arbitrary and initial transfers should have been universal, with targeting only introduced at a later stage as refugees established themselves in-country. An SASF administrator explained:

“I find these demographic criteria simplistic and insufficient. I do not believe that these criteria indicate socio-economic hardship. Let’s take the dependency ratio criterion as an example. If there are three children and two adults in the household, they are eligible. What if their children are older than 18 but that they are all girls? They are ineligible. I know a household like that where the mother is a single parent and she has 6 daughters all older than 18. But they do not meet the requirements. I do not think this is right. These conditions need to be revised and improved.”

129. Other stakeholders offered counter-arguments about the importance of targeting from the start in the interests of sustainability.¹²⁴ Findings from the complaints mechanism¹²⁵ and other programme monitoring processes informed discussions by the Taskforce’s Targeting Working Group.¹²⁶ Consequently, in June 2017, the targeting criteria (the number of disabled household members and the dependence ratio) were relaxed, with the aim of reaching 49–50 percent of the refugee population.¹²⁷ The transfer value was also modified to reflect differentiation of needs according to household size. Monitoring reports in June 2017 showed that the number of beneficiaries was starting to increase as a result (see Figure 2).¹²⁸ However, the new eligibility criteria expanded coverage without having a strong impact on the progressivity of the transfer (see Annex 13).

¹²³ Stakeholder interviews 5, 6, 14, 22, 24, 25, 28, 29, 37, 51, 52, 53, 65 and 70.

¹²⁴ Stakeholder interviews 35 and 55.

¹²⁵ A complaints mechanism is a channel that allows applicants and beneficiaries to raise feedback and make a complaint. It is distinct from an appeals mechanism, which is a channel that allows applicants to formally contest and seek to reverse a decision made on their application.

¹²⁶ WFP Turkey (Feb 2017) ESSN Targeting Working Group; WFP Turkey (Apr 2017) ESSN Targeting Working Group.

¹²⁷ ESSN targeting WG PowerPoint Feb 2017; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

¹²⁸ WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

130. A further modification was the inclusion of a “discretionary allowance” for SASFs as a way to support vulnerable cases that do not meet the programme’s demographic criteria. While the details are still being agreed, in principle cases would be proposed by the SASF for further approval by programme partners.¹²⁹ Some stakeholders argued that more trust in the strength of national systems at the beginning would have allowed for the earlier introduction of an element of subjectivity to reduce exclusion errors.¹³⁰

131. Beneficiaries themselves tended to disagree with the ESSN targeting criteria and would rather have seen a larger number of refugees reached, even with a smaller amount. Out of 63 beneficiaries who attended FGD discussions, 52 stated that the transfers need to cover all Syrian refugees, regardless of eligibility criteria. Only, 11 would object to achieving this at the cost of a decrease in the transfer amount. Non-beneficiaries voiced similar concerns and argued that the coverage should be universal or targeting improved through better socio-economic criteria.¹³¹

2.2.2 To What Extent Were the Intended Services Delivered?

132. Successful applicants reported that the process of notification and receiving their transfers proceeded smoothly. FGDs found that successful applicants were informed of entitlements promptly and within specified target time limits. However, it was reported that the SMS messages were sent in Turkish and Arabic, limiting effective communication with IP caseloads. The increasing complexity of entitlements (with quarterly top-ups and CCTE payments made on the same card) also risked creating some confusion among beneficiaries (see Box 4).

133. The delivery of ATM cards by Halkbank appears to have been handled smoothly,¹³² although congestion and queues were reported in the early period when the bulk of cards were distributed. Some challenges were noted due to a lack of staff speaking Arabic within Halkbank branches and ATM machines’ interfaces (where information was provided in Turkish language only), although it is understood this latter issue has now been addressed.

Box 4: CCTE and ESSN payment schedules

The payment schedule of the CCTE mirrors that of the ESSN for Turkish citizens and is different to the schedule on the ESSN. Both payments are delivered to beneficiaries through the same ATM card, through separate wallets. Complexities are likely to grow as the transfer value of ESSN has now increased, along with the provision of quarterly top-ups that vary according to household size. This requires careful explanation by SASF and TRC staff. SMS messages are also being disseminated to raise awareness.¹³³

134. FGD participants reported that cash transfers to both Syrian and non-Syrian beneficiaries have been delivered reliably. Beneficiaries received their money either at the beginning of the month or on the last day of the month, depending on the SMS message they received.¹³⁴ Since these cash transfers are essential in meeting people’s obligations, the timely delivery of cash transfer is critical. As one beneficiary stated: “I receive my money on the first day of the month. There are rent and utility bills waiting; my first thing is to pay the rent and utility bills immediately.”

¹²⁹ KII notes: WFP (August 2017) Smith; WFP Turkey (April 2017) ESSN Presentation to Governing Board; WFP Turkey (April 2017) ESSN Targeting Working Group FINAL.pdf; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

¹³⁰ Stakeholder interviews 5, 37, 41 and 51.

¹³¹ This is confirmed by quantitative data. The CVME found that only one third of the sample thought that the ESSN is successfully reaching all or most of the vulnerable. Even among the beneficiaries, only 52 percent of them think that the ESSN is covering the most vulnerable (See Table 34 in Annex 13).

¹³² Provincial level KIIs, stakeholder interview 20.

¹³³ CaLP (2018) *The State of the World’s Cash Report*; Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

¹³⁴ The TRC centre sent SMS messages to a certain number of people, assigning each group a different day to prevent queues in the bank.

135. The PDM found that only 5 percent of beneficiary households reported a problem in redeeming the ESSN transfer. The most frequent problems included the ATM retaining the card, a lack of understanding of how to withdraw money from the ATM and a lack of money at the ATM (see Section 4.2 in Annex 13). Beneficiaries confirmed that the amounts received tallied with their entitlements. Some challenges to accessing ESSN transfers were reported by specific vulnerable beneficiaries. Some, especially the elderly, the disabled and those in remote areas, have faced challenges in accessing ATMs.¹³⁵ Whereas the Posta ve Telgraf Teşkilatı (Ptt)¹³⁶ provides a “doorstep service”, with cash transfers delivered directly to disabled households¹³⁷ as part of the Turkish Government’s social assistance system, such a service is not provided by Halkbank¹³⁸ although this service has been provided by TRC where needed.

136. There is evidence of gender-specific issues turned up by early programme monitoring activities. For example, it was reported that in some households, men were taking control of the cash, and some women complained of a lack of money to spend on food as a result.¹³⁹ A number of cases were identified by NGOs and reported to the call centres of husbands absconding with the card and leaving women and children without support, or of women and children forced to leave home due to domestic violence.¹⁴⁰ In such cases, if the man is the registered card holder, families may be left without support.¹⁴¹

137. Through programme monitoring and accountability activities, some protection-related risks on the ESSN were identified. These included challenges around access; uneven adherence to application procedures by SASF staff; security challenges due to overcrowding at TRC service centres; and protection risks related to cash disbursement (such as landlords accompanying some beneficiaries to the ATM; crowding and tension reported at some ATMs; and vulnerable cases relying on others to access ATMs and losing some of their benefit in the process).¹⁴²

138. Changes have been made to programme design and/or complementary programmes have been designed to address some of these issues. For example, good practices were developed to address overcrowding (using *Muhtars* to distribute forms; queue control; verbal briefings; appointment systems; etc.);¹⁴³ negotiations by TRC with Halkbank to include Arabic as a language in their ATM service;¹⁴⁴ measures introduced to ensure crowd control and to reduce burden on Halkbank branches;¹⁴⁵ and various measures to reduce barriers to enrolment for vulnerable groups.

139. Allegations of fraud and misuse of assistance were almost non-existent. Of a total of over 400,000 calls to the ESSN hotline, only 8 were classified as relating to potential fraud. An example case involved a Syrian community leader redistributing ESSN transfers within a specific community in the interests of equity (i.e. including those otherwise excluded), but without the agreement of some of those affected.

¹³⁵ WFP Turkey (2017) Presentation DG ECHO Mission Coord AAP Protection.

¹³⁶ The national post and telegraph directorate of Turkey.

¹³⁷ Socialprotection.org (2018) International Conference on Social Protection in contexts of Fragility and Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons, Brussels, <https://www.youtube.com/watch?v=US5l4NsShog>; Smith (2016) Developing Strategic Options for Building Social Assistance for Syrian Refugees in Turkey: Findings and Policy Options.

¹³⁸ Although it is understood that TRC itself takes on this responsibility in some locations (for example Samsun, Erzurum and Van).

¹³⁹ WFP Turkey (2017) Presentation DG ECHO Mission Coord AAP Protection; WFP Turkey (2017) Report Monitoring Debrief FMAs.

¹⁴⁰ Stakeholder interviews 32 and 72.

¹⁴¹ According to CVME and PDM data, there is no evidence of disagreement within the household caused by the ESSN (see Section 4.5 in Annex 13).

¹⁴² WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017; WFP Turkey (2017) Presentation DG ECHO Mission Coord AAP Protection; WFP Turkey (2017) Report Monitoring Debrief FMAs.

¹⁴³ WFP Turkey (2017) Report Monitoring Debrief FMAs.

¹⁴⁴ Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

¹⁴⁵ WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017.

2.2.3 Did the Feedback and Appeals Mechanisms¹⁴⁶ Function Effectively?

Communication Channels

140. The programme sought to embed communication mechanisms from the outset and invested in outreach communication through a range of channels. Led by TRC this included printed materials in appropriate languages distributed through SASF, service centres, community centres and NGOs; an ESSN website, Facebook page and WhatsApp groups; and a free-of-charge helpline providing information in six languages for receiving and resolving queries and complaints. The content of the material included details about the programme, the organizations involved, the support available, eligibility and who can apply, the application process, and the call centre.¹⁴⁷

141. These mechanisms were not functioning at the outset of the programme. As of December 2016 there were few accountability mechanisms functioning,¹⁴⁸ but these have been set up progressively during the first year of implementation. The call centre was established in December 2016 but struggled with high call volumes,¹⁴⁹ and the website was established in Quarter 3 (Q3).¹⁵⁰

142. Monitoring reports early in the programme confirm the initial absence of communication. For example, in Q1 there was a lack of awareness among affected populations about the helpline and wait times were between 30–60 minutes; information being provided by the operators was found to be insufficient, unclear or even incorrect. This resulted in a lack of knowledge about the ESSN, including the role of different actors and the application process.¹⁵¹ Furthermore, communication and sensitization of SASFs was also weak, meaning staff lacked basic knowledge of the ESSN programme and were not consistently applying the correct processes for receiving and assessing applications.¹⁵²

143. These initial weaknesses were attributed to a lack of capacity and dedicated responsibility for beneficiary communications within TRC early in the programme, and a lack of agreed processes.¹⁵³ The Boston Consulting Group (BCG) capacity assessment conducted in February 2017 recommended that such roles were established as a matter of priority.¹⁵⁴ Since then, the programme partners have increased emphasis on sensitization activities for communities and SASFs, and have established clear guidelines for management of the social media communications and the overall communication and sensitization methods.¹⁵⁵

144. Once properly established, the online and phone communication channels were accessible and well-used by the target population,¹⁵⁶ with evidence that they are successful in addressing the needs of refugees (see Box 5).¹⁵⁷ The wait time for responses on the helpline

¹⁴⁶ An appeals mechanism is a channel that allows applicants to formally contest and seek to reverse a decision made on their application. It is distinct from a complaints mechanism, which is a channel that allows applicants and beneficiaries to raise feedback and make a complaint.

