

Civilian Oversight Phase III Final Independent Evaluation
Management Response
26.01.2022

Evaluation recommendation 1. Without clear governmental commitment and the adoption of legal and policy documents, UNDP and EUD should not continue supporting civilian oversight over ISF in Turkey. The main prerequisite for continuation of the assistance to civilian oversight if the ISF is demonstrated commitment of the Turkey's authorities and adoption of the required legal and policy framework to regulate establishment, roles, responsibilities and relationships between institutions under the civilian oversight of the ISF at the national and sub-national levels.				
Management response: UNDP partially accepts this recommendation. Civilian oversight mechanisms can take different forms one of which is the proposed establishment of NCPO and LPSB by the COIII Project. However, civilian oversight can also entail reviewing government activities, most commonly accusations of police misconduct. For this aspect, In MoI, there is a Ministerial Supreme Inspection Board to which citizen can apply for ISF's misconduct. The Board plays a key role in terms of improvement in exercising fundamental rights, proper investigation, examination of the ISF's misconduct as well as its prevention and elimination. UNDP plans to propose a project to improve the application channels for CSOs and citizens to this Board and the Board capacity to effectively deal with police and gendarmerie misconduct. Such broad categorizations in Evaluation recommendation gives harm to realization of such key project ideas that are also addressed by the Progress reports of the EC as key needed areas of Turkey. That is why, the UNDP partially accepts this recommendation only from the point of COIII project (with a possible future continuation with NCPO and LSPS oriented aspects) with a reservation that other functions of MoI and other possible priority areas such as the police misconduct complaints submitted to Ministerial Supreme Inspection Board can still be pursued. Therefore, in order not to be broadly restrictive, the scope should be focused to COIII Project domain. Suggested approach is Without clear governmental commitment and the adoption of legal and policy documents, UNDP and EUD should not continue supporting NCPO and LPSB related civilian oversight over ISF in Turkey. There will not be a successor project like CO IV or strengthening of LSPB if the adoption of legal and policy documents will not be in place.				
Key Action:	Completion date	Responsible unit(s)	Tracking	
			Comments	Status (initiated, completed or no due date)
1.1 The legal framework prepared by UNDP regarding the establishment of NCPO (central level) and LPSB (local level) will be adopted by the government	December 2022	MoI, Presidency of Turkey	Minister of Interior in closing conference explicitly said their political will for adaptation. Draft legal framework is mature and planned to be submitted by the MoI to the President in 2022. However, this is the part of political process	Initiated

Civilian Oversight Phase III Final Independent Evaluation
Management Response
26.01.2022

			which is beyond the scope of UNDP. Under Presidential System, adaptation of this legal framework is under the authority of the President through a Presidential Decree.	
<p>Evaluation recommendation 2. Assist implementation of the legal and policy frameworks for civilian oversight of the ISF.</p> <p>The priority remains to support the MoI and its departments, the GNAT, and other national authorities to design a plan for implementation of legal and policy frameworks related to the civilian oversight, including clear milestones and targets.</p> <p>Moreover, the FEC recommends strengthening technical and operational capacities of the main institutions within the civilian oversight system (MoI, GNAT and sub-national authorities) to implement assigned functions. There is a need to balance between general and more needs-based training programs. Some of the general topics could be, for example, introduction to the (new) legal framework for civilian oversight; roles and responsibilities including institutional coordination and cooperation mechanisms; management of civilian oversight (steering mechanisms, monitoring, reporting), advantages of participation/ CSO engagement for civilian oversight; gender mainstreaming in civilian oversight. At the same time, more specialized training programs should address priorities based on the results of the training needs assessment and the assigned functions of the respective institutions.</p> <p>Achieving measurable changes in the security governance systems, especially ensuring transparent and accountable ISF through stronger citizen oversight requires time and coordinated efforts of authorities, civil society and other national and international development partners. Therefore, the FEC recommends that UNDP, EU and participating countries consider long-term commitment (e.g., from five to seven years) for the new initiative.</p>				
<p>Management response: This recommendation is valid and logical, but UNDP does not have current pipeline on this aspect of Civilian Oversight. This recommendation is considered for future reference.</p>				
Key Action:	Completion date	Responsible unit(s)	Tracking	
			Comments	Status
2.1 After adaptation of legal framework, new TA project focused on more needs-based capacity needs will be designed by UNDP support the MoI and its departments, the GNAT, and other national authorities	December 2022	MoI	MoI and pilot LSPBs are already supported for concrete plan for implementation of legal and policy frameworks related to the civilian oversight, including clear milestones and targets. Total 19 Local Security Plan were	Not started

