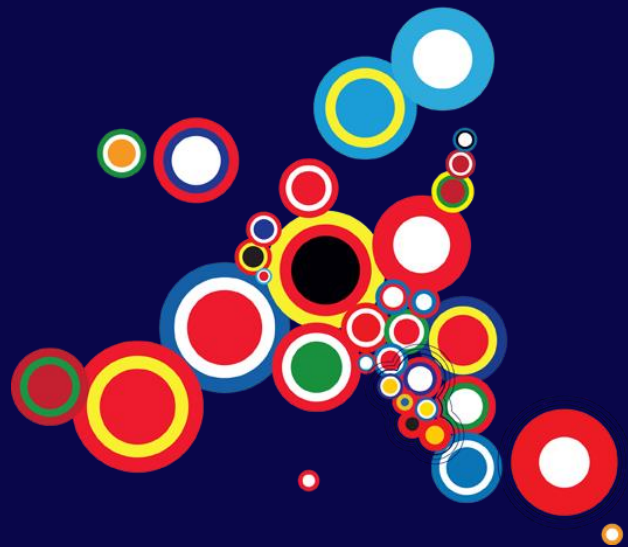




INSTRUMENT FOR PRE-ACCESSION ASSISTANCE (IPA II) 2014-2020

TURKEY Home Affairs Action Document 2018



Action summary

This Action builds on continues support in the Home Affairs sector provided to Turkey in previous programming years. The objective is to improve Turkey's legal and administrative framework in the field of Home Affairs in line with the EU acquis and EU standards.

Within this action it is aimed to strengthen Turkey's capacity to counter-human trafficking in line with the EU Acquis on Human Trafficking, the CoE Convention and other international standards.

Action Identification	
Action Programme Title	Annual Action Programme for Turkey (2018)
Action Title	EU Support to the Fight against Trafficking in Human Beings in Turkey
Action ID	IPA XXX/Turkey/Home Affairs
Sector Information	
IPA II Sector	Rule of Law and Fundamental Rights
DAC Sector	15110 - Public sector policy and administrative management
Budget	
Total cost	EUR 5 000 000.00
EU contribution	EUR 5 000 000.00
Budget line(s)	22.020301
Management and Implementation	
Management mode	Indirect management Direct management for the external evaluation of EUR 50,000
EU Delegation <i>Indirect management:</i> National authority or other entrusted entity	Central Finance and Contracts Unit
Implementation responsibilities	Directorate General of Migration Management
Location	
Zone benefiting from the action	Turkey
Specific implementation area(s)	Turkey
Timeline	
Final date for concluding Financing Agreement(s) with IPA II beneficiary	At the latest by 31 December 2019
Final date for concluding procurement and grant contracts	3 years following the date of conclusion of the Financing Agreement, with the exception of cases listed under Article 114(2) of the Financial Regulation
Final date for operational implementation	6 years following the conclusion of the Financing Agreement ¹
Final date for implementing the Financing Agreement (date by which this programme should be de-committed and closed)	12 years following the conclusion of the Financing Agreement

¹ Implementation period of this specific Action will be 4 years.

Policy objectives / Markers (DAC form)			
General policy objective	Not targeted	Significant objective	Main objective
Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	✓
Aid to environment	✓	<input type="checkbox"/>	<input type="checkbox"/>
Gender equality (including Women In Development)	<input type="checkbox"/>	✓	<input type="checkbox"/>
Trade Development	✓	<input type="checkbox"/>	<input type="checkbox"/>
Reproductive, Maternal, New born and child health	✓	<input type="checkbox"/>	<input type="checkbox"/>
RIO Convention markers	Not targeted	Significant objective	Main objective
Biological diversity	✓	<input type="checkbox"/>	<input type="checkbox"/>
Combat desertification	✓	<input type="checkbox"/>	<input type="checkbox"/>
Climate change mitigation	✓	<input type="checkbox"/>	<input type="checkbox"/>
Climate change adaptation	✓	<input type="checkbox"/>	<input type="checkbox"/>

1. RATIONALE

PROBLEM AND STAKEHOLDER ANALYSIS

Due to its comparatively favourable socio-economic situation and geo-political location and the armed conflict in the neighbouring countries, particularly in Syria, Turkey is positioned as a target and transit country in terms of both regular and irregular migrants. In 2017, more than 30 million foreigners have entered into and exited from Turkey, and 600.000 foreigners were supplied with residence permits. Furthermore around 170.000 irregular migrants were apprehended in Turkey which stands on a migration route due to its geographical situation. While providing temporary protection status to more than 3.5 million Syrian nationalities, Turkey has also received over 110.000 international protection applications. In line with those data, it can be easily assessed that Turkey is vulnerable for the crime of human trafficking. Turkey is a target country in terms of human trafficking crime and in the last years, Turkish authorities have identified victims of human trafficking (VoTs) from a diverse range of nationalities. Between 2014 and 2017 135 identified victims of human trafficking were Syrians, followed by Kyrgyz (98), Uzbeks (77), Moroccans (43) and other nationalities (289).

Out of 642 victims which were identified between 2014 and 2017, 155 were under 18, 443 were between the ages of 18-36 and 44 were above 36. 513 of total victims are women while 129 were men, moreover 460 of total victims experienced sexual abuse while 108 endured forced labour and 74 endured forced begging. When the provinces are examined we can see that between 2014 and 2017, 134 were identified in Antalya, 130 were identified in İstanbul followed by 57 in Ankara, 47 in İzmir and 274 in other provinces. Persons trafficked for the purposes of sexual exploitation, as worldwide, were mostly identified; meanwhile, attention to forced labour has increased. The numbers of migrants formally identified as Victims of Trafficking (VoTs) in Turkey in recent years are relatively low but increasing, and are primarily coming from Central Asia, as well as from Eastern Europe, Syria, Afghanistan and Morocco, and primarily for sexual exploitation. However, research conducted by IOM in coordination with DGMM has revealed a range of vulnerabilities faced by migrants in Turkey, including potentially a far larger incidence of trafficking and exploitative practices than that revealed by official figures. In 2017, victims of human trafficking for the purpose of forced labour were mostly Afghans and Moroccans. For the purpose of begging, Syrians were predominantly identified as victims of human trafficking (DGMM Annual Report on Combatting Human Trafficking, 2017).