¹⁴⁷ Smith (2017) Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey; CaLP (2018) The State of the World's Cash Report; Socialprotection.org (2018) International Conference on Social Protection in contexts of Fragility and Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons, Brussels, <https://www.youtube.com/watch?v=US5j4NsShog>.

¹⁴⁸ BCG (2017) DG ECHO Presentation.

¹⁴⁹ WFP Turkey (2017) Report Monitoring Debrief FMAs.

¹⁵⁰ WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017.

¹⁵¹ WFP Turkey (2017) Report Monitoring Debrief FMAs.

¹⁵² WFP Turkey (2017) Report Monitoring Debrief FMAs; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

¹⁵³ BCG (2017) DG ECHO Presentation.

¹⁵⁴ BCG (2017) DG ECHO Presentation.

¹⁵⁵ Sensitization Concept Note (2017) WFP Turkey; Facebook Guidelines (2017) WFP Turkey

¹⁵⁶ By September 2017, the call centre had logged over 363,000 calls and the Facebook page had over 53,000 followers. The website had over 23,000 followers (WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017).

¹⁵⁷ According to CVME data only 48% of the respondents are aware of feedback mechanisms. Even among beneficiary households understanding of how to get assistance is limited with almost 40% of the respondents unable to explain whom to contact (See Section 4.3 in Annex 13).

and Facebook page were noted to be good, and social media channels were appreciated by beneficiaries.¹⁵⁸

Box 5: Beneficiary experiences of the using the ESSN hotline

The majority of FGD participants (29 out of 33 who answered the question) shared positive feedback about their experience with the TRC call centre; a few complained about a long waiting time or disconnection after waiting on the line. The participants explained their satisfaction especially in being informed about the reasons for their rejection. Even when they were rejected, they were far more understanding about their exclusion when the TRC call centre staff took the time to explain the reasons behind it to them and were grateful that if it was fixable, the call centre would guide them through. One of the participants explained:

“I got rejected at first and called 168. They told me that there were not enough people in my house to be eligible. But then they found out that my ID number was wrong, not correlated with my family ID. They guided me to the address that I needed to visit to correct my ID number.” (Beneficiary Syrian man, Izmir.) Another added, “My experience was nice. I asked about my children and about us, and how to get assistance. They told me the necessary steps.” (Non-applicant Syrian woman, Istanbul.)

145. Most calls have been information requests, usually on application processes. A smaller number of complaints were received, mostly applicants querying why they were rejected. This information contributed to revisions of the targeting criteria to make the programme more inclusive. The call centre referred protection-related calls to the TRC protection staff (who are funded separately from the ESSN).¹⁵⁹

Appeals Mechanism

146. An appeal mechanism was specifically requested in the design stage of the programme but as this is not part of the Turkish mechanism, it was not agreed on by the Ministry of Family and Social Policies. In case of rejection, the only option open to beneficiaries was submitting a new application, either based on feedback from SASF or TRC staff or their own decision. One female beneficiary said in an FGD:

“You have to register all over again. The officials rejected my application, and I revisited their office and resubmitted all of my documents. We got the benefit after we had tried five or six times. Thank God!”

Another beneficiary shared pretty much the same experience with the one in Urfa:

“I just went to check the status of my application. I gave them my ID; they said, your application was not accepted; you have to register again. So I started all over again. I started a new application by visiting the General Directorate of Population and made the house registration.”

147. One of the SASF directors we met talked about this issue and made a recommendation as follows:

“If someone has been rejected, there should be a way for them to appeal. After that, the committee (Board of Trustees) would re-examine their case. At that stage, if the applicant is decided to be in need yet rejected due to demographic eligibility criteria, then the committee could take an initiative to make them eligible.”

This is, in essence, the role of the agreed discretionary allowance.

¹⁵⁸ In September 2017, wait times were three minutes for the call centre (Socialprotection.org (2018) International Conference on Social Protection in contexts of Fragility & Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons, Brussels, <https://www.youtube.com/watch?v=US5l4NsShog>) and 1 hour for the Facebook page (WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017).

¹⁵⁹ Stakeholder interview 66.

148. This situation was not made easier by the fact that the ESSN targeting criteria were only made public in May 2017. Prior to this, Turkish Government and TRC staff were unable to advise applicants of the reason for their rejection, or to establish whether they had grounds for appeal. While SASF and TRC staff are now in a position to share this information, no formal appeal mechanism has been established.

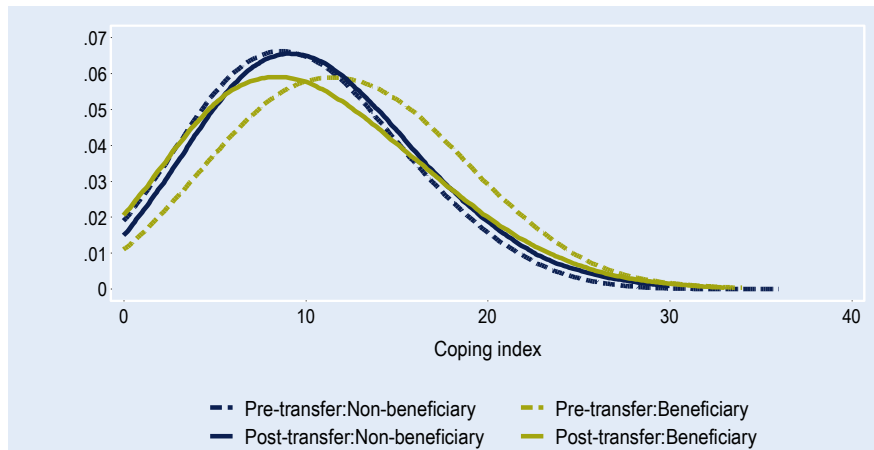
2.2.4 What Outcomes are Associated with the ESSN Transfer?

Changes in Food Security, Coping Strategies and Indebtedness

149. The PDM confirms that, post-transfer,¹⁶⁰ ESSN beneficiaries are better off in terms of food security as measured by their food consumption score, while the food security of non-beneficiaries has declined. Debt has reduced after transfer for beneficiaries, with average debt per adult equivalent falling by TL 57 among beneficiaries and rising by TL 81 among non-beneficiaries.¹⁶¹

150. ESSN beneficiary households are post-transfer less likely to use stress, crisis and (especially) emergency negative livelihood coping strategies compared to the pre-transfer period.¹⁶² The opposite is true for non-beneficiary households. Coping strategies mentioned by participants in FGDs were (i) working long hours with low salary and without any insurance; (ii) reducing both the quality and the quantity of food consumption; (iii) borrowing from relatives and shops in their neighbourhood; (iv) taking their children out of school; (v) living in substandard housing; and (vi) selling their assets. In terms of coping strategies, beneficiaries leapfrog non-beneficiaries – ESSN beneficiary households go from being worse off than non-beneficiary ones pre-transfer, to being better off post-transfer (see Figure 6).

Figure 6: Distribution of coping index pre- and post-transfer by beneficiary status



Source: PAB and PDM; panel data with households that have the same beneficiary status in both rounds

151. Beneficiaries in FGDs reported that the transfer was principally used for house rent, buying and consuming better quality and variety of food, sending their children back to school, and paying back their debts and not borrowing any more. Out of the 90 beneficiaries who answered the question on whether receiving ESSN makes any difference, 30 said it went straight towards rent and gave significant relief to their budget. One beneficiary stated:

“Without the help of the Red Crescent card, we would not be able to survive. We would already have been kicked out of our house. Before the card, we were not able to pay our rent” (beneficiary Syrian woman, Hatay).

¹⁶⁰ PDM data shows that beneficiary households received TL 771 per household and TL 117 per person on average and 20% of households state that ESSN is their main source of income. See Section 4.2 in Annex 13.

¹⁶¹ We have treated PDM and PAB data as repeated cross-sections. See Section 4.4 in Annex 13.

¹⁶² See table 41 in Annex 13.

Before receiving ESSN, most of them said that they had either borrowed money or delayed payment. The ESSN allowed them to pay the rent on time and without relying on anybody:

“Before the card, I would not have been able to pay the rent. I either delayed payment or borrowed money but now, it is much better” (beneficiary Syrian man, Izmir).

152. PDM data shows that ESSN beneficiary households are post-transfer more likely to keep children in school preserving them from having to work and that they are less likely to have to cut education expenses. On the contrary, non-beneficiary households are more likely to withdraw their children from school post-transfer and to reduce education expenditure.

153. The expenditure levels of beneficiaries are still not reaching the MEB. In Q2, the findings from market monitoring showed that the initial transfer value was insufficient to meet basic needs.¹⁶³ Beneficiaries’ subjective opinion on the adequacy of the ESSN transfer (as reported in the PDM) differed according to the question asked. Post-transfer, 97 percent of beneficiary households reported they were satisfied with “the quantity (amount) of ESSN provided” but, at the same time, 44 percent of them thought the amount was not sufficient “to cover their household’s basic needs”. These different answers to similar questions might be due to how the question was worded and perceived by the respondents. See Section 3.2 in Annex 13.

154. The informal understanding was that the ESSN transfer would be reviewed and adjusted for inflation every two years in line with the practice for Turkish social transfers.¹⁶⁴ Although inflation is running at significant rate (consumer prices in Turkey increased 10.26 percent year on year in February 2018),¹⁶⁵ the decision to increase the transfer amount in June 2017 has mitigated inflationary pressures.

Access to Education and Health Service

155. In FGDs, beneficiaries noted that the ESSN (rather than specifically the CCTE) gave them the means to pay transportation fees and buy school supplies:

“I have four children, and all of them are attending school. The Kızılaykart helped me a lot to buy their school supplies since they need notebooks, pens, textbooks. I also top up their transportation cards every month and buy their uniforms once a year” (beneficiary Syrian woman, Urfa).

A few shared their stories of how the ESSN helped them send their children back to school:

“My son worked for a while to take care of the family. When I heard about the Kızılaykart, I applied, and they told me to send my children to school. It has been a year since we started to benefit, and my son started to attend the school. There is a big difference. I asked him which one is better, work or study. He replied that school is better” (beneficiary Syrian woman, Istanbul).

“I was working, I had to work and my older children (a 15-year-old boy and an 11-year-old girl) took care of my baby (aged 3). The Kızılaykart means I can afford to stay at home and send my children back to school. When I got the payment for the first time, they started attending school” (beneficiary Syrian woman, Afyon).