Civilian Oversight Phase III Final Independent Evaluation
Management Response
26.01.2022

			prepared (9 of them was updated and 10 of them are newly prepared)
<p>Evaluation recommendation 3. Assist establishment and functioning of the National Crime Prevention Office</p> <p>The FEC recommends designing a comprehensive plan for establishing and strengthening core functions of the National Crime Prevention Office (upon adoption of the Presidential decree and amendments in 6 required laws). This assistance should include NCPO operational and management systems.</p> <p>There is a need to support NCPO to translate policies into an operational strategy that will associate external partners and guide the different bodies of the Ministry and especially the governorates and the law enforcement.</p> <p>The Project should support these strategic capacities, also looking and addressing more operational capacities to implement the concrete measures of the strategic action plans, to manage the budget, to ensure the communication, to train and educate and ultimately to assess and adjust the policy.</p> <p>In addition to institutional strengthening around core service lines as envisaged by the law, there is a need to strengthen its coordination capacities and establish a platform for cooperation with sub-national/ regional crime prevention boards throughout the country.</p> <p>However, the FEC is aware that the national policy will define the NCPO, set the rules of the game and identify the key players. For that reason, the build-up of the NCPO will be incremental with each step of its initial activities helping to shape its perimeter and its organization.</p>			
<p>Management response: UNDP will have to reject this recommendation. This is because there is no legal framework regarding the establishment of NCPO, so this recommendation is considered for future reference. The CO III project was ended as of December 2021 and there is no available project/fund for this recommended action. Any kind of NCPO related action can only be taken by UNDP if the legal framework regarding the establishment of NCPO (central level) will be adopted by the Turkish government. If that pre-condition can be fulfilled at political level, UNDP can initiate a project including below actions in line with the recommendation for which responsible unit will be MoI.</p> <ul style="list-style-type: none"> - Definition of job descriptions for NCPO experts, and design of a NCPO training curriculum (focused on crime prevention, and ISFs service orientation, evidence-based assessment of prevention projects) and establishing a ToT team within MoI will take place. Capacity building for NCPO will be provided for review of allocation of funds to LPSB prevention projects - NCPO will establish a national network promoting a culture of prevention open to all ISFs, locally elected officials, NGOs, civil society 			
<p>Evaluation recommendation 4. Support establishment of new and strengthening of the existing LPSBs.</p> <p>The FEC recommends that COIII support establishing new and strengthening the existing LPSBs. For the existing LPSB, the priority should be to enhance strategic planning, priority setting and participatory decision-making capacities of the LPSB members in the specific security areas. These efforts should be supported by strengthening LPSB members' capabilities for gender-sensitive and pro-poor analysis.</p> <p>The FEC recommends improving LPSB management capacities for implementation of Action Plans, monitoring activities, and communicating results/ reporting on progress. For the newly established LPSBs, the FEC recommends using the methods and approaches that have been tested during the COIII and previous projects, from the screening and assessment, to tailor made support. The FEC recommends capacitating LPSB members to facilitate and accelerate civic engagement and ensure effective and efficient functioning for the development and implementation of the Local Security Action Plans. The support should aim to decrease the crime rate and violence through participation and ownership of local stakeholders, track trust to ISFs and satisfaction from internal security services at the local level.</p> <p>The Project should help LPSBs collaborate with different organizations for financial resources, training and know-how in line with their activities. Local Prevention and Security Boards need a budget and dedicated resources for effective crime prevention and sustainability. Therefore, the FEC recommends that LPSBs generate international, national or local funds for implementing action plans and build networks for training and benefiting from know-how for crime prevention activities.</p>			

Civilian Oversight Phase III Final Independent Evaluation

Management Response

26.01.2022

The FEC recommends developing LPSB capacities to raise awareness on civilian oversight of ISFs to oversee the partnership of ISFs and CSOs in the framework of LPSB. It is essential to do these activities constantly to get participants motivated and attract more public interest to the LPSBs.

In addition to delivery of capacity development support, the Project should consider networking and exchange of knowledge and know-how among the experienced and newly established local boards.

Management response: UNDP will have to reject this recommendation. This is because there is no legal framework regarding the establishment and dissemination of LPSBs across Turkey, so this recommendation is considered for future reference. Any kind of LPSB related action can only be taken by UNDP if the legal framework regarding the establishment of NCPO (central level) and LPSB (local level) will be adopted by the Turkish government. If that pre-condition can be fulfilled at political level, UNDP can initiate a project including below actions for LPSBs in line with the recommendation for which responsible unit will be the MoI.