The Syrian crisis, which had led to the mass migration of millions of vulnerable refugees to Turkey, is bringing new challenges in preventing human trafficking and protecting rights of trafficked persons. Turkey has become one of the countries with the highest number of asylum-seekers in the world. Moreover, Turkey also hosts a high number of migrants/asylum-seekers from Iraq, Afghanistan, Iran and Somalia. Therefore, this increasing number of persons with vulnerabilities migrating to Turkey, either looking for better opportunities, or searching for international protection creates an environment conducive to human trafficking. Recruitment tactics, such as fraudulent job offers, shelter, or education, seem extremely appealing in the absence of durable solutions. As the immigration infrastructures of host countries are buckling under the strain of processing the refugees, many individuals are forced to rely on other methods to gain entry into their desired countries of destination or to fight for better living conditions. As UNODC most recent global data of 2016 reveals that approximately 79% of the victims of trafficking were women and children and among international migrants who have moved from one country to another represent a high percentage. This also reflects the situation for Syrian refugees in Turkey. According to the data of the Refugee Association, a high number of refugee women and girls are facing sexual exploitation and violence.

In light of the importance given to counter trafficking in the last 15 years, Turkey approved and ratified different Conventions which enabled to improve prevention, protection, prosecution and cooperation in order to fight trafficking in human beings. Among these, in 2003, Turkey ratified the UN-sponsored 2000 Palermo Convention and its supplementary protocols on Trafficking in Human Beings and Smuggling of Migrants. Turkey signed the Council of Europe Convention on Action against Trafficking in Human Beings on 19 March 2009, ratified it on 2nd May 2016 and it entered into force on 1 September 2016.

At the national level, in order to align with international instruments, amendments were made to the Turkish Criminal Code. According to Article 80 trafficking in human beings (THB) means any person who procures, kidnaps, harbours or transports a person from one place to another or brings a person into the country or takes a person out of the country, by (1) the use of threat, pressure, force or violence, (2) employing deceit, (3) abusing his influence, or (4) obtaining a consent by exploiting control over another or the desperation of such other, for the purpose of forcing them into prostitution or to work, provide a service, harvest their organs or to subject them to slavery or any similar practice. This crime shall be sentenced to a penalty of imprisonment for a term of eight to twelve years and to a judicial fine of up to ten thousand days. The current definition of trafficking in human beings in the Turkish Criminal Code is, *inter alia*, in line with the EU Directive 2011/36 - on preventing and combating trafficking in human beings and protecting its victims, Article 2.

Turkey also adopted a Regulation on Combating Human Trafficking and the Protection of Victims on 17 March 2016 in order to ensure a coherent, comprehensive, efficient, and victims-centred counter-trafficking legal framework. The Regulation sets out victims' rights such as on protection, assistance, accommodation in shelters, whenever necessary, reflection period and residence permit, access to healthcare services, psychosocial support, social services, legal assistance, guidance on access to education and training services, vocational education and supporting the access to labour market, temporary financial support to meet the basic needs of the victims, interpretation services, voluntary and safe return, and access to services, among other rights. The Regulation is in line with EU Directive 2011/36 - on preventing and combating trafficking in human beings and protecting its victims, Articles 8 and 11 to 13. It also complies with EU Directive 2012/26 - establishing minimum standards on the rights, support and protection of victims of crime, Article 1 and Articles 3 to 9.

Moreover, other regulations have been placed in line with EU directives, such as the Regulation on the Implementation on Work Permits of Foreigners, issued on basis of Law on Work Permits of Foreigners, No. 4817, Articles 7 and 13, favouring access to the labour market for victims of human trafficking, which is in line with EU Directive 2004/81 - on the residence permit issued to third-country nationals who are victims of trafficking in human beings, Article 11; Law No. 6458 on Foreigners and International Protection, providing definition of trafficking in human beings and establishing VoTs' eligibility for residence permits and preventing them from being deported, which is in line with EU Directive 2011/36, Article 2 and EU Directive 2004/8.

Despite the steps taken by Turkey in combating trafficking in human beings in recent years, there is still need for improvement. The 2018 Country Report for Turkey of the European Commission underlined that Turkey is a destination and transit country, and to a lesser extent source country, for women, men and children subjected to trafficking in human beings for sexual and labour exploitation. The main shortcomings identified in the Report are a limited accommodation capacity for victims and weak inter-agency cooperation, which has a particularly negative impact on identifying victims. A comprehensive multidisciplinary, victim-focused approach to trafficking in human beings needs to be developed. Human trafficking is often overlooked in humanitarian crises and omitted from evaluations of humanitarian and emergency responses - a gap noted in the 2016 Trafficking in Persons report issued by the US Department of State. Given the magnitude of the Syrian crisis and the distinct vulnerabilities of refugees, systems of trafficking must be identified and disrupted in countries of asylum.

Turkey needs to assess implementation of the 2nd National Action Plan on Combating Trafficking of Human Beings (hereinafter referred to as the "National Action Plan") which was ratified by the Prime Minister in 2009 and prepare a 3rd National Action Plan, according to latest political and legislative developments, in order to enhance improvement on counter trafficking in Turkey and enhance harmonisation with the EU acquis. Accordingly, it was decided that the 3rd National Action Plan should adopt a more comprehensive and effective approach to combat human trafficking, including all relevant actors working in this field.

In addition to the National Action Plan, and also in line with EU Directive 2011/36 and Article 35 of the CoE Convention, a **countrywide strategy** to effectively coordinate with, and provide technical assistance to NGOs to combat human trafficking and protect victims of human trafficking in Turkey is essential. Turkey lacks a comprehensive strategy to involve civil society organisations, namely NGOs, in referral of Victims of

Trafficking (VoTs) to DGMM or to other governmental institutions, as well as in provision of assistance to VoTs. NGOs have a great potential in prevention, provision of assistance to VoTs and enhance or support in identification, therefore effective coordination is required. In the past three shelters for VoTs were operated by NGOs in Istanbul, Antalya and Ankara. Currently, there are only two NGOs working specifically on human trafficking issues in Turkey, which is insufficient given the countries' large population. There is a need for more civil society involvement, in particular in light of the size of the problem following the Syrian crisis and the increased figures related to VoTs of other nationalities.

Human trafficking is a transnational crime. Even in cases where there is no involvement of organised crime, in order to counter trafficking in human beings, greater involvement and cooperation amongst relevant stakeholders, such as the judiciary, law enforcement, local authorities, health sector, labour sector, migration authorities, civil society and international organisations, is needed.

There is a need to build upon efforts to increase the capacity of public stakeholders to develop, coordinate and implement effective trafficking prevention strategies and victim assistance. Due to the fact that human trafficking is a cross-cutting issue, the number of actors involved is rather high. Everyone in the society is liable to report any potential human trafficking incidents to relevant authorities. Stakeholders such as Turkish judiciary, law enforcement agencies, Ministry of Health, Ministry of Labour, Social Services and Family, NGOs and local authorities including municipalities, should be reached and sensitised to the seriousness of such crime and to the need of cooperation in order to prevent, protect victims and prosecute criminals.

