

Comments from the Turkish authorities
on the updated Needs Assessment for the Facility for Refugees in Turkey

Ministry of Foreign Affairs Comments

1. There are currently **14 temporary accommodation centers (TAC)** in our country. Therefore, relevant changes should have been made in page 4.
2. **“Refugee” and “individual under temporary protection (TP)” are two different status.** For Syrians in our country, the term “individuals under TP” should have been used since these individuals are subject to Temporary Protection Regulation, while refugee status is determined by the Geneva Convention.

Hence, using **two different legal terms to refer to Syrians** in our country in the report should have been avoided.

3. Turkey has a **geographic reservation to the Geneva Convention of 1951.** For this reason, most of the asylum seekers arriving our country are not granted refugee status, but are defined as **“international protection applicants”**, and some of them are granted refugee or secondary protection status.

Therefore, **these individuals could have not been referred to as if they are granted international protection status.**

(For example; in this sentence at page 28, “...*whereas International Protection (IP) is available to refugees from other countries....*”: instead of term “IP”, “IP application opportunity” should be used.

Or on page 34: “...*out of 364,173 asylum seekers mainly from Afghanistan, Iraq and Iran..*”:

Instead of “asylum-seekers”, “externally displaced persons” should have been used.

“*Turkey currently hosts more than 3,8 Million registered refugees and asylum seekers...*”:

Instead of term “refugees and asylum-seekers”, “externally displaced persons” could have been used.

On page 30, instead of “...*Yezidi refugees*”, using the term “*Yezidis*” would have been more appropriate.)

4. Regarding the **registration process** of irregular migrants, there is a **prioritization depending on vulnerability criteria.**

Within this framework, the sentence “*some PDMMs (e.g. Istanbul) registering only certain categories (e.g. family reunification, health emergencies, new-born babies etc)*” on page 30, does not reflect the reality. To state that this practice is not arbitrary, the phrase “due to the urgent need for prioritizing certain vulnerable cases” could have been added to the end of the sentence.

5. **“Gündem Çocuk” is an NGO which has been closed within the framework of the state of emergency.** Therefore, it should not be referred to on page 34.
6. All the **registered IP applicants** in our country are **directed/forwarded to satellite cities** where they are expected to reside in. In line with our national legislation, **access to services such as health and education is only provided in satellite cities in which IP applicants are registered.** However, there is **no such practice as direct refoulement/deportation of these individuals** in case they are detected by relevant authorities.

Therefore, the sentence “...under IP settled outside assigned satellite cities face risks of deportation...” on page 44, does not reflect reality.

7. Registration process of irregular migrants in our country are being held in a meticulous manner and in line with the provisions of relevant national regulations. In this framework, there can be **delays in registration process in depending on the intensity of mass influxes as well as personnel and administrative capacity of the City Migration Administrations.**

In some cities, **the registration of Syrians was stopped for a short period in 2016, because of the new regulations for renewal of TP identification documents.** Today, this problem is solved and registration of Syrians is continuing as usual.

In this framework, the word “suspended” should have been deleted in sentence *“Since 2016, registration has been made more complex, lengthy and, in certain provinces (particularly Hatay, Istanbul and Gaziantep, but also others like Konya), it is selective (only vulnerable cases) or totally suspended.”* on page 31.

Directorate General for Migration Management Comments

Document	Page	Existing Expressions	DGMM Comments
Updated Need Assessment	5	Despite systematic efforts made by the GoT to provide verbal and written notifications to refugees when registering for temporary protection (TP) and international protection (IP), there appears to be persisting upstream information gaps about registration, rights, services, obligations and resettlement options. The gap is more serious for isolated refugees (rural areas, internet illiteracy, women, elderly and disabled), which increases the likelihood that most vulnerable refugees fail to register or need more time to complete the process and access rights.	<p>Informing the applicant and status holders of TP and IP about their access to rights and services is carried out by many public institutions, especially DGMM.</p> <p>Vulnerable people who cannot apply to PDMMs him/herself, however if the PDMM is informed about the situation, mobile registration vehicle reaches the person in question and carries out the registration process.</p>
Updated Need Assessment	5	The registration process for both TP and IP, assessed in detail in the report, is still lengthy and complex despite the considerable efforts made by the GoT.	<p>There is no complex and lengthy registration process for both TP and IP. The expression should be explained in detailed way to include how the report reached to such conclusion. DGMM can provide detailed information about the registration process.</p> <p>As known DGMM uses GoçNet system for registration, and one foreigner registration procedures takes about 15 minutes. For example, In Ankara Registration Center, one officials can register approximately 60 foreigners a day.</p>
Updated Need Assessment	5-6	Although administrative requirements as regards transferring registration to other provinces are clear, mobility between provinces also happens for reasons which are not taken into account by existing regulations, particularly informal labor which is essential to the livelihoods of many refugees... Loss of registration status leads to restrictions of rights to entitlements	<p>As stated in report; administrative requirements as regards transferring registration to other provinces are clear. On the contrary to the report, In 2017 DGMM prepared internal regulation on transfer of foreigners' registration, and the reasons for mobility of foreigners taken to account such as education, health and labour.</p> <p>There is no loss or restriction of rights.</p>
Updated Need Assessment	6	At the same time, several other categories of refugees with protection risks fall outside the definition of vulnerabilities adopted by the GoT and are not systematically captured by DGMM at registration/verification, or by other governmental actors. These groups are: seasonally mobile workers in particular in the agricultural sector, Dom, Yezidis , LGBTI people, sex workers and vulnerable men (unaccompanied men,	The definition of the vulnerable person is stated in very comprehensive manner. The groups mentioned in report (Yezidis, Doms) also included in definition of vulnerable person. Due to its geographical location Turkey has been host to many different profiles of foreigners. Thus it is not always possible to draft a regulation on each group since it would not be feasible to implement.