156. Based on CVME data, there are no significant differences between beneficiary and non-beneficiary households in terms of the usage of health services. Of households with a sick member, 90 percent sought medical treatment, and of those the overwhelming majority went to a government hospital (See Table 40 in Annex 13). During the FGD discussions, both beneficiaries and non-beneficiaries appreciated their free access to the health services:

¹⁶³ WFP Turkey (2017) ESSN Market Bulletin 2017 Q1; WFP Turkey (2017) ESSN Market Bulletin 2017 Q2; WFP Turkey (2017) ESSN Market Bulletin 2017 Q3: showing that the average cost of the MEB has increased by 1.74 percent in the last three months, increasing the average MEB to TL 316 per person. The updated WFP VAM gap analysis thus showed a TL 166 gap in the ability to meet basic needs for an average refugee household.

¹⁶⁴ Stakeholder interview 35.

¹⁶⁵ Turkish Statistical Institute (Feb 2018) Rate of change in the consumer price index <http://www.turkstat.gov.tr/PreHaberBultenleri.do?id=27759>.

“There is a good thing here; you do not need to pay for drugs. That’s a good point” (non-applicant Syrian woman, Hatay). Others mentioned that special drugs, such as insulin, allergy medicines and antibiotics, had to be paid for and ESSN money helped them to cover these expenses: “When I have money from the Kızılaykart, I put a certain amount aside to buy medicine for my child, who has an allergy” (beneficiary Syrian man, Urfa).

Protection

157. The design of a protection referral system to identify and support the specialized protection needs of TPs faced delays due to capacity issues early in the programme.¹⁶⁶ SOPs were developed in Q2,¹⁶⁷ and the mechanism was implemented in Q3. Service Centre staff, call centre operators and WFP or TRC field teams can i) provide information to address requests or issues that do not require any specific protection intervention; ii) refer queries to other service providers for non-ESSN related needs (such as health needs, educational needs, registration issues or other protection-related concerns); and iii) identify and escalate those with specific protection needs/risks to specialized staff in TRC service centres with relevant protection expertise.¹⁶⁸ As of September 2017, 1,535 cases had been referred to other service providers and over 8,550 cases provided with information. Most referral cases (30 percent) were health related, followed by DGMM registration cases (15 percent), and child protection cases (14 percent). 90 percent of referred persons were Syrian.¹⁶⁹

158. Training was given to SASF staff on identifying and referring protection cases within the government system,¹⁷⁰ but SASF staff reported in KII interviews that the brief interaction with refugees during the submission of an ESSN application was far from an ideal opportunity for non-specialist and already busy staff, to identify and refer protection concerns. In contrast, IPs, who are eligible to register with the Association for Solidarity with Asylum Seekers and Migrants (ASAM) rather than DGMM, received a full protection assessment at the time of registration.

159. The ESSN also reportedly reduced stress levels among the beneficiaries, and the ESSN programme responded to an element of psychological needs, bringing in some predictability to the lives of refugees. Even though refugees remained highly vulnerable, the cash transfer contributed to reducing their need to resort to negative coping strategies:

“Without the Red Crescent card support, it is impossible to survive. We have had the cards for six months now and we have started to calm down a little bit for the first time since we came to Turkey. It is not a sufficient amount of money but thank God! All of my children are attending school now” (beneficiary Syrian woman, Hatay).

2.2.5 What Other Effects Has the ESSN Had?

Household-level Effects

160. One of the effects of the ESSN most commonly cited at household level related to impacts on housing costs. Several stakeholders reported that, once it became clear that a household was in receipt of the ESSN benefit, some landlords increased the rent.¹⁷¹ If the refugees moved, the ESSN benefit would be suspended while the new address was reregistered with Nufus. Consequently, refugees were pressured to accept arbitrary and unfair increases.

¹⁶⁶ BCG (2017) DG ECHO Presentation.

¹⁶⁷ WFP Turkey (2017) ESSN SOP Protection and Referrals draft.

¹⁶⁸ WFP Turkey (2017) ESSN SOP Protection and Referrals draft; WFP Turkey (2017) Presentation DG ECHO Mission Coord AAP Protection (2017).

¹⁶⁹ WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017.

¹⁷⁰ In the Turkish system, protection is a responsibility of the Ministry of Family and Social Policy Provincial Directorate.

¹⁷¹ Stakeholder interview 7.

161. This issue came up in the FGDs as a concern among beneficiaries. A non-applicant raised the issue in Hatay:

“When my parents rented the house, the landlord asked whether they were beneficiaries of the Red Crescent card. My father asked whether it made any difference. He said the rent was TL 550 without the card, TL 750 with the card” (non-applicant Syrian woman, Hatay).

Another beneficiary stated: “My cousins changed their address; once, they were beneficiaries, then their card was put on hold for a while” (beneficiary non-Syrian woman, Afyon).

162. In some cases, waivers for educational costs were withdrawn from ESSN beneficiaries:

“The principal told my daughter, ‘You have an allowance’; he took TL 100 from her for books. He did not ask us. My daughter said, ‘Mum, the teacher told me that I have the allowance from the card, so I can pay TL 100 for books’” (beneficiary non-Syrian woman, Afyon).

Similar stories were shared in every province:

“I went to register my kids at school, and the school manager accused me of registering my kids at school to get an allowance from the government. I would like to defend myself, but I cannot speak Turkish” (beneficiary Syrian woman, Izmir).

163. The ESSN appears to have had little impact – intentionally or otherwise – on intra-household relationships. Based on FGD participants’ responses, out of the 55 beneficiaries who answered the question on who made the decision on spending ESSN money, 27 said the women decided, 16 said both women and men together made the decision, and 12 said the man decided. Male participants in particular justified their reply by saying, “I have no idea about household needs” (beneficiary Syrian man, Hatay), or “She decides how to spend the money. If she says she needs something, it means it is necessary to buy it” (beneficiary Syrian man, Hatay). In PDM data, fewer than 1 percent of respondents reported tension in the household due to the ESSN. See Section 4.5 in Annex 13.

164. One potentially interesting effect (which is statistically significant) is a shift in beneficiary households reliant on unskilled labour and an increase in reliance on skilled labour. The PDM found that the share of beneficiary households identifying skilled labour as the primary income source increased from 23 percent to 26 percent, while the unskilled labour as a primary income source fell from 64 to 45 percent. This deserves further investigation. The change is associated with the ESSN becoming the main source of income for 23 percent of households, and the effect on overall labour supply is unclear. See Table 38 in Annex 13.

Community-level Effects

165. As noted in para. 108, the ESSN has the potential to influence social cohesion between refugees and host communities, both positively and negatively. The first round of the social cohesion survey results and early programme monitoring activities¹⁷² have generated some evidence of host community tensions and negative reactions to the ESSN in some locations, although overall host communities remain very welcoming.¹⁷³ Two factors appear to underlie this:¹⁷⁴

¹⁷² The social cohesion monitoring did not look at social tensions within the refugee community, nor between recipients and non-recipients.

¹⁷³ Socialprotection.org (2018) International Conference on Social Protection in contexts of Fragility & Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons, Brussels, <https://www.youtube.com/watch?v=US5l4NsShog>; WFP Turkey (2017) Social Cohesion Survey 1st round Report.

¹⁷⁴ Stakeholder interviews 11, 19, 20, 26, 43 and 46, and provincial KII interviews.

- i. There is a misunderstanding that the ESSN benefits are paid for by the Turkish Government. This misconception appeared to remain widespread with limited visibility given to the European Union funding.
- ii. An increase in competition for services (including at Halkbank, DGMM and Nufus offices). This was mitigated in some cases by opening separate offices or extending service times for services to be provided to refugees. One Halkbank manager described this as follows: “All the ESSN transactions are made in the last days of the month. On those days our branch is full of people, and we become swamped. Our regular customers are kept waiting too long, and this damages our customer relations.”

166. About half of the participants who attended FGDs commented that they had established good, but limited, relations with their Turkish neighbours (out of 144 respondents, 72 said they had positive but limited relations). The language barrier was mentioned as a significant barrier to social integration in Turkey, and many of them said they had limited relations, like “saluting each other” on the way past or sometimes “paying visits to their houses”. The Turkish community’s contribution and donations in the form of in-kind aid (such as second-hand clothes, second-hand furniture and food packages during Ramadan) are often mentioned by the participants with much appreciation and sometimes praise about the “bond between two Muslim societies”. However, the ESSN *per se* appears to have had little impact on these relationships.

167. KII respondents also tended to associate the ESSN’s impact more with improved financial security than with a significant effect on the refugees’ everyday interactions with Turkish society. Some of the provincial KII respondents (4 out of 50) associated the ESSN with a reduction in crime rates. A TRC service centre manager in Istanbul summarized this as follows: “What would a person do if he or she had no money? Would they live in the streets? What do you expect them to do when they have no money to buy food? They would become involved in crime.” This in turn was seen to ease social tensions.

National-level Effects

168. At the national level, one of the unanticipated benefits to the government was an increased rates of refugee registration. This helped the government to plan and manage the refugee caseload. It is clear that the introduction of the ESSN was associated with a big rise in Central Civil Registration System (MERNIS) registrations.¹⁷⁵ The Ministry of Interior reported that the total number of Nufus registrations increased from 600,000 immediately prior to the introduction of the ESSN, to 1.2 million by May 2017. Evidence on the impact of the ESSN programme on DGMM registrations was mixed – and a comparable surge in DGMM registrations was not recorded although offices reported large numbers of new applicants at the start of the programme.¹⁷⁶ As one stakeholder stated, there was no disincentive to registering with DGMM, and even in the absence of the ESSN this is required to access free health services.

2.2.6 How Effective Are the Management and Governance Arrangements?

Application Services

169. The Turkish Government institutions took the lead in managing the application process, with support from the TRC. The majority of ESSN applications (60.7 percent) were taken by SASF offices in Turkey from the start of the project until December 2017. The SASF brought an extensive capacity and expertise in receiving and evaluating aid applications. With over 1,000 SASF offices, the Turkish Government contributed a massive number of staff on the ground and national coverage, without which it would have been impossible to

¹⁷⁵ In Gaziantep, Nufus reported as many as 20,000 applicants in one day at the start of the ESSN (interviews 16 and 19).

¹⁷⁶ Stakeholder interviews 15 and 16.

reach so many beneficiaries.¹⁷⁷ As an SASF director in Izmir put it: “We were already used to providing these kinds of services. Moreover, you can find an SASF office in every single district of Turkey. This means that anyone can access the SASF, regardless of the province that they live in.” The SASF database was also important in assuring against possible fraud in the application system.

170. According to KII interviews, no standard training was provided by the Ministry of Family and Social Policy before the ESSN programme started. The SASF General Directorate held an online training for a selected group of SASF directorates. The information was communicated via online bulletins. An SASF director in Hatay reported:

“We first received an official notification from the General Directorate of the SASF through our online portal. Last year [2016], in November, we received an official letter stating that we needed to start getting and processing the applications.”

Consequently, some divergences were reported in the processes followed at SASF level. Specifically, the application and screening of applicants was reportedly inconsistent at some smaller SASF offices, particularly those with small numbers of applicants.