Law enforcement agencies such as Turkish National Police, Turkish Gendarmerie General Command and Turkish Coast Guard are responsible for responding to these reports which may come from anyone or any institution and start an investigation. They have the responsibility to conduct a preliminary identification and refer the potential victims to the DGMM for screening. Throughout this process, a criminal complaint will be filed automatically which is under the responsibility of the Ministry of Justice (prosecutors and judges) which is followed separately. Authorities such as Ministry of Labour, Social Services and Family are responsible for referring potential trafficking cases throughout labour/social security inspections to DGMM as well as assist victims under the shelters run by the Ministry. As victims of trafficking have free access to emergency health services, Ministry of Health is the authority to provide this service. NGOs and International Organisations are key stakeholders to be involved at any stage of these processes to further assist the public authorities to conduct all tasks in a successful manner.

Awareness raising on combatting human trafficking, among the public in general - based on the three key elements that must be present for a situation of trafficking in persons: (i) action (e.g. recruitment); (ii) means (threat); and (iii) purpose (exploitation) - is an important element of counter trafficking policies. Enhance knowledge on human trafficking within the society (meaning counter trafficking stakeholders but also and foremost civil society) is key since ignorance or little information about human trafficking leads to several other problems that undermine prevention, prosecution, victims protection and assistance, such as low identification of victims, invisibility of such crime within societies or even acceptance of certain forms of exploitation.

As highlighted in the 2018 Country Report, there is a need for additional VoTs shelters. This need was reiterated at the 2016 Security Council Open Debate on Trafficking in Persons in Situations of Conflict whereby EU Member States were encouraged to build strong partnerships with civil society, including local women's rights organisations. Moreover, increased capacity in hosting of VoTs will enhance implementation of Turkey's National Referral Mechanism.

Victim support services have a significant place in the National Referral Mechanism of Turkey. Hosting and accommodating of victims in shelters constitutes the main pillar of the victim support programme. The victims in those shelters have access to accommodation or safe location, healthcare services, social services and assistance, legal assistance and counselling services, education, training services, and vocational services, labour market, financial support, interpretation services and psychological support. However there is an urgent need for qualified staff to perform and maintain the relevant support programme and also specialised shelters in the provinces where victims are highly populated and identified. Such services should be provided in an effective, constant, standardized and uniform way.

OUTLINE OF IPA II ASSISTANCE

Under the 2018 Home Affairs Action Programme, one single activity will be financed to address trafficking of human beings in a holistic manner. The draft Third National Action Plan will be prepared in line with the CoE Convention, NGOs coordination with public institutions will be increased, victims of trafficking in human beings access to assistance services will be enhanced, awareness raising activities, maintenance and refurbishment of one pilot shelter will be provided and safe accommodation, necessary living conditions and adequate services for VoTs will be supported through a Grant Agreement directly awarded to the International Organisation for Migration (IOM).

RELEVANCE WITH THE IPA II STRATEGY PAPER AND OTHER KEY REFERENCES

In the Indicative Strategy Paper for Turkey (2014-2020), under the chapters “Democracy and Governance” and “Rule of Law and Fundamental Rights”, the concept of human trafficking is thoroughly addressed.

- Home affairs is a key area for financial assistance, in particular developing a fully functioning integrated border management system, with appropriate migration management and asylum practices, given the migratory pressures experienced by Turkey and the EU. **The fight against organised crime, including against trafficking in human beings, and the improvement of law enforcement need to be further addressed**, in line with Chapter 24 (Justice, Freedom and Security). Pre-accession assistance will be available to support a broader dialogue and cooperation framework between EU and Turkey. This will allow the EU and Turkey to address the full range of justice and home affairs policy fields and put in place steps towards visa liberalisation, in line with the visa liberalisation roadmap that was launched in December 2013.
- Turkey has carried out important reforms in the field of migration and asylum, including the 2013 adoption of the Law on Foreigners and International Protection. This law and related secondary legislation created the General Directorate of Migration Management. The Directorate’s capacity to implement this law will be crucial for Turkey’s future migration management system. **In parallel, efforts to improve legal and administrative infrastructure need to continue to bring these in line with European standards and international best practices, and effectively tackle irregular migration and human trafficking across Turkish borders.** The Syrian crisis and subsequent influx of refugees pose additional challenges. Turkey’s 2005 Action Plan for Asylum and Migration needs to be reviewed and updated, as it is the main strategic reference document in this area. Turkey’s reception capacity to accommodate and integrate refugees and to remove irregular migrants need to be improved, both in terms of infrastructure and institutional competence.
- Facilitating Turkey’s compliance with the requirements set out in the EU-Turkey readmission agreement, activities on document security, migration management, public order and security in line with the requirements set out in the visa liberalisation roadmap; **institution building to improve the Turkish administration’s capacity to manage migration and asylum, including activities to address trafficking in human beings.**

Council of Europe Convention on Action against Trafficking in Human Beings (2005)

Turkey ratified the Convention in May 2016, expanding the scope of its counter-trafficking obligations. The Convention provides for a series of rights for victims of trafficking, in particular the right to be identified as a victim, to be protected and assisted, to be given a recovery and reflection period of at least 30 days, to be granted a renewable residence permit, and to receive compensation for the damages suffered. The Convention contains various provisions placing obligations on States to take appropriate measures, in partnership with civil society and in co-operation with other States.

Besides changes in law and other regulations, in line with the ratification, as already mentioned in the “problem and stakeholder analysis”, Turkey has ratified and started to implement the Regulation on Combating Human Trafficking and the Protection of Victims, which complies with the CoE Convention.

In addition, the Convention requires states to participate in the Group of Experts on Action against Trafficking in Human Beings (GRETA), a monitoring body which overlooks the implementation of the Convention. The first evaluation round with regard to Turkey was initiated in October 2017, with a questionnaire which was replied by the Government of Turkey and released by the end of July 2018.

Despite these developments, improvements and work related to trafficking in human beings need to continue.