		single men heading households, men survivors of SGBV, who may resort to negative coping strategies) Even if incomplete, information is now available about these groups, the risks they face and their needs which require particular mechanisms outside existing generic efforts.	
Updated Need Assessment	30	Reasons for not seeking to register are 1) complicated registration procedures,	Registration procedures is not complicated, This statement requires more detailed explanation. If there is not sufficient explanation, this statement should be remove from the text.
Updated Need Assessment	38	Yezidi refugees in Turkey face prejudices and discrimination in access to services, education, housing and jobs and prefer not to be separated from members of their community	Is there any evidence to support this statement?

Statistics

Page 4;

Today Turkey stands as the world's largest refugee hosting country, with a registered refugee population of over ~~3.83,9~~ million. This includes over 3.57-~~8~~million Syrian refugees who are recognized by the status of Temporary Protection (TP) and over ~~250-311~~ thousand refugees and asylum seekers from various countries, including Iraq, Afghanistan, Iran and Somalia, who are under the status of International Protection (IP). There are also an unknown number of refugees who remain unregistered due to different reasons.

Currently there are ~~19-14~~ Temporary Accommodation Centres (TACs) located in ~~10-8~~ provinces, mostly near the Syrian border. However, the vast majority of refugees in Turkey (over 94%) are self-settled and live outside of these camps. There are four provinces today that are each hosting between ~~400000-600000~~ ~~300,000-600,000~~ registered Syrian refugees (Istanbul, Şanlıurfa, Hatay and Gaziantep). There are also provinces where the total population of Syrian refugees is more nominal compared to those mentioned but compose more than 10% of the provincial population (Kilis, Mardin, Mersin and Osmaniye). The provinces hosting the highest percentages of asylum seekers registered under IP are Ankara, Çorum and Samsun.

Page 15;

Out of 3.5~~8~~ million Syrians under TP in Turkey, more than 1.6~~7~~-million are children and about 1 million are in the school age.

Page 16;

Roughly ~~62~~9% of the refugees in Turkey are under 25 years old. ~~3125~~% of them, about ~~700470~~,000 persons, are between 18-25 years old,

Page 19;

Today Turkey stands as the world's largest refugee hosting country, with a registered refugee population of over 3.98 million, of whom the vast majority are from Syria (3.587 million) and account for nearly 4.5% of the host population. Since the onset of the conflict in Syria in 2011 the Government of Turkey (GoT)

~~As of 22 June 2018, 3,576,337~~ ~~As of 18 October 2018, 3,587,930~~ Syrian refugees are registered excludes Syrians holding residence permits (73,88084.278)10, an unknown number of unregistered Syrians and non-Syrian refugees residing in Turkey (discussed below). The percentage of male Syrian refugees in Turkey (54%) is slightly higher than females (46%). The age composition is notable in that Syrian refugees are a relatively young population, with 447% of the population being under the age of 18 and only 2% above 65 (for full list of registered Syrian refugees by provinces, gender and age distribution see Annex 2).