- Establishment of Human Resources, Training and Technical Support Unit within NCPO for LPSB members.
 - Mechanisms for funds allocation for preventive actions against crime (social, educational, situational etc...) need to be put in place for meeting district prevention needs.
 - Supporting implementation of Action Plans, monitoring activities, and communicating results
 - Develop a comprehensive portal where boards activities, local plans and crime statistics and theme-based preventive measures are accessible to support boards exchange of knowledge
- The CO III project was ended as of December 2021 and there is no available project/fund for this recommended action. Part of the recommendation “developing LPSB capacities to raise awareness on civilian oversight of ISFs to oversee the partnership of ISFs and CSOs in the framework of LPSB” is already provided under the project duration for the 19 pilot provinces.

Evaluation recommendation 5. Continue supporting the Grand National Assembly of Turkey to grasp its functions related to civilian oversight.

There is a great potential of the GNAT to carry out parliamentary oversight of the ISFs. In this regard, the FEC recommends amending or rewriting the Rules of Procedures to improve the organizational, technical, research and expert capacity of the GNAT.

The FEC recommends strengthening parliamentary committees to have a legislative approach and ensure that all political parties actively participate in their work. Therefore, there is a need to improve GNAT's legislative drafting capacity and enhance the abilities of members of the committees to increase their participation in the legislative process by holding meetings among themselves and developing technical skills for drafting laws.

Concerning the improvement of the GNAT's legislative performance, the RP can be amended to enable better organizational, research and expert capacities of the MPs and legislative experts in the Parliament. The RP should envisage the implementation of Regulatory Impact Assessment (RIA), Better Regulation Techniques (BRT), Civic Participation or Participation of Civil Society Organizations (CSOs) and Establishment of Liaison Offices

The FEC recommends improving the participatory capacity of the GNAT by enhancing its engagement with the CSOs. The FEC recommends exploring forms to establish a standardized participatory method for CSOs and other organized initiatives to participate in the legislative process. The participation of the CSOs is an indispensable element for the oversight of ISFs, including monitoring of activities and addressing security priorities.

Also, the FEC recommends establishment of auxiliary structures (i.e. liaison offices) for the parliamentary relations with the officials, CSOs and outside experts.

The Project should support a specific Parliament-ISFs Liaison Office related to the ISF oversight to build relations with the security-related public offices.

The FEC recommends improving the Parliamentary Inquiry mechanism and the Inquiry Committees should be given compelling powers, such as sending subpoena and contempt powers, to enable witnesses to appear or submit documents needed to shed light on the subject of inquiry.

The GNAT should work with stakeholders and independent oversight bodies to further strengthen an effective system of ISFs' oversight and strengthen interaction with the national human rights institutions (Human rights and equality institution of Turkey- TIHEK), independent oversight bodies (e.g., Ombudsman office, etc) and benefit from their expertise.

Civilian Oversight Phase III Final Independent Evaluation

Management Response

26.01.2022

Management response: This recommendation is valid and logical, but UNDP will have to reject this recommendation. This is because there is no concrete legal framework in this area and political ownership of GNAT is very limited. Any kind of GNAT related action can only be taken by UNDP if the legal framework regarding this area and ownership of GNAT. If that pre-condition can be fulfilled at political level, UNDP can initiate a project including below actions for GNAT in line with the recommendation for which responsible unit will be the GNAT.

- Put in place a dedicated committee for strengthening civilian oversight and strategy implementation in the GNAT along the lines of COIII
- Set up a pool of ToT expert based on a tight selection process; create a new training curriculum for experts to assist civilian oversight strategy implementation by the GNAT
- Set up a stakeholder cooperation mechanism with Human Rights and Equality Institution of Turkey- TIHEK and independent oversight bodies (e.g. Ombudsman office)

Evaluation recommendation 6. Prepare clear and practical capacity development programme for the main target groups (e.g., the Gendarmerie and Coast Guard Academy and the ISF, district governors, civil society organizations and media)

COIII should continue implementing its systemic approach to capacity development, following needs assessments of the main stakeholders and partners. At the current stage of development of civilian oversight over the ISF, it is important to consider and provide a longer-term and needs-based capacity development assistance.

The FEC recommends continuing support to the Gendarmerie and Coast Guard Academy (GCGA) to become a nationally and internationally recognized higher education institution that educates highly qualified Officers, NCOs and other personnel required by the Gendarmerie and Coast Guard organizations.