National Action Plan for EU Accession Phase-II (June 2015-June 2019)

According to Chapter 24 (Justice, Freedom and Security), Turkey should adopt a multi-annual and multi-disciplinary strategy to fight organised crime, in line with the EU strategic concept on tackling organised crime. The strategy should be accompanied by an action plan with targets, clearly defined guaranteed results, responsible institutions, realistic deadlines and budget estimations, where major investments are required. The strategy should cover the various typologies of cross border crime such as trafficking in human beings, drugs and counterfeited goods. Therefore, a 3rd National Action Plan, among other “Results” proposed, is of very much importance for clear definition of actions, objectives, results, milestones and indicators in order to monitor progress and reach the ultimate goal of fighting organised crime, including transnational crimes such as trafficking in human beings.

Turkey’s progress on the visa liberalisation roadmap (2016)

The Roadmap recommends that Turkey ratifies relevant trafficking laws as well as putting in further mechanisms to protect VoTs, namely through:

- Ensure sufficient resources for migration management, including training programmes;
- Continue & complete the implementation of the National Strategy and Action Plan for the fight against organised crime;
- Sign & ratify the Council of Europe Convention on Action against Human Trafficking, adopt and implement legislation in line with it and with the relevant EU rules;
- Provide adequate infrastructure and resources ensuring decent reception and protection of victims of trafficking and supporting their social and professional reintegration.

Turkey has ratified the CoE Convention; a comprehensive legal framework has been adopted on trafficking in human beings² in line with CoE and relevant EU rules, meaning the EU Regulation on Combating Human Trafficking and the Protection of Victims.

Turkey 2018 Report of the European Commission

Turkey is a destination and transit country, and to a lesser extent source country, for women, men and children subjected to trafficking in human beings for sexual and labour exploitation. Authorities reported that 303 victims of trafficking in human beings were identified in 2017, compared with 181 in 2016. The main shortcomings identified are a limited accommodation capacity for victims and weak inter-agency cooperation, which has a particularly negative impact on identifying victims. A comprehensive multidisciplinary, victim-focused approach to trafficking in human beings needs to be developed.

Sustainable Development Goal 16: Peace, Justice and Strong Institutions

The threats of international homicide, violence against children, human trafficking and sexual violence are important to address to promote peaceful and inclusive societies for sustainable development. They pave the way for the provision of access to justice for all and for building effective, accountable institutions at all levels. While homicide and trafficking cases have seen significant progress over the past decade, there are still thousands of people at greater risk of intentional murder within Latin America, Sub-Saharan Africa and around

² Regulation on Combating Human Trafficking and Protection of Victims, published in the Official Gazette No: 29656 on 17 March 2016

Asia. Children's rights violations through aggression and sexual violence continue to plague many countries around the world, especially as under-reporting and lack of data aggravate the problem.

To tackle these challenges and build a more peaceful, inclusive societies, there needs to be more efficient and transparent regulations put in place and comprehensive, realistic government budgets. One of the first steps towards protecting individual rights is the implementation of worldwide birth registration and the creation of more independent national human rights institutions around the world.

In the framework of the 2030 Agenda for Sustainable Development it is considered that this Action will contribute to the Sustainable Development Goal 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

LESSONS LEARNED AND LINK TO PREVIOUS FINANCIAL ASSISTANCE

The first EU funded project "Supporting Turkey's Efforts to Combat Human Trafficking and Promote Access to Justice for all Trafficked Persons" was implemented by IOM Mission to Turkey between 2007 - 2009. One of the main aims of the project was to establish a supporting mechanism to the national task force. The first project supported the development of the first National Action Plan on Combating THB. However, a number of activities linked to the ratification of document were delayed due to the legislative, administrative and bureaucratic procedures that required the involvement of many institutions. As a result, it was recommended that future projects aiming to develop legislation or policy should take the potential delay of approval processes into consideration when structuring the work plan. The Protection of Victims of Human Trafficking Project includes many activities regarding combatting human trafficking and protection of victims and it was implemented between 2014 and 2016. Currently it is considered to form a new comprehensive project in the field of human trafficking with careful consideration of outputs of the mentioned project.

Furthermore, in 2014 IOM implemented the EU-funded project titled 'Protecting Victims of Human Trafficking'. The project supported implementation of the national strategy and policy on organised crime including trafficking of persons in line with the National Action Plan and the Council of Europe Convention on Action against Trafficking in Human Beings. Given the fact that DGMM and its Department of Protection of the Victims of Human Trafficking were newly established at the time, the project sought to build the capacity of newly recruited employees particularly in relation to the CoE Convention and anti-trafficking regulations. Based on the findings of the project, IOM recommended the **adoption of a third National Action Plan** to support the upcoming counter trafficking of human beings strategy of the country and align with the current context. Furthermore, it was observed that the **involvement of NGOs** in counter trafficking remained insufficient. Therefore, a lesson learned was that future projects should seek to support further NGO cooperation with the government as civil society is largely uninvolved in anti-trafficking efforts. Lastly, the project identified the need for further trainings to first responders to **ensure consistent victim identification and protection**. Based on these recommendations, IOM has supported DGMM to develop the current proposal. Technical assistance (personnel, cash and in kind assistance) and funding were provided to NGOs provide services to victims of human trafficking.

2. INTERVENTION LOGIC

LOGICAL FRAMEWORK MATRIX

OVERALL OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	
To enhance the access to protection services of victims of trafficking of human beings in Turkey	<ul style="list-style-type: none"> Application of the 3rd National Action Plan by MoI Progress made towards meeting accession criteria. 	DG NEAR – Turkey Report DG Home – VLD Report Administrative reports of the public institutions in Turkey	
SPECIFIC OBJECTIVE (outcomes)	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	ASSUMPTIONS
To strengthen the anti-trafficking response of key stakeholders (including, but not limited to MoI, law enforcement agencies, civil society) and the victim protection mechanisms in Turkey.	<ul style="list-style-type: none"> Number of key stakeholders that have developed response plan to THB. Increase in the number of identified and supported victims by 20% (data to be disaggregated, on the basis of gender, age, nationality and form of exploitation) At least 40 VoTs stay in the pilot shelter and receive services (data to be disaggregated, on the basis of gender, age, nationality and form of exploitation). 	Administrative reports of the public institutions in Turkey Strategies, plans adopted by key stakeholders in response to THB. Statistical data gathered from the law enforcement agencies in Turkey DGMM Statistics IOM Quick Statistics	Commitment of DGMM and all relevant institutions for the better implementation of the activity.
RESULTS (outputs)	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	ASSUMPTIONS
<ul style="list-style-type: none"> Result 1: A draft Third National Action Plan is prepared in line with the CoE Convention, strengthening national counter-trafficking structures Result 2: The technical capacity of NGOs to directly assist a greater number of identified and potential victims of trafficking is increased. Result 3: Capacity to develop, coordinate and implement effective trafficking prevention strategies and victim assistance at the national and local level has increased Result 4: Capacity of services to appropriately assist victims of trafficking in human beings, taking into account their gender, age, nationality and the consequences of the form of exploitation they have been subjected to, has increased. Result 5: Awareness is raised among particularly vulnerable individuals and the public on how to recognize trafficking in human being indicators and seek assistance. Result 6: Safe accommodation, necessary living conditions and adequate services for victims of human trafficking in one pilot shelter are ensured. 	<ul style="list-style-type: none"> The third draft National Action Plan on Human Trafficking is drafted in consultation with key stakeholders, including civil society, taking into account the gender specificity of the crime, with women and girls disproportionately targeted. Increased number of NGOs able to refer and assist VoTs Increased number of detection of THB victims by NGOs supported by this action Number of detection of THB victims by public stakeholders supported by this action Number of victims receiving assistance (e.g. AVR) disaggregated by gender, age, nationality and form of exploitation. Number of public and private sector workers on human trafficking informed through the awareness raising activities and number of vulnerable persons informed concerning human trafficking. Number of pilot shelters run by DGMM refurbished and maintained Number of victims (disaggregated by gender, age, nationality and form of exploitation) receiving adequate services in the one pilot shelter run by DGMM supported by this Action 	DGMM's Annual Report on Human Trafficking. IOM project reports, factsheet	Strong ownership of DGMM staff during the implementation of the activity.