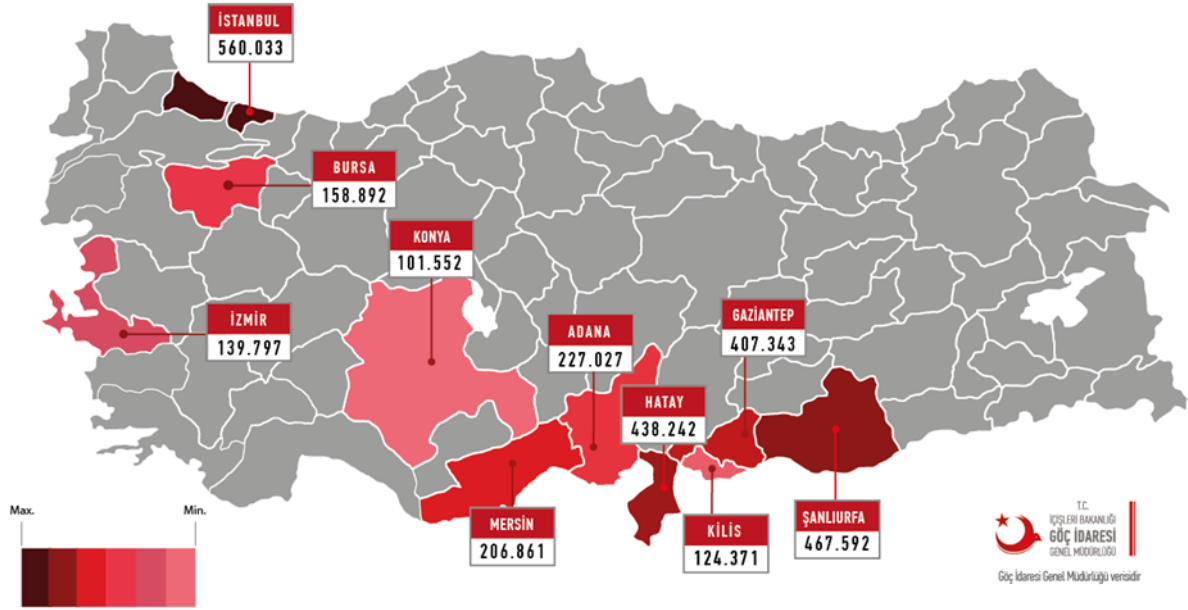
Currently in Turkey there are 149 Temporary Accommodation Centres (TACs) or camps (11 with containers and 83-with tents) located in 8-10 provinces, mostly near the Syrian border (~~See Annex 3~~). These camps accommodate a population of around 215,848171.640 Syrians and a small number of Iraqis (5,9783.968). In the TACs authorities are providing all essential services, protection services and activities and have public services such as playgrounds for children, sports facilities, grocery markets, barber shops, etc.

The vast majority of Syrian refugees (964%) are self-settled and live outside of the camps. Based on registration figures, out of the 81 provinces in Turkey, there are four provinces today that are each hosting between 4300,000-600,000 Syrian refugees: the highest percentage are living in Istanbul province (15.67%) followed by Şanlıurfa (13.3%), Hatay (12.24%) and Gaziantep (10.711.3%). When the figures are analysed in the context of the total rise in the population, there are six provinces where the numbers of Syrian refugees are more nominal compared to those mentioned but compose more than 10% of the provincial population. The province of Kilis still stands out with a 95.691.71% increase, followed by Hatay (28.227,8%), Sanliurfa (23.69%) and Gaziantep (19.120,2%). Apart from Istanbul, it is notable that these provinces are all located along or near the Syrian border (for the list of statistically most impacted provinces, see Annex 2).

Page 20; Revised figure 1 is below.

Figure 1: Provincial breakdown of Syrian refugees in Turkey

Geçici Koruma Kapsamında Bulunan Suriyelilerin İlk 10 İle Göre Dağılımı



Page 21;

The non-Syrian refugee population in Turkey has also been steadily growing over the past decade. As of 22 June 2018, there are 311.329.251.574 refugees and asylum seekers from various countries, the vast majority being from Iraq, Afghanistan, Iran and Somalia, who are under the status of international protection in Turkey.

According to DGMM data, male applicants under IP and status holders are around 535% across all nationalities, while female applicants and status holders represent 475%. Children (0-17) represent 44%. During the IP application process, applicants must register and reside in a city chosen by DGMM, which are referred to as satellite cities. The provinces hosting the highest percentages of registered asylum seekers aged (0-17) are Ankara (5452%), Çorum (5149%) and Kahramanmaraş (5556%) (See Annex 4).

Page 30;

Turkey currently hosts more than 3,89 Million registered refugees and asylum seekers, of which 3,57 Million are under TP status (Syrians with a smaller number of Palestinians, stateless persons and others who were refugees in Syria) and 251-311 thousand applicants under IP

-As of 27/722/06/2018, DGMM has verified some 645% of registered Syrians of which 247,676261.452 (some 15%) were identified as vulnerable.