171. The TRC played an important role in providing surge support to national authorities for the application process, including the secondment of translators to government offices. Evidence from the FGDs shows that the application process was fastest when the refugees applied through a TRC centre, rather than through the SASF (see Figures 5–7 in Annex 5). One refugee reported on her visit to a TRC SC:

“Everything went so smoothly. I took a number and waited in line for 30 minutes. Then I submitted my documents while having an interview. They told me to go back home and wait for the message. That was it! They treated us well” (beneficiary non-Syrian woman, Istanbul).

172. A detailed capacity assessment of TRC was undertaken by a specialist provider (BCG) at the onset of the programme, which assessed the strength of programme governance, progress of and capacity to implement critical business processes and identified areas of programme management practices, organizational structures, and staff capacities that needed to be improved and systems and tools required, along with priority actions to address these issues.¹⁷⁸ This concluded that many of the delays identified in programme implementation in Q1 were due to capacity gaps.

173. This assessment was subsequently revisited in the second quarter. Demonstrable improvements had been made in most areas of concern by this point; where there were still some improvements required. Further capacity-building actions and modifications to operational plans and management practices were proposed.¹⁷⁹ These assessments had demonstrable impact on improving governance and management capacities for smooth running of the programme and achievement of outputs.¹⁸⁰ Arguably, if such assessments had been undertaken earlier at the design stage, improvements could have been factored in from the outset.

174. There was some duplication of responsibilities between partners. WFP responded to delays in TRC scale-up by becoming more operational than intended in the design. This included WFP assisting in registration at SASF offices, with crowd control, and in establishing appointment systems, translation services and printing materials. This contributed to a consequent tension as roles became blurred, with WFP assuming responsibility for both implementation and an accountability function.¹⁸¹

¹⁷⁷ Stakeholder interviews 60 and 71.

¹⁷⁸ BCG (2017) DG ECHO Presentation.

¹⁷⁹ BCG (2017) DG ECHO Presentation.

¹⁸⁰ BCG (2017) DG ECHO Presentation.

¹⁸¹ Stakeholder interviews 1, 3, 5, 20, 45, 50 and 51.

Programme Accountability

175. WFP played a lead role in ensuring accountability. ESSN partners established an M&E plan and detailed SOPs to guide monitoring activities and WFP-trained partners in the processes.¹⁸²

176. While WFP faced some delays in establishing functioning M&E processes and systems,¹⁸³ effective mechanisms were in place by Q2, with this function strongly staffed at both country and area office levels, with TRC partnering in aspects of data collection and data analysis. WFP's vulnerability analysis and mapping (VAM) and M&E analysis unit provided feedback to the programme through the various coordination fora,¹⁸⁴ allowing for design of specific and appropriate actions in conjunction with other ESSN stakeholders and ensuring that programme partners could respond and modify the programme design or undertake other actions to address issues arising from monitoring data. This included action to address issues around lack of sensitization of communities and SASFs (see para. 141); errors and gaps in targeting (para. 129); the transfer value (para. 77) and barriers to application¹⁸⁵ and enrolment for vulnerable households (para. 114 and 117).¹⁸⁶ Stakeholders perceived this as an important added value and critical in providing reassurance to European politicians.¹⁸⁷

177. One challenge on accountability was the Turkish Government's restrictions to WFP accessing household data, based on data privacy legislation. This – particularly constraints in accessing monthly data on ineligible applicants – compromised WFP's ability to ensure full accountability.¹⁸⁸ TRC has served as an intermediary between the government and WFP on this but has only been authorized to share an anonymized sample of 3 percent of the applicant data.¹⁸⁹

Effectiveness of Coordination

178. As the ESSN is implemented by multiple partners, strong and regular internal communication between these actors was critical for effective and accountable programming. Coordination took place at multiple levels (both national and provincial), through fora with different mandates and membership.

- i. It took several months to establish the Governing Board. Regular board meetings were in place by Q2 but issues being identified through the complaints mechanism and monitoring activities were still not being rapidly resolved. These issues were identified in the capacity-building assessments and remedial actions prioritized.¹⁹⁰
- ii. To facilitate coordination between implementing partners, and capacity-building of national actors, TRC and WFP established a JMC located in a shared office.¹⁹¹ The JMC is regarded by both partners as a useful mechanism to improve communication, although it has not been enough to ensure coordination between implementing partners.

¹⁸² WFP Turkey (2017) TRC WFP presentation DG ECHO mission M&E; WFP Turkey (2017) ESSN M&E SOP.

¹⁸³ BCG (2017) DG ECHO Presentation – for example, in Q1 there were no programme management tools in place for tracking and reporting on output progress, the JMC and board were established but not operational and there were monitoring positions still to be filled. These were prioritized as actions for Q2.

¹⁸⁴ WFP Turkey (2017) CVME Report (Round 1).

¹⁸⁵ TRC operates its own M&E system to support its internal decision making, that also monitors barriers to applications.

¹⁸⁶ WFP Turkey (2017) TRC WFP presentation DG ECHO mission M&E; Socialprotection.org. (2018). International Conference on Social Protection in contexts of Fragility & Forced Displacement. Session 2B: Meeting Commitments in Receiving Countries: Extending Social Protection to Displaced Persons. Brussels. Retrieved from <https://www.youtube.com/watch?v=US5L4NsShog>; WFP Turkey (2017) CVME Report (Round 1); WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017; CaLP (2018) The State of the World's Cash Report.

¹⁸⁷ Stakeholder interviews 6, 11 and 60. It was also observed that the ESSN was heavily monitored by the donor, with 2 joint monitoring missions and 12 donor monitoring mission during 2017 (stakeholder interview 37).

¹⁸⁸ WFP Turkey (Apr 2017) ESSN presentation to governing board; stakeholder interviews 1, 4 and 32.

¹⁸⁹ Stakeholder interview 65.

¹⁹⁰ BCG (2017) DG ECHO Presentation.

¹⁹¹ CaLP (2018) *The State of the World's Cash Report*.

- iii. The ESSN Taskforce, co-chaired by WFP and TRC, was established to “raise issues identified by WFP/TRC and other agencies and address operational issues related to the roll-out and / or implementation of the ESSN. The Task Force will enable interagency analysis and identification of gaps and challenges and promote actions to address them through the collection and collation of information”.^{192, 193} The CCTE implemented by the Ministry of Family and Social Policy and UNICEF is a standing agenda item at Taskforce meetings, facilitating solutions to the shared problems.¹⁹⁴
- iv. Coordination at provincial level worked well, despite arrangements being very localized and non-standardized. When asked during the KIIs, programme stakeholders were positive and clear about the distribution of the roles and responsibilities. “Our roles are well-defined. We know what to expect from whom. Some of the partners pay us regular visits and check whether everything is all right. I am sure they do this for other offices as well.” A TRC service centre manager in Istanbul, for example, said: “Every partner’s role is well-defined. We all support each other, and work in coordination.”
- v. However, on the negative side, rather than being genuinely multilateral, the ESSN is predominantly a series of bilateral relationship, where the TRC primarily holds relationship with the government, while WFP primarily holds the relationship with DG ECHO.

Key findings: Question 2 – Effectiveness

- The ESSN had reached an impressive number of beneficiaries, with a dramatic increase in coverage compared to the preceding assistance.
- The main barriers to application were registering with either DGMM or Nufus. Challenges were promptly identified by programme monitoring and were progressively addressed.
- The ESSN targeting criteria facilitated timeliness, transparency and a predictable caseload, and was to some degree progressive.
- Accurately targeting the poorest proportion of a relatively homogenous group was challenging and many vulnerable households were not covered due to both resource constraints and targeting.
- Applicants were informed of entitlements promptly, ATM cards distributed efficiently, and cash transfers delivered reliably.
- Beneficiary communication mechanisms took time to become established, but ultimately have been well-used and valued by beneficiaries. No appeals mechanism was established within the ESSN.
- The ESSN transfer is effective in improving beneficiary welfare.
- The referral of protection cases, by the ESSN, to other service providers remains *ad hoc* and inconsistent.
- In some cases the ESSN appears to have indirectly led to increased housing and educational costs for beneficiaries. At the national level, by encouraging refugee registration, the ESSN helped the government to better plan and manage the overall refugee response.
- Delays in programme implementation in Q1 were caused by some capacity gaps. This led to WFP becoming more operational than intended in the design.
- WFP played a critical role in ensuring overall accountability. M&E systems provided critical feedback to partners and inform programme improvements.
- Effective coordination mechanisms were eventually established at national and provincial levels.

¹⁹² WFP Turkey (2016) ESSN Taskforce Terms of Reference.

¹⁹³ WFP Turkey (2017) IA Coordination Structures.

¹⁹⁴ Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

2.3 Efficiency

2.3.1 How Cost-efficient is the ESSN?

179. A breakdown of the ESSN costs is presented below, showing the main cost categories and budget against expenditure (Table 2). As part of the agreement between WFP and DG ECHO, it was contracted that a minimum of 85 percent of the total programme costs would reach the beneficiaries.¹⁹⁵ The actual expenditure recorded up until December 2017 showed a transfer ratio of 86 percent (α value) was achieved by WFP.

180. The ESSN budget does not capture the full administrative cost associated with delivering the ESSN and consequently over-estimates the real α value. In particular, the Turkish Government has made major contributions to the refugee crisis in general, and to the operation of the ESSN in particular. The main contribution to the ESSN came from the Ministry of Family and Social Policy, which managed the bulk of application process. The evaluation gathered data from different SASF offices to estimate the staff requirements for processing these applications (see Table 19 in Annex 13). This analysis estimates the associated costs as TL 2.2 million (US\$550,000) in total, or just under US\$2.50 per application. In addition, the SASFs are responsible for conducting household verification visits. Using a similar methodology, the evaluation estimated these costs at TL 12.3 million (US\$3.1 million) in total, or US\$15.50 per household.¹⁹⁶

Table 2: ESSN Budget and Expenditure (2016–17)

	Budget (€)	Actuals (€)	Variance	% of actuals
Cash and voucher transfers	305,642,500	271,253,899	89%	86.0%
Cash and voucher related costs (TRC costs)	16,557,500	14,419,084	87%	4.6%
Total cash and vouchers	322,200,000	285,672,983	89%	90.5%
Total capacity, development and augmentation	1,105,325	225,872	20%	0.1%
Total direct support costs	10,382,000	8,972,230	86%	2.8%
Subtotal	333,687,325	294,871,085	86%	
Indirect Support Costs (ISC) (7%)	23,358,113	20,640,976		
Grand total	357,045,438	315,512,061	88%	100.0%

Source: WFP Interim Statement of Financial Account, 1 September 2016 to 31 December 2017

181. Halkbank also provides a subsidy to the ESSN as it provides its services for free. In comparison Ptt, the main competitor in delivering humanitarian cash transfers in Turkey, tendered on the basis of a fee on the amount transferred (.25 percent), a fee for card issuance (TL 3), and a fee for card delivery (TL 3.5).¹⁹⁷ On this basis and the amount transferred in 2017, the notional charges foregone by Halkbank come to TL 4.3 million (US\$1,075,000). Based on the preceding assumptions and calculations, it can be estimated that the direct contributions of the Ministry of Family and Social Policy and Halkbank would have added US\$4.6 million to administrative costs, giving an adjusted actual α value of 84.9 percent.