(**) Relevant activities have to be included only in the following sub-section.

DESCRIPTION OF ACTIVITIES

The Action aims to achieve six results under the following activities:

Result 1: A draft Third National Action Plan is prepared in line with the CoE Convention, strengthening national counter-trafficking structures.

These activities will support the preparation of the draft third NAP under this project according to article 7.1.b of the Turkish Regulation on Combatting Trafficking and the Protection of Victims. In line with this, DGMM will establish an Expert Group to lead and coordinate the development of the third draft NAP. The NAP will address all aspect of THB including prevention of the crime. The development of this document will be supported by capacity building activities, include consultative meetings involving CSOs, document analysis, workshops, study visits etc. to be held with relevant counter trafficking stakeholders, including civil society.

Target group: Relevant counter trafficking stakeholders (including MoI, MoJ, civil society) as well as law enforcement agencies.

Result 2: The technical capacity of NGOs to directly assist a greater number of identified and potential victims of trafficking is increased.

These activities will aim to strengthen Turkish's National Referral Mechanism by building the capacity of relevant NGOs active in THB³. This is planned to be achieved through a number of activities including but not limited to cooperation with, and training of NGOs on VoTs support, and workshops to enhance inter-agency cooperation.

Target group: NGOs

Result 3: Capacity to develop, coordinate and implement effective trafficking prevention strategies and victim assistance at the national and local level has increased

This result will be achieved by developing and/or updating counter trafficking training curriculums to be used at trainings, and delivering a combination of trainings on designing a relevant response to the crime of trafficking, effectively combatting human trafficking to relevant public stakeholders, particularly front-line service providers.

Target group: Public Stakeholders including law enforcement agencies, (Units dealing with relating human trafficking and border security of Police Forces, Gendarmerie and Turkish Coast Guards, Ministry of Family, Labour and Social Services, Ministry of Justice, Ministry of Health local administration and NGOs.

Result 4: Capacity of services to assist appropriately assist victims of trafficking in human beings, taking into account their gender, age, nationality and the consequences of the form of exploitation they have been subjected to, has increased.

The activities under this result will include the provision of support services based on an assessment of needs (accommodation in shelter or safe locations, access to healthcare services, psychosocial support, social services and assistance, legal assistance, interpretation services etc.) through the amongst others, following means: referral to relevant service providers, assisted voluntary return and reintegration assistance including cash assistance for victims of human trafficking. 70% of the foreign victims identified annually will be assisted by one or more of these support services.

Target group: Victims of human trafficking, through disaggregated data, on the basis of gender, age, nationality and form of exploitation.

³ In this regard it is relevant to build on results of and avoid duplication with the Transnational Referral Mechanism Model

Result 5: Awareness is raised among particularly vulnerable individuals and the public on how to recognize trafficking in human being indicators⁴ and seek assistance.

The activities will include a number of awareness raising initiatives (such as campaigns) among stakeholders involved and the public at large concerning the three elements of the concept of human trafficking (action, means and all forms of exploitation).

Target group: Public and private institutions and individuals.

Result 6: Safe accommodation, necessary living conditions and adequate services for victims of human trafficking in one pilot shelter are ensured.

Provision of health care services, psycho-social support services, legal aid services, interpretation services, food, hygiene and other facilities necessary for daily lives, security of facilities etc. in order for victims of human trafficking to be able to overcome their traumas and reintegrate into society. To achieve this result support to maintenance and refurbishment for one shelter run by DGMM will be provided by IOM in a province which is to be determined.

Target: Victims of human trafficking, through disaggregated data, on the basis of gender, age, nationality and form of exploitation

RISKS

Risk 1: Insufficient number of NGOs working in the area of victims of human trafficking

Mitigating measure: A wide/inclusive approach will be adopted and NGOs working on women, children, labour will be consulted and included in the project.

Risk 2: Challenges in constructive cooperation among the various national and international institutions and agencies involved.

Mitigating measure: High level commitment and engagement from key stakeholders will be sought by DGMM with the support of MoI.

CONDITIONS FOR IMPLEMENTATION

Conditionality specific for the project:

- The implementation of the action will require the prior adoption of a country-wide strategy, or similar document, to effectively coordinate with NGOs to combat human trafficking and protect VoTs in Turkey. It is expected that the development of this document will be done in a participatory manner.
- Procedures for the maintenance and refurbishment for the shelter to be run by DGMM can only start after a suitable location is secured and a human resource plan is developed for the running of the shelter.

The project will be implemented through a complementing set of activity clusters as well as consultations with local and/or central stakeholders, which are a **precondition for the activities' sustainability**. In this context, this initiative ensures the collaboration and coordination with partners, in particular civil society, who are dedicated to and focused on the action, which guarantees participation and ownership, as well as sustainability and pertinence.

The project implementation methodology also envisages active participation of governmental institutions in monitoring of the project activities, to ensure project relevance in accordance with institutional priorities.

⁴ as found in the Palermo Protocol

A **prerequisite** for an efficient impact of activities is that:

- targeted institutions remain dedicated to their plan of action,
- the institutions will continue to offer guidelines and equip their staff with knowledge on the relevant legislation;
- there will be transfer of knowledge even after the project ends;
- the trained staff remains with the institutions;
- institutions remain dedicated to the harmonisation of the legislation with EU and international standards, especially in the area of human trafficking and migrant smuggling.