Page 34;

Out of 3.587.9303,576,337 refugees under TP, 1,573,8971.696.814 are under 18, that is over half of the population (DGMM 22/06/18/10/2018). In addition, out of 364,173 asylum seekers mainly from Afghanistan, Iraq and Iran, some 116,535 are children.

Page 35;

45.8% of the refugee population from Syria is female and ~~44.83~~46.04 % of IP applicants are female.~~43~~

Page 36;

Men represent 54.2% of the refugee population from Syria (DGMM ~~22/06~~18/10/2018).

~~69,208~~66.742 registered refugees from Syria are 65 and over.~~61~~

Page 110; Table 28 will be revised according to following statistics

AGE MALE FEMALE TOTAL

0-4 290.146 270.788 560.934

5-9 246.812 231.578 478.390

10-18 352.380 304.480 656.860

TOTAL 0-18 889.338 806.846 1.696.184

DGMM 18/10/2018

Page 123;

Roughly ~~60~~62% of the refugees in Turkey are under 25 years old. ~~25~~31% of them, about ~~470,000~~700.564 persons, are between 18-25 years old, ~~i.e.~~.

Page 151; revised Annex 2 is below.

Syrians under Temporary Protection: Gender Distribution by Province

PROVINCE	MALE	FEMALE	TOTAL
ADANA	120.815	106.251	227.066
ADIYAMAN	14.825	13.516	28.341
AFYONKARAHİSAR	2.816	2.359	5.175
AĞRI	523	443	966
AKSARAY	1.377	1.277	2.654
AMASYA	301	296	597
ANKARA	46.189	39.964	86.153
ANTALYA	566	706	1.272
ARDAHAN	83	58	141
ARTVİN	23	20	43
AYDIN	3.906	3.316	7.222
BALIKESİR	2.389	1.717	4.106
BARTIN	94	25	119

BATMAN	10.830	11.040	21.870
BAYBURT	14	18	32
BİLECİK	307	250	557
BİNGÖL	469	399	868
BİTLİS	378	376	754
BOLU	1.119	813	1.932
BURDUR	4.773	4.027	8.800
BURSA	88.487	69.893	158.380
ÇANAKKALE	2.576	1.251	3.827
ÇANKIRI	298	217	515
ÇORUM	1.285	1.161	2.446
DENİZLİ	6.889	5.583	12.472
DİYARBAKIR	17.512	15.660	33.172
DÜZCE	995	534	1.529
EDİRNE	568	385	953
ELAZIĞ	6.801	5.471	12.272
ERZİNCAN	66	45	111
ERZURUM	597	452	1.049
ESKİŞEHİR	2.185	1.886	4.071
GAZİANTEP	212.158	194.025	406.183
GİRESUN	78	69	147
GÜMÜŞHANE	47	34	81
HAKKARİ	3.041	2.556	5.597
HATAY	242.504	195.831	438.335
İĞDIR	55	39	94
ISPARTA	4.073	3.194	7.267
İSTANBUL	316.671	243.714	560.385
İZMİR	77.276	62.408	139.684
KAHRAMANMARAŞ	41.940	39.029	80.969
KARABÜK	507	215	722
KARAMAN	335	361	696
KARS	80	70	150
KASTAMONU	749	476	1.225
KAYSERİ	42.853	33.766	76.619
KIRIKKALE	803	596	1.399
KIRKLARELİ	1.887	680	2.567
KIRŞEHİR	621	573	1.194
KİLİS	66.086	58.927	125.013
KOCAELİ	30.099	21.834	51.933
KONYA	54.680	46.655	101.335
KÜTAHYA	397	366	763
MALATYA	14.273	13.655	27.928
MANİSA	7.139	5.766	12.905

MARDİN	49.578	41.528	91.106
MERSİN	111.614	95.360	206.974
MUĞLA	8.801	4.893	13.694
MUŞ	691	655	1.346
NEVŞEHİR	4.899	4.389	9.288
NİĞDE	2.418	1.761	4.179
ORDU	363	303	666
OSMANİYE	25.623	22.539	48.162
RİZE	485	339	824
SAKARYA	9.087	5.817	14.904
SAMSUN	2.711	2.281	4.992
SİİRT	2.036	1.720	3.756
SİNOP	59	63	122
SİVAS	2.426	1.385	3.811
ŞANLIURFA	243.905	224.820	468.725
ŞIRNAK	8.443	6.743	15.186
TEKİRDAĞ	6.822	4.757	11.579
TOKAT	534	469	1.003
TRABZON	1.635	1.289	2.924
TUNCELİ	32	18	50
UŞAK	1.305	944	2.249
VAN	1.015	1.036	2.051
YALOVA	1.807	1.424	3.231
YOZGAT	2.090	1.879	3.969
ZONGULDAK	269	214	483
TOTAL	1.947.056	1.640.874	3.587.930