¹⁹⁵ This report refers to the percentage transferred to beneficiaries as the α value, and the residual costs are collectively termed “administrative costs”.

¹⁹⁶ See Annex 11.

¹⁹⁷ Communication with WFP VAM team April 2018.

182. The Turkish Government provides other services and support that are essential to the ESSN operation. This includes the registration of refugees (at both DGMM and Nufus) and the IT systems that underpin the application process. However, these costs are not directly attributable to the ESSN. The Turkish Government was registering refugees in the absence of the ESSN and the IT systems were largely in place to support the national social protection system.¹⁹⁸ AFAD also covered the TL 250 cost of the disability certificates in 2017, although this cost was passed on to beneficiaries in late 2017.

183. The ESSN also imposed coordination costs on AFAD and the Ministry of Interior. Both institutions reported that at HQ level they had two staff members who were the focal points for the ESSN. However, the staff were not dedicated full-time to the ESSN and had other concurrent duties.

184. This level of cost efficiency appears to be a significant improvement on the preceding arrangements for delivering basic needs assistance. A large-scale study of the comparative cost efficiency of DG ECHO funded transfers was conducted in 2016.¹⁹⁹ Based on a sample of 47 projects, this found an average α value of 56 percent.²⁰⁰ The sampled projects had a small average caseload of 31,000 beneficiaries and the study concluded that the primary driver of cost efficiency was scale. This finding is consistent with a conclusion that delivering at scale through the ESSN has led to an improvement in cost efficiency.

185. The cost efficiency of the ESSN also compares relatively well to other national social protection systems. In a sample of 8 national social transfers, α values ranged from 50 percent to 95 percent.²⁰¹ While comparisons need to be made with care (given the differing objectives and that some of the systems included complementary support), the ESSN compares reasonably well in percentage terms. A 2008 study to provide approximate benchmarks, based on a sample of 55 schemes of different types, conclude that the share of administrative costs in total programme costs clusters in the range of 5 percent to 15 percent in well-executed cash and in-kind transfers.²⁰² The ESSN cost efficiency is also very similar to UNICEF CCTE, even though the CCTE was benefitting from the ESSN infrastructure.²⁰³

Table 3: Cost Efficiency Ratios for Selected Social Transfer Programmes

	Beneficiaries	Transfer efficiency
Nigeria, Child Development Grant	60,000	73%
Bangladesh Chars Livelihood Programme, 2011/12	17,485	63%
Ethiopia Productive Safety Net Programme, 2010/11	7,535,451	72%
Ghana Livelihoods Empowerment Against Poverty Programme, 2010	26,079	47%
Kenya Cash Transfers for Orphans and Vulnerable Children, 2008/09	15,000	75%
Kenya Hunger Safety Net Programme, 2011/12	68,611	83%
Mexico PROGRESA/Oportunidades, 2012	6,500,000	95%
Zambia Child Grant, 2011	32,643	56%

Source: White (2013)

¹⁹⁸ Some adaptation of the ISAIS system was required, but the Ministry of Family and Social Policy reported that the costs of this were covered by a pre-existing service contract.

¹⁹⁹ Maunder *et al.* (2016) *Evaluation of the Use of Different Transfer Modalities in DG ECHO Humanitarian Aid Actions 2011–14*, DG ECHO, Brussels. Data was not available to enable a direct comparison with earlier humanitarian cash transfers in Turkey.

²⁰⁰ Average α value per implementing partner were RCM 78%, UN 76%, NGO 50%.

²⁰¹ Philip White (2013) *Guidance on measuring and maximising value for money in social transfer programmes – second edition*, UK Department for International Development.

²⁰² M. Grosh, C. Del Ninno, E. Tesliuc and A. Ouerghi (2008) *For Protection and Promotion: The Design and Implementation of Effective Safety Nets*, The World Bank, Washington, DC.

²⁰³ Stakeholder interview 31.

186. The unconditional ESSN transfer was found to be much more efficient than conditional cash transfers provided to refugees in Turkey. Data from one of the largest donor funded public works programmes²⁰⁴ was delivering a transfer with an α value 20 percent – less than 4 times as efficient as the ESSN. It was notable that the objective of the public works programme was set purely in terms of the short-term consumption benefits of the transfer and there was no skills development or long-term employment prospects. The transfer had been made conditional as a donor policy requirement.

187. However, given the scale of the programme, stakeholders have been critical of the absolute amount of administrative costs associated with the ESSN. While costs per beneficiary may appear reasonable, the total administrative charges of nearly €9 million (see Table 2) for services, principally related to accountability, are significant.

188. There has been particular criticism of the main driver of administrative costs²⁰⁵ – the 7 percent ISC charged by WFP (see Table 2).²⁰⁶ WFP is eligible to receive €24.6 million on the first phase (7 percent of €348 million).²⁰⁷ Two main arguments were advanced for this charge by WFP; to cover the financial risk that WFP is exposed to, and to support corporate innovation in WFP HQ. As for the first, it was noted that the ESSN financial risk is contractually transferred to TRC. As for the second, the public good financing argument may be convincing to donors, but it did not convince Turkish Government stakeholders.

189. The cost efficiency in Year Two increased contractually to 87.5 percent, against an DG ECHO wide target of reaching 85 percent cost efficiency.²⁰⁸ Part of this saving was a 0.5 percent reduction in the ISC rate. While potential savings were anticipated in the post-establishment phase (e.g. falling application related costs), many other operating costs were budgeted to remain similar in percentage terms (while rising in absolute terms) in Year Two (e.g. monitoring, evaluation and accountability) and new costs were anticipated to emerge (e.g. costs relating to capacity-building, household verification visits and rolling out discretionary allowances).²⁰⁹

2.3.2 Were ESSN Objectives Achieved on Time?

190. The start of the ESSN can be traced back to discussions between DG ECHO and the Turkish Government in late 2015. DG ECHO first informally approached WFP in February 2016. Multi-stakeholder workshops took place between March and May 2016. This was followed by two successive joint WFP–UNHCR proposals in response to the 2016 HIP, which added delays to the agreement, with the agreement was finally signed in August 2017.

191. The original planned ESSN timeline, as outlined in the HIP, was to start payments in September 2016, reach 500,000 refugees by December 2016 and 1 million refugees by April 2017.²¹⁰ Delays to the start-up of the programme meant that no payments were made until December 2016. The enrolment targets were subsequently revised, with the full target enrolment expected to be reached by June 2017.²¹¹ By April 2017, the programme was only reaching half the anticipated target (500,000 beneficiaries);²¹² by June, this figure had reached 680,000.²¹³ In April 2017, the project timeline was again revised as a result, with

²⁰⁴ Stakeholder interview 63. Data was shared on a non-attributable basis.

²⁰⁵ Stakeholder interviews 33, 37, 38, 39, 53 and 65.

²⁰⁶ The ISC is a global rate set by the Executive Board and cannot be negotiated at the project level. This was subsequently reduced to 6.5 percent in 2018. In addition, TRC itself receives an additional 1 percent overhead on the transfer budget and their actual costs.

²⁰⁷ And a further €42.25 million ISC (6.5 percent of €650 million) on the new agreement, totalling over €66.6 million.

²⁰⁸ Stakeholder interview 37.

²⁰⁹ Stakeholder interviews 44 and 48.

²¹⁰ DG ECHO (2016) HIP for Turkey.

²¹¹ BCG (2017) DG ECHO Presentation.

²¹² WFP Timeline (Apr 2017) WFP Turkey.

²¹³ WFP (2017) Country Brief.

the (increased) target of 1.3 million beneficiaries projected to be reached by November 2017.²¹⁴

192. Programme monitoring identified a number of reasons for these delays in reaching the targeted enrolment rates.²¹⁵ The ESSN was expected to take on a caseload already registered by the SASFs of up to 400,000 people for assistance prior to the ESSN. However, it was decided that, given concerns in the reliability of the data, these families would have to reapply, meaning the ESSN had to start from scratch. The lower than expected application rate in Q1 and Q2 was due to:

- i. A lack of awareness in the refugee population (see para. 119).
- ii. Barriers refugees faced in registration. This included backlogs of up to six months within DGMM for the updating of registration details of refugees or registering unregistered cases; difficulties in registering the physical address of those in temporary and informal accommodation; and distance to DGMM offices in some provinces.
- iii. Difficulties facing certain vulnerable groups in making applications. This includes people living with disabilities who could not access the required disability health reports;²¹⁶ illiterate households who could not correctly fill in the application or cover the costs of notaries; and those with mobility issues, or those living far from SASFs or service centres.
- iv. Limited capacity and efficiency of registration institutions (staff, translators, TRC service centres not opened, etc.). Hiring of staff was slow by TRC and WFP.²¹⁷
- v. As highlighted in para. 128 and following, the strict targeting criteria excluded a percentage of poor households who did apply, which also limited the enrolment rate for applications received.

193. Programme monitoring reports from Q1 onwards demonstrated capacity gaps within the SASFs. Challenges identified include overcrowding of SASF offices, limited staff numbers, lack of staff with the ability to speak the languages of Syrian refugees, a lack of interpreters, connectivity challenges with ISAIS (which is increasing due to the growing burden of ESSN applications on the system), and a lack of understanding about the ESSN programme processes and regulations among staff.²¹⁸

194. Several stakeholders noted a trade-off in the speed of delivery, against the time to plan and refine the ESSN model. The timeline for writing the proposal was reportedly tight and did not allow for additional preparatory studies.²¹⁹ Strong pressures were exerted on programme management to rapidly reach beneficiary targets in the early stages of the programme, before partner capacities were up to speed. A pilot was organized in November, but WFP switched to full implementation of the programme later the same month before the pilot results were received.²²⁰

195. It is difficult to make comparisons between the timeliness of the ESSN and other cash and voucher assistance. Much of a programme's efficiency depends on the design, and there is no consistent or standard design of these programmes.²²¹ It is particularly challenging in the context of the ESSN since this type of programming (models for delivering cash at scale, use of multi-purpose grants, and working with national social protection systems) are

²¹⁴ WFP Turkey (Apr 2017) ESSN Presentation to Governing Board.

²¹⁵ PPT progress: WFP Turkey (2017) Report Monitoring Debrief FMAs; WFP Turkey (2017) CVME Report (Round 1); WFP Turkey (Apr 2017) ESSN Presentation to Governing Board; WFP Turkey (2017) Report on Online Survey on Disability Health Report; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017; WFP Turkey (2017) ESSN Monitoring Q3 Report, Jul–Sep 2017; CaLP (2018) *The State of the World's Cash Report*.

²¹⁶ Difficulties are due to cost, transport, language, lack of information, and corruption (requests to pay bribes to obtain the report): see WFP Turkey (2017) *Report Monitoring Debrief FMAs*.

²¹⁷ By July 2017, WFP had recruited 70% of planned staff and TRC 50% (stakeholder interview 32).

²¹⁸ WFP Turkey (Apr 2017) ESSN presentation to governing board; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017; WFP Turkey (2017) *Report Monitoring Debrief FMAs*.