Considering that there are remedies to the above (such as the transfer of knowledge intra-institutionally as well as international obligations which the country must meet), the assumptions do not pose an evident or substantive threat to the sustainability of the action.

Failure to comply with the requirements set out above may lead to a recovery of funds under this programme and/or the re-allocation of future funding.

3. IMPLEMENTATION ARRANGEMENTS

ROLES AND RESPONSIBILITIES

The Beneficiary of the activity is the Ministry of Interior, Directorate General of Migration Management (DGMM). DGMM will be the coordinator of all activities and lead the expert group to develop the 3rd NAP. The Project Steering Committee will be chaired by DGMM and include representatives from the key stakeholders (see below) as well as a number of NGOs. These latter shall be selected on the bases of a set of transparent criteria agreed during the inception phase with the Steering Committee and the European Union Delegation.

Ministry of Interior's Department for EU Affairs and Foreign Relation, Turkish National Police, Turkish Jandarma, Turkish Coast Guard, Ministry of Justice, Ministry of Health, Ministry of Labour, Social Services and Family, Local authorities, NGO's are the main stakeholders in the project. Ministries focal points will be included in the Project Steering Committee.

IMPLEMENTATION METHOD(S) AND TYPE(S) OF FINANCING

This Action will be implemented under indirect management by the CFCU. It is intended that the CFCU will conclude a Grant Agreement directly awarded to IOM. In addition, a contract planned for the evaluation of activities within this action will be carried out under direct management by the European Commission.

The International Organisation for Migration (IOM) – the UN Migration Agency opened its first offices in Turkey in 1991. IOM's partnership with the Republic of Turkey was formalised in November 2004 when Turkey was granted member status to IOM. The partnership between IOM and Turkey continued since then at all levels and areas regarding migration management, including combatting human trafficking.

IOM is the leading international organisation working on trafficking in persons (TIP) in Turkey and globally. IOM has implemented over 20 counter-trafficking projects covering protection, prevention, and prosecution since 2004 resulting in solid relationships with the Government of Turkey (GoT) and NGOs. Including a GoT-EU funded IPA project 'Protecting Victims of Human Trafficking', which was successfully concluded in 2016. Currently, IOM is also implementing an IPA funded project titled "Supporting Turkey's Efforts to Manage Migration" which has a significant component on combatting human trafficking. Key achievements of IOM's projects include the provision of specialized direct assistance to a total of over 1300 Victims of

Trafficking (VoTs) including specialized shelter, medical and psychological care, and assisted voluntary return/repatriation and reintegration (AVRR); establishment and handover of the 157 hotline to the GoT; Standard Operating Procedures (SOPs) on interagency cooperation and shelter management; and development of a TiP module under the 'Gocnet' data management software for the Directorate General of Migration Management (DGMM).

IOM has also initiated a 'TiP in Crisis' program in Southeast Turkey which includes J/TiP support under the project "Preventing conflict-driven trafficking in persons and ensuring a protection-sensitive approach across the Levant". IOM's 'TiP in Crisis' program has been developed to mainstream a comprehensive TiP response across the emergency response at local, national and regional levels, through training frontline responders; developing tailored assessment tools; delivering community outreach and prevention activities, and tailoring existing referral channels, case management procedures and service provision to VoTs and at-risk populations.

IOM has also collected critical data on TiP trends in 2017 thorough IOM Turkey's Displacement Tracking Matrix with recent findings indicating that up to 26% of migrants have been subject to at least one exploitative practice in Turkey.

IOM works closely with key TiP stakeholders, including DGMM, the Ministry of Labour, Social Services and Family (MoLSSF), law enforcement, prosecutors and key TiP NGOs, and continues to work with all relevant TiP partners to achieve organisational strategic objectives as follows: (1) support the GoT to develop and integrate TiP mechanisms into its migration management strategy at the policy, regulatory, and operational levels and enhance effective response capacity; (2) mainstream TiP responses in ongoing humanitarian assistance and emergency response mechanisms; (3) support the GoT to fulfil its regional and international commitments on TiP, including the Council of Europe's Convention Against Trafficking in Human Beings; and (4) support the development and implementation of context-specific prosecution, protection and prevention frameworks.

In addition to the capacity building and policy development activities within the implemented projects in Turkey, IOM has been assisting victims of trafficking with direct assistance as well as assisted voluntary return and reintegration. Through the large number of IOM Country Offices throughout the world, IOM is able to assist the victims identified in Turkey both at the country of destination and country of origin in order to enable a comprehensive approach.

Globally, IOM works in partnership with governments, the United Nations, international and non-governmental organisations, the private sector and development partners on all aspects of counter-trafficking responses – prevention, protection, and prosecution. Since the mid-1990s, IOM and its partners have provided protection and assistance to close to 100,000 men, women and children, who were trafficked for sexual and labour exploitation, slavery or practices similar to slavery, servitude, or for organ removal. Agriculture, fishing, domestic work and hospitality, commercial sexual exploitation, pornography, begging, construction and manufacturing are some of the sectors in which victims were exploited.

IOM takes a comprehensive approach to addressing human trafficking. Respect for human rights, the physical, mental and social well-being of the individual and his or her community, and the sustainability of our actions through institutional capacity development and partnerships are at the centre of all of IOM's counter-trafficking efforts. IOM encourages the entire international community to engage in the fight against trafficking. It does so by participating in, and leading, a number of regional and international multilateral processes, including the Inter-Agency Coordination Group against Trafficking in Persons (ICAT), and Alliance 8.7. IOM also works with the humanitarian community to ensure that the risk of trafficking is mitigated and addressed from the earliest stages of humanitarian responses.

The proposed action will complement and build upon IOM Turkey's existing projects in the area of TiP and assistance to vulnerable migrants. Particularly, VoTs identified and referred through the mechanisms established under this project will be able to benefit from IOM's AVRR program, (supported by the EU, UK and Norway).

4. PERFORMANCE MEASUREMENT

METHODOLOGY FOR MONITORING (AND EVALUATION)

In line with the IPA II Implementing Regulation 447/2014, an IPA II beneficiary who has been entrusted budget implementation tasks of IPA II assistance shall be responsible for arranging external evaluations of the programmes it manages.

The evaluations will be carried out following DG NEAR guidelines on linking planning/programming, monitoring and evaluation⁵. A Reference Group comprising the key stakeholders of this action will be set up for every evaluation to steer the evaluation process and ensure the required quality level of the evaluation outputs as well the proper follow up of the recommendations of the evaluation.