Syrians under Temporary Protection: Age Distribution by Province

PROVINCE	0-17	18-64	65+	TOTAL
ADANA	107.156	116.379	3.531	227.066
ADIYAMAN	14.177	13.638	526	28.341
AFYONKARAHİSAR	2.492	2.653	30	5.175
AĞRI	515	445	6	966
AKSARAY	1.359	1.273	22	2.654
AMASYA	298	299	0	597
ANKARA	43.234	42.040	879	86.153
ANTALYA	680	572	20	1.272
ARDAHAN	60	80	1	141
ARTVİN	24	19	0	43

AYDIN	3.499	3.678	45	7.222
BALIKESİR	1.733	2.341	32	4.106
BARTIN	14	105	0	119
BATMAN	9.387	11.976	507	21.870
BAYBURT	11	21	0	32
BİLECİK	234	320	3	557
BİNGÖL	475	384	9	868
BİTLİS	422	327	5	754
BOLU	837	1.078	17	1.932
BURDUR	3.802	4.906	92	8.800
BURSA	67.577	88.571	2.232	158.380
ÇANAKKALE	1.582	2.213	32	3.827
ÇANKIRI	221	293	1	515
ÇORUM	1.248	1.179	19	2.446
DENİZLİ	5.522	6.827	123	12.472
DİYARBAKIR	15.263	17.247	662	33.172
DÜZCE	522	992	15	1.529
EDİRNE	621	328	4	953
ELAZIĞ	5.714	6.412	146	12.272
ERZİNCAN	41	69	1	111
ERZURUM	503	540	6	1.049
ESKİŞEHİR	1.936	2.082	53	4.071
GAZİANTEP	197.352	199.930	8.901	406.183
GİRESUN	56	91	0	147
GÜMÜŞHANE	33	47	1	81
HAKKARİ	2.240	3.323	34	5.597
HATAY	178.541	247.915	11.879	438.335
İĞDIR	42	51	1	94
ISPARTA	2.810	4.387	70	7.267
İSTANBUL	230.025	322.387	7.973	560.385
İZMİR	61.424	76.734	1.526	139.684
KAHRAMANMARAŞ	43.961	35.761	1.247	80.969
KARABÜK	163	554	5	722
KARAMAN	354	336	6	696
KARS	65	85	0	150
KASTAMONU	521	699	5	1.225
KAYSERİ	35.197	40.494	928	76.619
KIRIKKALE	615	775	9	1.399
KIRKLARELİ	579	1.981	7	2.567
KIRŞEHİR	628	555	11	1.194
KİLİS	58.612	62.805	3.596	125.013
KOCAELİ	22.700	28.804	429	51.933
KONYA	52.126	48.159	1.050	101.335

KÜTAHYA	359	399	5	763
MALATYA	14.508	12.968	452	27.928
MANİSA	5.589	7.226	90	12.905
MARDİN	34.866	54.069	2.171	91.106
MERSİN	86.748	116.195	4.031	206.974
MUĞLA	4.423	9.138	133	13.694
MUŞ	752	579	15	1.346
NEVŞEHİR	4.551	4.668	69	9.288
NİĞDE	1.842	2.310	27	4.179
ORDU	321	338	7	666
OSMANİYE	22.919	24.129	1.114	48.162
RİZE	339	474	11	824
SAKARYA	5.867	8.917	120	14.904
SAMSUN	2.394	2.536	62	4.992
SİİRT	1.863	1.854	39	3.756
SİNOP	41	77	4	122
SİVAS	1.409	2.383	19	3.811
ŞANLIURFA	227.242	230.486	10.997	468.725
ŞIRNAK	4.144	10.623	419	15.186
TEKİRDAĞ	4.776	6.737	66	11.579
TOKAT	465	520	18	1.003
TRABZON	1.327	1.557	40	2.924
TUNCELİ	20	30	0	50
UŞAK	897	1.332	20	2.249
VAN	1.155	865	31	2.051
YALOVA	1.499	1.680	52	3.231
YOZGAT	2.081	1.856	32	3.969
ZONGULDAK	208	274	1	483
TOTAL	1.611.808	1.909.380	66.742	3.587.930