The Project should support the GCGA to lay the foundations of Civilian Oversight understanding and establish training programs for ISF. In this context, the Academy should continue training the Gendarmerie and Coast Guard on human rights issues and investigation techniques, the culture of service and prevention of crime, and further elaborate recommendations from the training needs assessment (carried out under the COIII)

Concerning the needs of district governors, civilian oversight course based on applied techniques and a Management of Local Prevention and Security Boards course should be placed in the curriculum. Moreover, it is recommended to internalize concepts such as participation and partnership and present them to the district governors.

The Project should consider the needs of the civil society and media and provide capacity development support to enable them to actively participate and follow up on civilian oversight.

The evaluation team recommends that COIII design a comprehensive training evaluation approach based on the Kirkpatrick model, assessing four levels of learning: 1) participant satisfaction with the training; 2) immediate change in individual knowledge and skills; 3) change in individual performance back in the workplace; and 4) change in the overall performance of the institution.

Management response: UNDP partially accept this recommendation. This is because the project is already prepared curriculums of district governors, ISFs, and GCGA for human centered civilian oversight concept. Despite there are certain developments in GCGA for this adaptation, there is no concrete action taken by the MoI. The training policy and programs can be revised if there is continued political ownership. Establishment of legal framework in this area will reflect political ownership and accelerate application-based integration of the training curriculum recommended by the COIII project.

Key Action	Completion date	Responsible unit(s)	Tracking	Status
			Comments	
6.1 Revised training contents of the GCGA curriculum and ensure integration of civilian oversight related content into the GCGA curriculum	December 2022	GCGA	Revision of GCGA curriculum is already provided in line with UNDP COIII Project. GCGA has courses	Initiated

Civilian Oversight Phase III Final Independent Evaluation
Management Response
26.01.2022

			related with civilian oversight area and within these courses including course on “human rights”, Civilian Oversight contents are integrated horizontally in line with the curriculum provided by the Project. UNDP will follow up whether the curriculum is fully integrated into the GCGA curriculum.	
--	--	--	---	--

Evaluation recommendation 7. Facilitate citizens participation in civilian oversight by enhancing the understanding, awareness and the need for their involvement in security governance

The FEC recommends exploring opportunities to expand activities to enhance understanding of the civilian oversight, especially among citizens through public advocacy activities, public discussions and awareness events.

The role of media and civil society organizations (Recommendation 6) in this process is highly important.

The FEC recommends using social media for informing citizens on rights and processes for civilian oversight. Some of the new platforms such as Tik Tok, Instagram, twitter, twitch, etc could be adjusted to serve the purpose of informing and involving citizens, especially youth, in governance and local policy making activities

Management response: This recommendation is valid and logical, but UNDP will have to reject this recommendation. This is because there is no legal framework regarding the establishment of NCPO and LSPBs, so there is no guarantee that MoI and member agencies of LSPBs (municipality, district governors etc) will continue to organize public discussions and awareness events including social media. There are initiatives started on their own by some of the pilot LSPBs in line with the ownership of the District Governors but since there is no solid legal background regulating functioning and operationalization of the LSPBs, public discussions and awareness events directly attached to this purpose is not fully ensured now at each district level.

Evaluation recommendation 8. Strike a balance between qualitative and quantitative indicators to enable adequate measuring of progress under components, also capturing COIII’s and progress towards its planned results and broader reform agenda.¹

The evaluation consultant recommends that COIII provide a well-balanced combination of qualitative and quantitative indicators to capture changes and results attributable to the Project, using national indicators and targets to the extent possible. The FEC also recommends including gender-sensitive indicators with a focus on “gender transformative results”.

Civilian Oversight Phase III Final Independent Evaluation

Management Response

26.01.2022

Management response: This recommendation is valid and logical, but UNDP will have to reject this recommendation. This is because there is no legal framework regarding the establishment and dissemination of NCPO and LPSBs across Turkey, so this recommendation is considered for future reference. When this legal framework is ensured, UNDP can initiate a project to set action plan targets for LSPBs that is including gender-sensitive indicators with a focus on gender transformative results in line with the recommendation for which responsible unit will be the MoI. Such a project can include below actions for gender-sensitive indicators and gender transformative results.

- Prepare a Theory of Change for the LPSBs and set outcomes and related indicators
- Evaluate/compare the activities of the Boards making use of the indicators
- Review of existing design strategic plan and projects of NCPO and action plans of LSPBs regarding their consistency with gender-sensitive indicators and gender transformative results and providing upgrading
- Capacity building trainings for LSPB members and NCPO staff to set action plan targets including gender-sensitive indicators and gender transformative results