The European Commission may carry out a mid-term, a final or an ex-post evaluation for this Action or its components via independent consultants, through a joint mission or via an implementing partner. For this purpose an amount of EUR 50,000 is planned and set aside under the budget of this Action.⁶ The evaluations will be carried out as prescribed by the DG NEAR guidelines for evaluations.

The overall implementation of IPA assistance in Turkey is subject to monitoring in accordance with the Article 18(1) of the IPA II IR. This implies setting specific monitoring committees which mandates must be formally defined and agreed upon with the EC.

During the implementation of the IPA II period, monitoring is conducted via various levels of monitoring committees' tools:

In this respect, a Monitoring Committee, which convenes twice a year and is co-chaired by the NIPAC and representatives of the EC will be in place.

In addition to this, in the new IPA-II period, lead institutions are responsible from establishing sector level monitoring by policy area or by program six months after the entry into force of the Financing Agreement. The meetings will be held twice a year and are composed of representatives from NIPAC, NAO, CFCU, European Commission, the lead institution of the sector/sub-sector and representatives of beneficiary institutions, donor institutions and NGOs. Participation of other stakeholders will be ensured when deemed necessary. As for the Home Affairs sub-sector, monitoring meetings will be organised by MoI and will include discussions on relevant strategies and constitute a link between implementation and further programming phases.

As for the activity level monitoring, Project Steering Committee (PSC) will serve for this purpose. PSC meets twice a year or more frequently where relevant as per request of the members, to monitor the implementation of the project, achievement of results against indicators in the Action Document, and to agree on corrective actions as appropriate. The conclusions of the Steering Committee meetings will be agreed by all participants in the minutes of the meetings. The Steering Committees will be composed of the representatives of project beneficiaries, the lead institution of the sub-sector, NIPAC, NAO, Central Finance & Contracts Unit and EU Delegation to Turkey. Participation of other stakeholders will be ensured when deemed necessary.

⁵ https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/near_guidelines.zip

⁶ In case a mid-term or final evaluation is not foreseen, the European Commission may, during implementation, decide to undertake such an evaluation for duly justified reasons either on its own decision or on the initiative of the partner.

In addition, the Action might be subject to external result oriented monitoring in line with the European Commission rules and procedures set in the Financing Agreement.

INDICATOR MEASUREMENT

Indicator	Baseline (value + year) (2)	Target 2020 (3)	Final Target (2023) (4)	Source of information
CSP indicator (impact/outcome)....(1)				
Third draft National Action Plan on Human Trafficking is adopted by MoI	0 (2018)	0 (2020)	1	DGMM's Annual Report on Human Trafficking IOM project reports, factsheet.
Number of key stakeholders that have developed response plan to THB	14 (2018)	22 (2020)	30	DGMM's Annual Report on Human Trafficking DGMM Annual Activity Report
Annual number of victims staying in shelters run by DGMM and receiving services (data to be disaggregated, on the basis of gender, age, nationality and form of exploitation) as a result of this Action	60 (80% female/20% male) (2018)	200 (80% female/20% male) (2020)	720 (80% female/20% male)	DGMM Statistics DGMM's Annual Report on Human Trafficking
Number of public and private sector workers on human trafficking informed through the awareness raising activities	0 (2018)		1000-2000	DGMM's Annual Report on Human Trafficking IOM project reports, factsheet
Number of vulnerable persons informed concerning human trafficking	0 (2018)		2000	DGMM's Annual Report on Human Trafficking IOM project reports, factsheet
Number of shelters run by DGMM refurbished and maintained with support of this Action	0 (2018)	0 (2020)	1	DGMM Statistics DGMM's Annual Report on Human Trafficking

(1) This is the related indicator as included in the Indicative Strategy Paper (for reference only)

(2) The agreed baseline year is 2010 (to be inserted in brackets in the top row). If for the chosen indicator, there are no available data for 2010, it is advisable to refer to the following years – 2011, 2012. The year of reference may not be the same either for all indicators selected due to a lack of data availability; in this case, the year should then be inserted in each cell in brackets. The baseline value may be "0" (i.e. no reference values are available as the Action represents a novelty for the beneficiary) but cannot be left empty or include references such as "N/A" or "will be determined later".

(3) The target year CANNOT be modified.

(4) This will be a useful reference to continue measuring the outcome of IPA II support beyond the 2014-2020 multi-annual financial period. If the Action is completed before 2020 (year for the performance reward), this value and that in the 2020 target column must be the same.

5. SECTOR APPROACH ASSESSMENT

Due to various but inter linked issues in the area of Justice, Freedom and Security, number of different national strategies and action plans are in force.

The 10th National Development Plan foresees the establishment of an effective monitoring and surveillance system for immigrants, refugees, illegal workers, and transit passengers. Furthermore a cooperation mechanism will be set among institutions providing public security services in order to ensure an integrated and effective system. Internal security is also covered in 10th Development Plan: it is aimed to strengthen security services and establish a secure business and living environment in Turkey.

Turkey's Strategy Document and National Action Plan on Irregular Migration includes priorities on preventing irregular migration and strengthening measures related to fighting against organised crimes related to migration; reducing irregular labour migration through comprehensive policies; strengthening the return (removal) system for irregular migrants within the framework of human rights standards; developing systematic data collection, analysis and sharing as well as conducting evidence based research to contribute to policies regarding irregular migration; respecting human rights of irregular migrants and taking measures to protect vulnerable irregular migrants and strengthening development focused regional and international cooperation to contribute to prevention of irregular migration.

National Action Plan on the Implementation of the Readmission Agreement between Turkey and the EU is focused on the strengthening legal, administrative and technical capacities and is in close relation with the **Visa Liberalisation Roadmap** that identifies the areas where Turkey will have to undertake legislative and administrative reforms with a view to establish a secure environment for visa-free travel, including provisions about the implementation of the Readmission Agreement.

Strategic Plan of the Ministry of Interior (2015-2019) reflects the institutional issues as well as the issues related with MoI alignment activities for EU with the general objective to enable internal security, migration management and border management services within the scope of human rights and ensure a peaceful atmosphere.

The Ministry of Interior (MoI) is the lead institution of the sub-sector with its affiliated bodies and central institutions and is responsible for the overall coordination, programming and monitoring-evaluation of the activities in the sub-sector through the Department of EU Affairs and Foreign Relations. Programming activities have been coordinated by the IPA Unit of the lead institution and Technical Level Working Groups have been organized for the preparation of the Annual Action Programmes. In addition to this, CFCU serves as the Contracting Authority to fulfil the duties arising from tendering, contract management and financial management of the projects.