Ministry of Family, Labor and Social Services (MoFLSS) Comments

Page Number	Related Part	Views of Directorate General of International Labour Force
Table of Contents	“Refugees”	The term refugee is legally different in Turkish legal framework. Therefore, the term SuTP should be used instead all over the text.
List of Abbreviations	MoFLS: Ministry of Family and Social Policies	New name: Ministry of Family, Labor and Social Services (MoFLSS)
10	Reportedly, many refugees also have limited knowledge about the work permits system in Turkey.	This sentence should be completed mentioning that Directorate General of International Labour Force carries out information activities.
75	While the introduction of the Regulation on Work Permits was a major step forward, in practice work permits remain inaccessible for the vast majority of Syrians Under Temporary Protection in Turkey.	Syrians under temporary protection have access to labor market since the beginning of 2016. Work permits are evaluated and approved by the Ministry if the necessary criteria are fulfilled. To make the process easier, applications are submitted online via “e-devlet” with the new “e-izin” system
80	Relaxing quota of a maximum of 1 in 10 foreign employees for Syrians in any given workplace, in order to simplify employers’ capacity to hire Syrians in those sectors in which it is very difficult to recruit Turkish citizens, such as textiles and manufacturing. Simplification and reduction of restrictions on the regulations around work permits.	There are more than 3.6 million Syrians under temporary protection in Turkey and of which 2.1 million are at working age while Turkey’s unemployment rate is approximately % 11,1. A labor supply shock of that magnitude is not an easy task to handle.
81	Ensure that employers and employees are better informed about work permit application processes and provide more support.	Since the regulation of work permit has been enforced, employers and employees are being informed about work permit system and application process by DGILF in many cities especially cities which host Syrians densely.

Page Number	Related Part	Views of Directorate General of Family and Social Services
Sayfa-6	Current protection and social assistance schemes for children, women, elderly and disabled facing specific needs and run by (ex) MoFSP can theoretically be accessed by refugees but remain under-utilized...(ex) MoFSP still has limited capacities (staff, facilities, geographical coverage, particularly in rural areas, and funds, etc.) to incorporate all eligible refugees in its existing schemes	It is advised to use the word “legally” instead of “theoretically” in this statement. Besides, it is also advised to revise the statement as follows: “Despite that the MoFLSS...”
Sayfa-6	Existing public protection framework and assistance schemes are inadequate to meet their specific protection needs and likely to remain so in the medium and long-term.	Existing public protection framework and assistance schemes are inadequate to meet their specific protection needs and likely to remain so in the medium and long-term. Despite the Ministry supports the Social Service Centers, there is still a need for capacity building concerning with the facilities of the Ministry.”
Sayfa-29	MoFSP, the line ministry for social assistance and protection, did not share data with us regarding the number of current interventions serving refugees by different schemes, profile of beneficiaries, resolution rate, if issues appear in	By the regulations of legally framework MoFLSS, the line ministry for social assistance and protection, did not share data with us regarding the number of current interventions serving refugees by different schemes, profile of beneficiaries, resolution rate, if

	sequence, etc. or regarding the current capacity of the ministry's different sections and services to integrate refugee populations.	issues appear in sequence, etc. or regarding the current capacity of the ministry's different sections and services to integrate refugee populations.
Sayfa-41	The other type of assistance SSCs provide is disability home care allowance for the caretakers of the disabled. However, this is not available for refugees anymore.	There is only one legal obstacle on the refugees getting home care services and it is the absence of residence permit.
Sayfa-41	In addition, SSCs provide a range of other services: Counselling/PSS (not available for refugees due to lack of language skills and expertise in dealing with PTSD), precautionary measures	In addition, Psycho-social Support Services and counselling services are reachable for the refugees. Currently, via both Temporary Refuge Centers and the provincial directorates Psycho-social Support Services carrying out by the member of profession via interpreters.
Sayfa -43	MoFSP has started incorporating refugees in its various assistance schemes (particularly SED) and its outreach mechanism (ASDEP)	SED is not a kind of social aid but a social assistance as part of "protective and preventive services". ASDEP is not only a program aims to reach to the refugees but also all the parts of society.
Sayfa-45	Increase the number of mobile services and outreach in rural area and large urban centre.	MoFSP (Ex), is still making progress on the creating Mobile Social Assistance Centers for those who can not reach the services. It is important that to be known that our Ministry is taking care of this situation.