²¹⁹ Stakeholder interviews 35 and 71.

²²⁰ Stakeholder interview 1 and 71.

²²¹ Doocey and Tappis (2016) *Cash-Based Approaches in Humanitarian Emergencies: A Systematic Review*.

relatively new approaches, and designs have differed country to country. Experiences in neighbouring countries such as Jordan are not directly comparable, since the models for delivering cash at scale have differed quite substantially.

Key findings: Question 3 – Efficiency

- 86 percent of the total programme costs reached the beneficiaries. Additional uncosted contributions by the Ministry of Family and Social Policy and Halkbank are estimated to reduce the overall costs efficiency to 85 percent.
- The scale of the ESSN resulted in an improved cost efficiency compared to preceding delivery arrangements.
- The cost efficiency of the ESSN also compares reasonably to other national social protection systems and is much better than conditional cash transfers provided to refugees in Turkey.
- However, given the exceptional scale of the programme, the administrative costs still appear high, especially the 7 percent ISC charged by WFP.
- The scale-up of the ESSN was delayed by unforeseen challenges in the application process and hiring staff process that partners experienced.

2.4 Connectedness and Sustainability

2.4.1 How Well Connected is the ESSN with the Refugee Response in Turkey as a Whole?

Alignment with other Humanitarian Assistance

196. The ESSN can be considered well aligned with the broader humanitarian strategy and programmes, at least for the sectors of food and basic needs. The ESSN is the priority action outlined in the 3RP to address basic needs. Other basic needs programmes of other NGOs were largely assimilated into the ESSN. NGOs were an important source in referring needy refugees into the ESSN (see Box 6).²²² Other donors have realigned their basic needs assistance to complement the ESSN. For example, the United States Agency for International Development/FFP now concentrates its needs assistance to the in-camp populations not covered by the ESSN.²²³

Box 6: Referrals into the ESSN by NGOs

One beneficiary mentioned ASAM as follows: “I went to the ASAM organization. I told them that I was in need of money and I asked for their help. I told them that I have many dependents and couldn’t make a living. My children, especially, are suffering a lot. Then she guided me to the TRC” (beneficiary Syrian woman, Istanbul).

Another refugee mentioned the Danish Refugee Council (DRC) and added, “I had a Danish card before and it worked for a couple of months, then they stopped the card. I got a message from the DRC telling me that the DRC card was no longer available, but I needed to visit and register at the social security office to have a new card” (beneficiary Syrian woman, Urfa).

197. The evaluation found a broad consensus that the introduction of a single platform for the delivery of basic needs assistance had resulted in improved coverage and efficiency in addressing basic needs (see sections 2.2 and 2.3), as well as being the only viable option in receiving government approval.²²⁴ In the initial months, engagement with some other humanitarian actors was strained, since some agencies felt that the ESSN model had been imposed by DG ECHO and that it had effectively reduced operating space for them.²²⁵

²²² Stakeholder interviews 14, 25 and 46.

²²³ Stakeholder interviews 7 and 73.

²²⁴ Stakeholder interviews 5, 29, 39 and 46.

²²⁵ Stakeholder interviews 7, 29, 35, 43 and 46.

However, NGOs have subsequently refocused on providing complementary activities including protection and livelihood support.²²⁶

198. 3RP continued to address some additional needs through cash grants,²²⁷ and here partners made efforts to actively coordinate with and find synergies. The main complementary cash grants were provided in the form of winterization grants by UNHCR, UNICEF and the International Organization for Migration (IOM).²²⁸ There was a deliberate attempt to target this assistance to those refugees who were not ESSN beneficiaries, or only to provide reduced assistance to ESSN beneficiaries. Implementing agencies reported that their resources were insufficient to meet the needs of the caseload of refugees unable to apply for ESSN assistance²²⁹ and, while there is a facility to cross-check refugees receive ESSN transfers, this process was cumbersome.²³⁰

Connectedness with Other Government Services

199. There is evidence that the ESSN has helped facilitate access by refugees to a range of Turkish Government services, including by bringing refugees into contact with SASFs. Provincial level KIIs identified numerous cases where refugees had benefited from discretionary assistance from the SASFs²³¹ using their own resources.²³² Assistance was received from SASFs by both non-beneficiaries and beneficiaries according to need, including highly vulnerable applicants who did not meet the entry criteria for ESSN benefits. This practice was widespread enough to warrant the Ministry of Family and Social Policy issuing a circular in December 2017 prohibiting Ministries of Family and Social Policy from providing discretionary assistance out of their own resources to ESSN beneficiaries.²³³

200. The ESSN and CTE refugee programmes took advantage of a number of common administrative processes, harmonizing and streamlining assistance and realizing economies of scale. It also meant that the CTE-Refugees could scale up relatively rapidly.²³⁴ Post-transfer PDM data showed that, among applicant households with children, 22.2 percent are benefitting from the UNICEF education grant.

Protection Referrals

201. The government social services are in a process of expansion and development and the scale of the refugee crisis has clearly stretched the available capacity. Complementary protection programmes funded by DG ECHO and other donors and implemented by various humanitarian actors are supporting a range of refugee needs.²³⁵ This included refugee registration²³⁶ to support ESSN applications and provided “handholding” support to ESSN applicants,²³⁷ reducing barriers to enrolment for some of the most vulnerable. Refugee registration – which is encouraged by the ESSN incentive – also means that refugees are no longer illegal and can access legal protection.

²²⁶ Stakeholder interview 46.

²²⁷ UNCHR (2017) 3RP Turkey 2017–18.

²²⁸ Winterization support reached approximately 95,000 HOUSEHOLD under UNHCR and 6,000 HOUSEHOLD under IoM.

²²⁹ Stakeholder interviews 28 and 43.

²³⁰ Stakeholder interviews 25, 29 and 32.

²³¹ In addition to SASF assistance, many refugees in FGDs reported receiving a bag of coal once or twice in a winter from the municipal authorities.

²³² Stakeholder interviews 13, 24 and 68.

²³³ Provincial level KII interviews.

²³⁴ Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

²³⁵ Stakeholder interviews 46, 48, 64 and 72.

²³⁶ Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*; UNICEF Turkey (2017) *UNICEF Programme Document: Creating a Protective Environment for Vulnerable Refugee Children in Urban Areas, Providing E-Voucher Support for Vulnerable Refugee Families and Emergency Assistance to Children and Families on the Move*.

²³⁷ CaLP (2018) *The State of the World's Cash Report*; Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

202. A range of national and national NGOs provide one-off assistance in cases of exceptional needs, psychological support and educational training, although coverage was patchy.²³⁸ A gap in the provision of protection services for refugees was reported in areas without NGO networks.²³⁹

203. Referrals of protection cases from the ESSN to NGOs largely happened on an *ad hoc* basis. However, there was a degree of synergy in that TRC operates a large protection programme (which is distinct from the ESSN) and was able to internally refer ESSN applicants who applied through the TRC service centres. Where WFP identified protection cases in the course of monitoring, it referred these cases to a range of governmental and non-governmental providers. Refugees applying through the SASFs were not connected to UNHCR's protection work.²⁴⁰

Links to Livelihoods and Employment Programmes

204. Evidence of synergies with the work of other agencies on job creation, vocational and language training and refugee livelihoods was limited. The modest scale of these activities has provided few opportunities to explore possible synergies. While socio-economic support was one of the three sectors included in FRiT, the level of investments was very limited, with the bulk of the money going to education and health.²⁴¹ The largest United Nations programme plans to target 15,000 Syrian households for livelihood training and 50,000 for language training.²⁴²

205. The initial results of the livelihood support activities pointed to need for realistic expectations on the extent to which they might be scaled-up or their effectiveness in creating formal employment.²⁴³ In the interests of social cohesion, these programmes have been careful to include refugees alongside poor Turks.²⁴⁴ There was little appetite expressed by stakeholders for establishing large-scale public works programmes. Set against this is an acknowledgement that the longer the refugees are hosted in Turkey, the less likely they are to want to return to their countries of origin, and the more the need to consider durable solutions will grow.

206. Other agencies perceived that the ESSN could provide an understanding of refugee profiles that would help in planning and implementing livelihoods activities.²⁴⁵ There have been moves to use the Kızılaykart to transfer allowances provided by the United Nations Development Programme during vocational training. There was a reported disincentive to ESSN beneficiaries participating in short-term Iskur vocational training courses.²⁴⁶ Similarly, refugees in FGDs pointed out that a main constraint to participating in language training courses is that many of them are already informally employed and not in a position to forgo this income.

2.4.2 What are the Prospects for Linking the ESSN with National Systems?

207. The evaluation found very different assumptions among stakeholders on the future sustainability of the ESSN. On the donor side, there was an expectation that the ESSN would be integrated and sustained within national systems. This was seen as a core justification for implementing the ESSN in conjunction with the national systems, rather than as an

²³⁸ For example, IoM case-managed approximately 1,000 households in 2017.

²³⁹ Stakeholder interview 48.

²⁴⁰ Stakeholder interview 64.

²⁴¹ Stakeholder interviews 12 and 55.

²⁴² Stakeholder interview 27, 42 and 47.

²⁴³ Stakeholder interview 65.

²⁴⁴ Stakeholder interview 27 and 71.

²⁴⁵ Stakeholder interview 74.

²⁴⁶ Participants in the ISKUR course receive a small stipend on which they pay social security contributions. This registers on the SASF system and results in an automatic suspension of ESSN payments. As these take several months to resume, a strong disincentive is created to participating on these courses.

independent humanitarian programme. However, on the side of the national government, there was clearly no agreement on the future of the ESSN beyond the agreed programme period. While the Turkish Government remains supportive of the ESSN it was made clear that they see the financial responsibility remaining with the European Union.²⁴⁷

208. A first tranche of assistance has been agreed until 2019, but there is no agreement in place for 2019 onwards; nor is there political agreement on the overall envelope of European Union support to refugees in Turkey beyond 2019. Stakeholders were clear that continued assistance is required by refugees, and more specifically required to ensure the continuation of the ESSN.²⁴⁸

209. The challenges of the establishment phase required specific support to national systems, for example setting up the service centres to bolster the capacity of SASFs in areas with large refugee populations; modification of administrative processes for enrolment to reduce the administrative burden; and technical assistance to integrate the Ministry of Family and Social Policy's ISAIS and DGMM's refugee database.

210. The Ministry of Family and Social Policy supported the roll-out of the ESSN with regular circulars, training and intranet resources.²⁴⁹ However, with over 1,000 SASFs, the training needs were massive; specific issues required support and clarification, such as applying the dependency ratios and registering disability reports.²⁵⁰ WFP provided additional training and support for both SASF staff and TRC in how to support and manage the application and assessment processes.²⁵¹ This was largely in the form of on-the-job training, rather than formal training courses; spending on capacity strengthening was significantly under budget (see Table 2).