In the area of Migration and Asylum, DGMM is the main authorised institution to implement migration policies of Turkey and coordinate migration related issues in Turkey. In this regard, The Law on Foreigners and International Protection was prepared and came in to force on 04.04.2014. In terms of monitoring of EU funds under the IPA structure, monitoring and evaluation units were established by the Prime Ministry Circular No. 2009/18.

6. CROSS-CUTTING ISSUES

GENDER MAINSTREAMING

Regarding the Activity, gender specific aspects of counter-trafficking of human beings need to be taken into account both on the policy and programme side by mainstreaming all relevant activities. The majority of VoTs identified in Turkey are female and therefore have specific gender-based needs and vulnerabilities that will be addressed through the project. This includes the need for specialized gender-sensitive medical and psychological care, shelter, livelihoods support and gender-specific AVRR measures. Furthermore, an

increasing number of male VoTs were identified in 2017, highlighting the need also for gender-sensitive measures targeting male VoTs under the project (for example, a male VoT shelter may be considered). IOM and DGMM will ensure mainstreaming of gender sensitivity in all activities particularly in the direct assistance to VoTs and the development of training curricula, thus enhancing the capacities of the stakeholders to tailor and implement gender sensitive protection activities.

The project will promote a balanced participation and selection of direct beneficiaries from both genders, and will **collect gender disaggregated data**⁷ for its direct beneficiaries, including for beneficiaries of training/technical support, as well as victims identified and provided with protection services and assistance under the project.

EQUAL OPPORTUNITIES

The Home Affairs sub-sector aims at a meaningful participation of all individuals, both men and women in the design, implementation, monitoring and evaluation of all our operations and programmes. To implement this commitment, the participation level of men and women in training sessions and similar activities will be documented for monitoring purposes at the level of Steering Committees.

Equal opportunity principles and practices in ensuring equitable gender participation in this Action will be guaranteed. Male and female participation in the Activities will be based on EU standards and assured by official announcements published to recruit the necessary staff for the Activities. The main criteria for recruitment will be qualifications and experience in similar projects, not sex or age. Both men and women will have equal opportunities and salaries.

Appropriate professional qualifications and experience will be the factors for personnel recruitment and evaluation. When recruiting personnel for this Action, there will be made no distinction based on sex, race, or religion.

MINORITIES AND VULNERABLE GROUPS

According to the Turkish Constitutional System, the word minority encompasses only groups of persons defined and recognised as such on the basis of multilateral or bilateral instruments to which Turkey is a party. This Action has no negative impact on minority and vulnerable groups.

ENGAGEMENT WITH CIVIL SOCIETY (AND IF RELEVANT OTHER NON-STATE STAKEHOLDERS)

Some of the components under the Activity include the participation of NGOs. A wide range of civil society actors will contribute with their comments during the implementation phase.

ENVIRONMENT AND CLIMATE CHANGE (AND IF RELEVANT DISASTER RESILIENCE)

The activities under this Action are envisaged not to have any negative effects on the environment or on climate change.

7. SUSTAINABILITY

This activity is a follow-up of previous project “Protecting Victims of Human Trafficking” programmed in 2011 to strengthen the capacity of Turkish institutions to counter trafficking of human beings. In addition, the overall strengthening of Turkish migration management system as well as borders sub-sector, help further alignment with the EU Acquis and increase efficiency of implementation in line with best practices.

⁷ For all relevant indicators, data are to be gathered disaggregated, on the basis of gender, age, nationality and form of exploitation.

The sustainability of the results of the sector support will be ensured by the improved administrative structure. The government of Turkey is committed to carrying out and furthering political and judicial reforms, as reflected in strategy documents.

8. COMMUNICATION AND VISIBILITY

Communication and visibility will be given high importance during the implementation of the Action. The implementation of the communication activities shall be funded from the amounts allocated to the Action.

All necessary measures will be taken to publicise the fact that the Action has received funding from the EU in line with the Communication and Visibility Manual for EU External Actions. Additional Visibility Guidelines developed by the European Commission (DG NEAR) will have to be followed.

Visibility and communication actions shall demonstrate how the intervention contributes to the agreed programme objectives and the accession process. Actions shall be aimed at strengthening general public awareness and support of interventions financed and the objectives pursued. The actions shall aim at highlighting to the relevant target audiences the added value and impact of the EU's interventions and will promote transparency and accountability on the use of funds.

It is the responsibility of the beneficiary to keep the European Commission fully informed of the planning and implementation of the specific visibility and communication activities.

The beneficiary shall report on its visibility and communication actions in the report submitted to the IPA monitoring committee and the sectorial monitoring committee.

All projects /contract implemented under this programme shall comply with the **Visibility Guidelines for European Commission Projects in Turkey** published by the EUD to Turkey, at http://www.upa.info.tr/AB_Mali_Destegi/Gorunurluk,Visi.html .

All communication and visibility activities should be carried out in close co-operation with the CFCU and the EUD to Ankara. The CFCU and the EUD are the main authorities in charge of reviewing and approving visibility-related materials and activities.

The EU-Turkey cooperation logo should be accompanied by the following text:

“This project is co-funded by the European Union.”

Whether used in the form of the EU-Turkey cooperation logo for information materials or separately at events, the EU and Turkish flag have to enjoy at least double prominence each, both in terms of size and placement in relation to other displayed logos and should appear on all materials and at all events as per the Communication and Visibility Manual for European Union External Actions. At visibility events, the Turkish and the EU flag have to be displayed prominently and separately from any logos.

Logos of the beneficiary institution and the CFCU should be clearly separated from the EU-Turkey partnership logo and be maximum half the size of each flag. The logos will not be accompanied by any text. The CFCU and beneficiary logo will be on the lower left-hand corner and lower right-hand corner respectively. The consultant logo with the same size will be in the middle of the CFCU and beneficiary logo. If the consultant is a consortium, only the logo of the consortium leader will be displayed.

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“The content of this publication is the sole responsibility of name of the author/Supplier/implementing partner – and can in no way be taken to reflect the views of the European Union”

9. BUDGET

Implementation Modalities	Budget (€)		Timeline	
	Total	EU contribution	Launch of procedure	Contract signature ⁸
Direct Grant with IOM	4 950 000	4 950 000	Q4 2019	Q2 2021
Evaluation	50 000	50 000	Q4 2019	Q2 2021
TOTAL	5 000 000	5 000 000		

Timeline : QUARTER (Q1, Q2, Q3, Q4) YEAR