Page Number	Related Part	Views of Directorate General of Social Assistance
22	There is need to increase the number of CCTE beneficiaries, and to cover more upper-secondary education students as part of upper-education enrolment strategy. School transportation services play an important role in improving enrolment and attendance; these services for Syrian and other disadvantaged students are limited.	The CCTE requirements are the same as the national CCT programme. It is not possible to increase the existing populace without changing the admission requirements. It is not considered to change these conditions. On the other hand, with the Accelerated Learning Program (ALP) conducted by the Ministry of National Education, the schooling of the children who are out of school has been continuing. 60 TL Conditional Education Assistance is provided for these schoolchildren from the same fund.
56	Similarly, the <i>Conditional Cash Transfer for Education</i> (CCTE) programme for refugees and their children is an extension of the National CCTE programme that is implemented by UNICEF and Ministry of National Education (MoNE) since 2003 (see details on CCTE under Education chapter).	The Ministry of Family, Labor and Social Services has been the main implementer since the beginning of the project. The name of our Ministry has not been mentioned in this text.
57	Moreover, the government does not have a case management approach that the humanitarian actors adopt in programming. The coordination and referral between governmental and nongovernmental actors is also limited due to legal restrictions and capacity issues, it is not structured and often depends on locally developed interrelations at the provincial level	TRC's Outreach Teams are involved in case management in the context of ESSN. In addition, the Turkish Red Crescent is provided with the necessary guidance at the time of households visits of the SASFs or at the time of application. In this sense, the roles of partners in the project are evident.
57	First, persons facing protection risks and specific vulnerability groups might need special assistance to access basic needs schemes, while beneficiaries of such schemes with protection risks might need to be referred to protection actors. This referral system is relatively strengthened within the ESSN programme through recent monitoring activities.	Such special situation interventions can be made thru ESSN TopUp for Severe Disabilities and SASF Allowance which are implemented within the scope of ESSN.
61	The Livelihood chapter of this report will examine challenges and needs in this area in much greater detail,	While livelihood programs are important, the capacity of ISKUR and the employment rate in our country should be taken into consideration. It was not convinced that

	nevertheless, it is important to highlight here that scaling down humanitarian assistance while building up self-reliance depends widely on the effectiveness of current livelihood programming.	livelihood programs would significantly affect the ESSN populace.
68	Variations in the implementation of decisions and legislatives should be minimized by advocating enhanced coordination mechanisms, experience & problem sharing between different governmental bodies	The practices of the SYD Foundations under the ESSN programme are monitored by the Monitoring and Evaluation Teams established by TRC and WFP and the findings are shared with us. Our ministry intervenes in SASFs negative implementations.
68	Programming approach of the GoT is not participatory; refugees are not involved in programming design and service provision.	Program is not designed only by the Ministry; it is made by all partners in accordance with the feedback received from the field. In this sense, generalization towards the Turkish Government is erroneous.
68	Programming approach of sectorial actors does not always sufficiently involve local key informants and community leaders (in priority <i>muhtars</i> and <i>imams</i>) or administrations in program design and implementation.	The Board of Trustees is the ultimate decision-maker on whether or not to grant ESSN assistance, as well as the mukhtar, mufti, as well as charitable citizens and the representatives of NGO. In this sense necessary representation is available.
71	Continue various (small scale) cash based or in-kind assistance for NFL, winterization or other basic needs to 25,000 HHs (approx. 150,000 individuals)158 in priority for refugees who are ineligible for ESSN and for female-headed HHs. Timeframe: Short to Mid-	In this regard, the executive units need to be clearly identified. If the person who cannot benefit from the ESSN programme does not have an ID number of 99, the operations of SASFs are not eligible for accountability.
140	Continue and expand Cash Transfers in Education (CCTE). Target at least 500,000 beneficiary students per year.439 Action for Long-Term Model Development: Measure the impact of CCTE carefully and revise accordingly. Develop and discuss long-term strategic and fiscal scenarios for incorporating CCTE into existing Turkish model that is in place since 2003. Balance out multiple concerns on equity, budgetary pressures, and hostcommunity relations. Consider expanding MoNE Scholarship program to include Syrian and other migrant students meeting needs-based and achievement-based criteria. Timeframe: 3 years Estimated Cost: 225 million euros	It is considered that the budget have been determined prior to the recent exchange rate increase. The budget have been determined correct although it covers less beneficiaries. It is estimated that the number of beneficiaries for children aged 0-4 will be in the range of 600.000-750.000 within 3 years.