211. WFP and TRC have seconded programme staff selected by the Ministry of Family and Social Policy into the ministry to provide support there, as the start of a more formal process of working together.²⁵² Nufus is also now engaging in discussions on what capacity enhancing support the project can provide to improve the refugee registration process. Experiences from implementation and PDM are also generating evidence on points for improvement in national processes and capacities, which are being discussed with government partners during the regular programme management meetings:²⁵³ for example, the language barriers facing SASF staff, and the lack of an automatic referral process in the SASFs to address protection issues by national partners.

212. Little doubt was expressed that the Turkish Government has the capacity to independently manage the ongoing ESSN programme. However, WFP continues to retain the responsibility for meeting the donor accountability demands, including aspects of assessment and monitoring. There is little evidence of progress in transferring knowledge and skills to either the TRC or the Turkish Government, despite an expressed appetite for this training by TRC.²⁵⁴ It was also noted that the decentralized nature of the SASF poses challenges to developing and institutionalizing a standardised M&E system.²⁵⁵

213. Stakeholders identified a number of potential limitations to handing over the ESSN. First, the fact that the ESSN is a parallel system with different targeting criteria and transfer amounts means it cannot currently be integrated as part of the national system.²⁵⁶ The importance of equality between refugees and the host population was raised as a further

²⁴⁷ Stakeholder interview 37.

²⁴⁸ Stakeholder interviews 65 and 71.

²⁴⁹ Stakeholder interview 48.

²⁵⁰ Stakeholder interviews 48, 56 and 72.

²⁵¹ WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

²⁵² CaLP (2018) *The State of the World's Cash Report*.

²⁵³ *Ibid.*; WFP Turkey (2017) ESSN Monitoring Q2 Report, Mar–Jun 2017.

²⁵⁴ Stakeholder interviews 51, 52, 55, 61 and 71.

²⁵⁵ Stakeholder interview 25.

²⁵⁶ Stakeholder interview 43.

argument for alignment – and the possibility of donor support to enhance the social protection for poor Turks, alongside the ESSN.²⁵⁷ There were indications that the Turkish Government is evaluating the relevance of a household-level basic needs grant for poor Turks similar to the ESSN.²⁵⁸ However, it is clear that the timelines for the introduction of any new benefit and the phase-out of the ESSN are extremely unlikely to align.²⁵⁹ Nor has the ESSN been explicitly used to pilot such a system for the benefit of Turks.

214. In comparison, the CCTE is directly aligned to the national benefit, and dialogue is progressing with the Ministry of Education on the full integration of the CCTE refugee caseload and a public finance management study.²⁶⁰ The difference is that the CCTE essentially mirrors the national CCTE benefit.

215. A case study of MONE/MOFSP/TRC/UNICEF/Turkey's experiences of the CCTE and ESSN highlights that the decision of WFP to use a separate payment system to that used in the national social assistance system raises a question about the long-term national ownership and sustainability of these programmes. On the one hand, the Kızılaykart can provide an efficient and effective single platform for delivering a variety of humanitarian cash assistance for refugees. Such harmonization of payments is moving in the direction of the recommendations of the High-Level Panel on Cash Transfers and the current thinking of some donors such as DG ECHO for delivery of cash at scale. On the other hand, this is perhaps at odds with the ESSN objective of building and strengthening national systems and the aim of transitioning into the national social assistance system.²⁶¹

216. The large number of ESSN beneficiaries, when compared to the total caseload of the national social protection system, makes it hard to envision a smooth transition.²⁶² While some chronically vulnerable refugees will require continued assistance, a dramatic scale-down is required to make the ESSN palatable to Turkish Government. Many stakeholders argued for greater investment in employment schemes to parallel a scale-down of unconditional assistance by the ESSN, or a returns policy (although stakeholders were clear that the responsibility for this would fall mainly on programmes outside of the ESSN, which may nevertheless play a facilitating role through its knowledge of the refugee caseload).²⁶³

217. Underpinning the question of integrating the ESSN into the national system is the question of whether the ESSN continues to hold itself accountable to international humanitarian standards in terms of targeting, coverage and the level of assistance provided. Inevitably, any national system makes decisions on a political basis and will not be purely needs-based. Stakeholder opinion was divided on this, some arguing that the ESSN continued to benchmark itself against humanitarian standards; others felt that the programme had already sacrificed its humanitarian character.²⁶⁴

218. The financial responsibility was identified as a further important aspect of sustainability. Development funding, channelled directly to the Turkish Government, was seen as an important element of building national ownership. Part of this also relates to longer time horizons of developmental funding; it is hard to develop a coherent transition plan under single-year humanitarian grants.²⁶⁵

²⁵⁷ Stakeholder interviews 43 and 44.

²⁵⁸ Stakeholder interview 65.

²⁵⁹ Stakeholder interview 70.

²⁶⁰ Stakeholder interview 22.

²⁶¹ Smith (2017) *Approaches to Providing Cash-Based Assistance to Meet Needs of Children in Protracted Crises – Lessons from Turkey*.

It is also noted that the requirement to use the Kızılaykart was a requirement of the DG ECHO HIP

²⁶² Stakeholder interviews 39, 41, 52 and 64. The total number of poor Turks receiving social assistance was estimated at 2–3 million.

²⁶³ Stakeholder interviews 37, 44, 47, 50, 52, and 64.

²⁶⁴ Stakeholder interviews 37 and 41.

²⁶⁵ Stakeholder interviews 37, 50 and 61.

219. The ESSN logical framework included an activity (under the capacity-building result) of developing an exit strategy. However, the evaluation did not find evidence of WFP initiating a discussion on integration.²⁶⁶ DG ECHO and DG NEAR initiated a joint scoping study on the future of the ESSN in early 2018. This has not reported at the time of completing the evaluation. Multiple stakeholders argued that part of the solution moving forward would require transitioning refugees from unconditional assistance to improved employment opportunities. From the government perspective, availability of international funding is a key factor in ESSN continuation.

Key findings: Question 4 – Connectedness and Sustainability

- The ESSN was well aligned with the broader humanitarian strategy and programmes.
- NGOs have refocused on providing complementary protection and livelihood support activities, including supporting ESSN applications.
- Referrals out of the ESSN to protection programmes funded by DG ECHO and other donors, and implemented by various humanitarian actors, are *ad hoc* and limited.
- The ESSN was well connected with other Turkish government responses, including increased access to complementary discretionary assistance from SASFs resources.
- Synergies with job creation, vocational and language training and refugee livelihoods activities was limited due to the modest scale of these activities.
- Donor expectations that the ESSN would be integrated and sustained within national systems are not shared by the government.
- The TG has largely assumed responsibility for managing the ESSN, with the main exception of accountability, which is still provided by WFP.
- The distinct nature of the ESSN, coupled with its scale, are obstacles to integration into the national system.

²⁶⁶ WFP gave itself 1.5 points out of 3.0 for this in their exit strategy report. Refer to Annex 3 in this report. . WFP subsequently argued that they would only be in a position to lead on this if mandated to do so by the Governing Board.

3 Conclusions and Recommendations

220. Based on the findings presented in the previous section, an overall assessment that responds to the EQs is provided below. This is followed by a number of recommendations of how WFP can take-action to build on the lessons learned.

3.1 Overall Assessment and Conclusions

221. The ESSN provided relevant and appropriate assistance in a highly innovative format. ESSN support was clearly relevant to meeting some of the basic needs of refugees living out of camps. While information from needs assessments were limited, there was sufficient evidence to confirm both the needs and the appropriateness of using cash-based transfers to reduce the poverty and vulnerability of the refugees.

222. The ESSN was exceptionally well aligned with the government strategy and programmes for assisting refugees in Turkey. The ESSN was a highly innovative approach to the delivery of humanitarian aid, developed in close association with the Ministry of Family and Social Policy. The ESSN also incorporated relevant safeguards, which maintained its humanitarian credentials, despite being part of an integrated package of European Union political, developmental and humanitarian support. It is hard to identify a similar approach being used elsewhere and the design provides a source of learning and potential inspiration for other large-scale humanitarian responses.

223. At the same time, with the benefit of hindsight, some weaknesses can be identified in the design:

- i. The underlying analysis of refugee needs was limited, especially given the scale of the need, the innovativeness of the approach and the stage of maturity of the crisis. Beneficiary consultation on the needs, preferences and constraints of specific vulnerable groups (including women, the elderly and disabled) was limited. Consequently, the initial design offered relatively undifferentiated support to refugees.
- ii. The decision to provide application-based assistance left a significant number of vulnerable refugees outside of the footprint of the ESSN. No mechanism was established to provide bridging assistance to those who were unable to assemble the supporting documentation, those who faced a protracted wait for a decision on eligibility or those deemed ineligible but highly vulnerable.
- iii. Linked to the previous point, while the ESSN architecture was effective in forging linkages between many key stakeholders, it was not comprehensive. The context did not favour creating links between the Government led parts of the ESSN and other United Nations and NGO agencies, which provide complementary protection services.
- iv. There was no substantive assessment of Government capacities, development of a transition plan or sufficient analysis of the decision to piggyback (rather than integrate) the ESSN on Ministry of Family and Social Policy systems.
- v. There is an unresolved tension over whether the primary objective of the ESSN is providing needs-based humanitarian assistance, or institutionalizing assistance to refugees within the national system. This uncertainty affected both strategic and operational decisions.

224. Overall the ESSN systems worked well, especially considering the large numbers of refugees that were successfully reached. The overall effectiveness of the ESSN is a testament to the underlying effectiveness of the roles played by the programme partners. Each of the main actors contributed based on comparative advantages to deliver key services.

225. The application process was generally well administered by the Ministry of Family and Social Policy and TRC – albeit with some start-up delays due to capacity constraints. Similarly, the actual cash deliveries proceeded smoothly, agreed with TRC and managed by Halkbank. The ESSN has successfully delivered assistance to a large proportion of refugees.

226. Furthermore, the evidence shows that the ESSN transfers were effective in improving refugee welfare, providing access to shelter, food, utilities, education and other basic needs. Beneficiary satisfaction in terms of effectiveness was high, even of the initial transfer amounts.

227. The ESSN targeting criteria provided a good solution to contextual pressures, but at the same time had limited success in identifying a smaller, slightly poorer proportion of a largely homogenous and overall poor group of refugees. However, the evaluation concluded that, from a needs-based perspective, it would have been preferable to cover a larger proportion of the population with a smaller amount.

228. The gender analysis underpinning the ESSN design was weak, with limited expertise or resources dedicated to the exploration of gender related issues by the implementing partners at the start of the programme. Gender did not significantly influence programming decisions and it was treated superficially in the ESSN proposal, mainly through a commitment to disaggregate monitoring data. In practical terms a small – but unquantified – number of highly vulnerable women struggled to access ESSN benefits. While gender has recently been accorded greater prominence, the opportunity to influence key programme parameters at this point is limited.

229. WFP made critical contributions to the planning and establishment of the ESSN and played an essential role in ensuring accountability during implementation. Monitoring mechanisms performed strongly under WFP leadership which underpinned the ability of the programme to learn and adjust – with WFP channelling relevant findings to an inclusive and responsive Governing Board. The role of WFP in both ensuring accountability and evidence of results, was strongly appreciated by donors. However, there has been limited progress in enabling national organizations to progressively assume responsibility for accountability to donors. WFP has also played an important, albeit unanticipated, part in operational support to fill unanticipated capacity constraints.