Page Number	Related Part	Views of İŞKUR
19, 85	Since 2016, Syrians are able to access employment support services provided by the government employment agency, İŞKUR. Despite this, relatively few have taken advantage of these services mainly because of the language barrier, as well as a lack of awareness about the services available and their entitlement to access them.	The statement “as well as a lack of awareness about the services available and their entitlement to access them” should be removed.
19, 82	Programs currently offered are often duplicative and poorly aligned with job opportunities and employer demands locally, in large part because of insufficient data about the labour force requirements of employers.	This statement should be removed from the text for there are labour market surveys conducted on the provincial level 4 times a year. TVET courses are implemented in line with the survey results.
22, 36, 116	<ul style="list-style-type: none"> Scale up mental health and psychosocial support services giving priority to preventive care, primary care and community-based services (with a focus on vulnerable populations, i.e. women, children, SGBV 	“minority groups” should be removed from the text, the people living in Turkey are not subject to discrimination due to their lineage, instead, all the citizens are deemed as “Turks”.

	<p>victims, minority groups, youth, including trainings to healthcare providers and support staff, strengthening referrals between governmental non-governmental structures, inter-sectorial referrals and referrals to specialized services, and provision of communication materials.)</p> <ul style="list-style-type: none"> • (Table) Situation of children, women, men, the elderly and disabled, LGBTI persons and sex workers, minorities, seasonal agricultural worker, freedom of movement as an intersectional issue • (Table – Priority Action 3) Strengthen coping strategies of refugee populations through community outreach and PH services to 800,000 adults with special care to vulnerable populations: women, children, SGBV victims, minority groups; 	
45 - 46	“Yezidis” & “Doms” articles	The parts regarding the Yezidi and Doms should be removed entirely from the text for naming and describing different minority groups leads to a discriminative language.
91	<ul style="list-style-type: none"> • Vocational training currently being offered are reportedly sometimes duplicative and poorly aligned with job opportunities locally, in large part as a result of insufficient data about the labour force requirements of employers. • TVET courses should be developed in consultation with local employers, businesses forums, and Chambers of Commerce/Industry/Labour, so as to develop skills that address their recruitment needs, which happens to some extent in some parts of the country but not nationwide • Little information available about TVET programmes provided and so unable to strengthen tools and curricula based upon empirical evidence of what has worked well. • Monitoring the performance and needs of students after they complete university/higher vocational projects and once they have worked for a period of time in the labour market to assess effectiveness of investments made. 	Under the “Language & Vocational Training” Table, the two rows below the first one should be deleted entirely due to the fact that there are labour market surveys conducted on the provincial level 4 times a year and TVET courses are implemented in line with the survey results.
92	The costs for the TVET trainings are calculated based on the vocational trainings of İŞKUR. An average training takes about 160 working days. For each training the instructor gets about 200 TRY per day and the participants receive 20 TRY to finance their daily needs. Assuming that each class consists of 25 people, the cost of a 160-day training program is 112,000 TRY. If the number of targeted workers is taken as 400,000 and the number of households is 300,000, so on average more than one member from a family will have TVET training, then there will be around 16,000 courses to be provided. As a result, the total cost will be 1,792 billion TRY, which is approximately 270 million Euros.	In the footnote 311, “an average training takes about 160 working days” is stated wrongly, it should be corrected to “an average training takes about 160 days”

Ministry of Health comments

Section	Related Statement in Report	MoH Clarifications and Elaborations
Page 12, “Current Situation – Access to Health”	The interpretation and implementation of health legislation vary by province; non-governmental health actors have difficulties to understand the context and adapt their programming.	The interpretation of health legislation does not vary by province. The health legislation is definite and well-known by the provincial health authorities. The reason for differences between implementations in some provinces is the facilitative initiatives taken by the provincial administrators in order to avoid potential victimization of the target group.
Page 107, refe. No.388	According to MoH figures a typical health polyclinic is estimated to cost around 1.3 million TRY, which is around 250.000 Euros.	A typical health polyclinic with 5-6 units is estimated to cost around 2.5 million TRY, which is around 410.000 Euros in current Exchange rate.
Additional remarks		Although the additional load on emergency healthcare services is well-defined in the report, the additional load on 112 Emergency Health System is not mentioned. The enhancement of 112 Emergency Health System in the provinces with high proportion of Syrian population, should also be included in the needs assessment report.

Ministry of National Education comments

Page 113

Syrian children and families have problems “Problems in finding a school that have enough physical capacity and registering”

page 115

It is indicated in the report that CCTE have a very important role in school attendance. It may also play crucial role in catch up ve back up training thanks to include Catsh up and Back up training in CCTE.

page 123 table 33

Staff training for Syrian Instructors is not provided by PICTES, the plus symbol (+) under PICTES in this topic should be ommited.

Page 128

Continue Works on improving Education Management Information Systems, robust data analysis strategies, data driven policy making process should be driven by MoNE according to rules.