230. There is credible evidence that the ESSN resulted in large cost savings compared to the previous mosaic of humanitarian basic needs assistance. At the same time, there is clearly room for further significant reductions in administrative costs and for overhead costs to be shared more fairly among partners. This is especially pertinent as the ESSN will expand significantly (along with the administrative costs) in Phase II. The overhead ISC rates are hard to justify given the large scale of the programme.

231. The time taken to negotiate, establish and bring the ESSN to scale has been significant. From the perspective of building a national social protection system embedded in government systems, the programme timeline is arguably good. Equally, from a humanitarian perspective, the timeline, including the time for front-end negotiations with the national authorities, – made the system rather slow and cumbersome.

232. The ESSN was strongly connected with the overall refugee response. The sheer scale of the programme placed it at the centre of response coordination. Basic needs assistance has been largely consolidated within the ESSN, and good links established with other forms of Turkish Government assistance. However, some coordination gaps became apparent during implementation. While the ESSN was not a protection programme, it missed an opportunity to systematically identify and refer potential protection cases to a full range of service providers. Synergies with programmes seeking to enhance employment prospects for refugees remained inevitably weak, given the limited scale and coverage of these programmes.

233. There has been no real progress at the level of a political dialogue on the future of the ESSN. The Turkish Government largely has the requisite skills and capacities to manage the refugee caseload, albeit with questions over providing the necessary level of accountability. The principal question is one of financing and how costs might be apportioned and shared. However, the process of integration is complicated by elements of the programme that do not align with Turkish Government social assistance policies.

3.2 Lessons Learned and Good Practices

234. The most effective solution for providing humanitarian assistance will always be context specific. While it is unlikely that the ESSN in its entirety will be an appropriate solution in another country or context, successful elements of the approach may be highlighted for further consideration and possible replication.

235. Consolidating cash transfers to meet basic needs into a **single platform and single approach** has significantly improved the overall efficiency and coverage of the response. These benefits have clearly outweighed any downside risks. While some humanitarian agencies have scaled down or ceased to operate in Turkey, others previously engaged in providing basic needs assistance have refocused on other activities based on their comparative advantages or on operations inside Syria.

236. **Partnership with government institutions** has been integral to achieving an effective and efficient scale-up in the implementation of the ESSN. However, this implementation model has carried costs in terms of the speed of establishment. This suggests that this model of partnership is better adapted to providing second phase response, rather than as an immediate emergency response.

237. Managing the **dual objectives** of delivering a humanitarian response and integration with, or strengthening of, national systems created a continual strategic and operational tension. In the case of the ESSN, there is ongoing tension between increasing coverage (to meet needs) or to reduce coverage (to enhance prospects of sustainability). The lesson is that future similar initiatives should clarify the primary objective from the outset, rather than attempting to address both simultaneously.

238. The evaluation found a need to establish an appropriate balance **between speed of scale-up and the quality of programming**. Partly as a consequence of this, there was incomplete profiling of refugees and an absence of capacity assessments. In addition, staffing and structures were not fully in place prior to roll-out. Critically, the potential of a proper pilot phase was not exploited, contributing to a less efficient and timely process. Overall, WFP established very **strong internal monitoring systems** to track the performance of the programme, which allowed clear and positive conclusions to be drawn on the results achieved at beneficiary level, as well as adjusting programme implementation.

3.3 Recommendations

239. Based on the findings and conclusions of this evaluation, the recommendations of the evaluation team are outlined below. These are grouped into strategic and operational clusters and presented in order of priority within these clusters. The target group for recommendation is clearly identified. The timescale for recommendations is specified as either for the current phase (i.e. over the next 12 months) or for the design and implementation of future phases.

Strategic Recommendations

240. Recommendation 1: **WFP Turkey should encourage all partners to take a strategic decision on the primary objective of the ESSN.** To inform strategic and operational decisions, an urgent decision is needed on whether the ESSN is primarily intended to meet humanitarian needs or whether the objective is to support integration within national systems. These goals are not entirely compatible, and prioritization is thus needed between objectives. This is outside of WFP's direct control, as it is a political, not technical, decision, but WFP should actively facilitate and promote this discussion. In the absence of agreement on how to move forward, there is a risk that the ESSN may come to an abrupt end, with severe reputational implications for implementing partners and negative consequences for beneficiaries. Timeline: advocate for the strategic priorities to be clarified prior to agreement on a future phase of the ESSN.

241. Recommendation 2: **WFP Turkey should develop scenarios for the future of the ESSN under the two possible scenarios in Recommendation 1.** Working in tandem on the programmatic options can inform and help progress the political discussion and ensure timely adaptations in future phases. Elements to consider at this transition strategy include if and how to seek further alignment with national systems; coverage rates and budget; options for partnership; and accountability for any continued donor financing. Given WFP's duty of care to beneficiaries, it should proactively encourage and support the development of a transition strategy, in parallel with the political dialogue on the future of the programme. Timeline: to be completed during the current ESSN Phase.

242. Recommendation 3: **WFP Turkey should support other agencies to develop complementary livelihood and employment programmes.** There is no credible argument for integrating livelihood and employment programmes into the ESSN itself and it is recommended that the ESSN should maintain its focus on delivering unconditional cash transfers. However, drawing on its knowledge of refugee profiles, WFP can contribute to the development of strategies by other actors with comparative advantages in livelihood and employment programmes. It is acknowledged that the subsequent uptake of this analysis would be outside the direct control of WFP and the overall feasibility, efficiency and effectiveness of these programmes in Turkey remains unproven. Timeline: to be completed during the current ESSN Phase.

243. Recommendation 4: **WFP Turkey and WFP Rome should improve cost efficiency and budget equity.** The absolute amount of overhead charged by WFP on the ESSN potentially undermines the continued involvement of the organization in implementation. Therefore, consideration should be given at both the CO and the Executive Board levels on alternative cost models to allow WFP to remain competitive in large budget programmes such as the ESSN. Additionally, in the interests of equitable and productive partnership, a more equitable sharing of overhead costs with cooperating partners should be considered for any future ESSN phases. Timeline: Decisions involving the Executive Board will need to be addressed over the longer-term, however possible solutions at the CO level should be explored prior to a proposal for a future phase.

Operational Recommendations

244. Recommendation 5: **WFP Turkey should continue to minimize application barriers for specific vulnerable groups.** While progress has been made in addressing application barriers, further attention is required for the most vulnerable groups, including the disabled, women, the elderly and new arrivals. This should include conducting and using the findings of special studies, including the ongoing gender assessment to adjust operational guidelines. Ultimately responsibility for adapting application procedures lies with the Government and WFP can only advocate for change. Given the right of Turkey to

determine the residential location of registered refugees, it is cautioned against advocating to include the large number of unregistered refugees in Istanbul and Izmir into the ESSN. Timeline: to be actioned during the current ESSN Phase.

245. Recommendation 6: **WFP Turkey should continue to engage with the Ministry of Family and Social Policy to strengthen referral mechanisms.** This recommendation recognizes that the ESSN in itself is not responsible for addressing the protection needs of the most vulnerable refugees. In the interests of establishing sustainable solutions, WFP should advocate with the Ministry of Family and Social Policy to include referral pathways for refugees from SASFs, to a broad range of providers, both inside and outside of government. This should include the referral of highly vulnerable households either not able to apply for, or deemed not eligible for, the ESSN benefits. Timeline: to be actioned during the current ESSN Phase.

246. Recommendation 7: **WFP Turkey should develop and implement a technical assistance strategy to handover accountability functions to Turkish institutions.** To facilitate the eventual full handover of responsibilities to Turkish institutions, WFP should develop a plan to build the capacities and skills of Turkish institutions, in meeting donor demands for accountability, including assessment, verification, monitoring, evaluation and learning processes. Timeline: to be actioned during the current ESSN Phase.

247. Recommendation 8: **WFP Turkey should ensure adequate needs and capacity assessments to support programme design.** The evaluation found that the ESSN design was based on an insufficient analysis and understanding of refugee needs. Therefore, in future phases of ESSN (and in other large-scale transfer projects) WFP should ensure that it adequately consults potential beneficiaries; ensures that the necessary capacity assessments or self-assessments are conducted, and adequately analyses protection and gender concerns, including exclusion risks. Timeline: conducted prior to any future phase of the ESSN.

List of Abbreviations

3RP	Third Regional Response Plan
AFAD	Disaster and Emergency Management Presidency
ASAM	Association for Solidarity with Asylum Seekers and Migrants
BCG	Boston Consulting Group
CBI–TWG	Cash-Based Interventions Technical Working Group
CCTE	Conditional Cash Transfer for Education
CVME	Comprehensive Vulnerability Monitoring Exercise
DGMM	Directorate General of Migration Management
DRC	Danish Refugee Council
DG ECHO	Directorate General for European Civil Protection and Humanitarian Aid Operations
EQ	Evaluation Question
ESSN	Emergency Social Safety Net
FAFA	Financial and Administrative Framework Agreement
FPA	Framework Partnership Agreement
FGD	Focus Group Discussion
FRiT	Facility for Refugees in Turkey
GAP	Gender Action Plan
HIP	Humanitarian Implementation Plan
HQ	Headquarters
INGO	International Non-Governmental Organization
IOM	International Organization for Migration
IP	International Protection
ISAIS	Integrated Social Assistance Information System
ISC	Indirect Support Costs
KII	Key Informant Interview
JCM	Joint Management Cell
M&E	Monitoring and Evaluation
MEB	Minimum Expenditure Basket
MPG	Multi-purpose Cash Grant
NGO	Non-Governmental Organization
OECD	Organization for Economic Cooperation and Development
PAB	Pre-Assistance Baseline

PDM	Post-Distribution Monitoring
PRRO	Protracted Relief and Recovery Operations
Ptt	Posta ve Telgraf Teşkilatı, Turkey's national post and telegraph directorate
Q1, Q2, Q3	Quarter 1, 2, 3
SASF	Social Assistance and Solidarity Foundation
SOP	Standard Operating Procedure
TL	Turkish Lira
ToC	Theory of Change
TP	Temporary Protection
TRC	Turkish Red Crescent
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
VAM	Vulnerability Analysis and Mapping
WFP	World Food Programme

Annexes (in Volume II)

- Annex 1** **Terms of Reference**
- Annex 2** **Evaluation Timeline**
- Annex 3** **ESSN Results Framework, Indicators and Activities**
- Annex 4** **ESSN Theory of Change**
- Annex 5** **ESSN Application and Assessment Process**
- Annex 6** **Refugee Crisis Timeline**
- Annex 7** **Geographic Distribution of Refugees by Province**
- Annex 8** **Qualitative Data Analysis of Focus Group Discussions**
- Annex 9** **Evaluation Matrix**
- Annex 10** **Stakeholders Consulted**
- Annex 11** **Province Level Key Informant Interview Analysis**
- Annex 12** **Methodology and Data Collection Approach**
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- Annex 16** **Evaluation Reference Group Members**

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