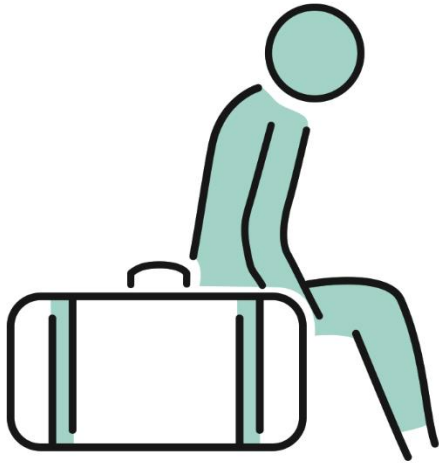




This project is co-funded by the European Union and the Republic of Turkey  
Bu proje Türkiye Cumhuriyeti ve Avrupa Birliği tarafından finanse edilmektedir

# Technical Assistance for the Evaluation of 2014, 2015 and 2016 **Turkey** Annual Programmes

## THEME REPORT



Agriculture



Energy



EU-Turkey Dialogue



Civil Society



Fundamental Rights



Border Surveillance



**Removal Centers**



Judiciary System



Penitentiary System



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<b>Type of report:</b>	<b>Final report</b>
<b>First draft final report submitted on:</b>	8 June 2022
<b>Comments on the first draft final report received on:</b>	7 July 2022
<b>Second draft final report submitted on:</b>	17 July 2022
<b>Comments on the second draft final report received on:</b>	4 August 2022
<b>Final Report submitted on:</b>	15 August 2022

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## PROJECT SYNOPSIS

<b>Project title</b>	Technical Assistance for the Evaluation of 2014, 2015 and 2016 Turkey Annual Programmes EuropeAid/140793/IH/SER/TR
<b>Beneficiary Country</b>	Turkey
<b>Location</b>	Base of operation will be Ankara. The geographical area to be covered is the whole territory of Turkey since the evaluation activities will be organized to the cities where projects are implemented.
<b>Contracting Authority</b>	Central Finance and Contracts Unit (CFCU), Ankara, Turkey.
<b>Responsible Body</b>	The Central Finance and Contracts Unit (CFCU) is the contracting authority of the project. The beneficiary of the project is Directorate for EU Affairs (Department of Monitoring and Evaluation).
<b>Target groups</b>	<ul style="list-style-type: none"><li>▪ NIPAC Office;</li><li>▪ The EC/EUD;</li><li>▪ OSs and LIs of the projects involved at central and local level;</li><li>▪ Decision and policy-makers in the ministries involved;</li><li>▪ Project beneficiaries, end beneficiaries, grant beneficiaries and their co-applicants;</li><li>▪ The Final Beneficiaries of the activities implemented;</li><li>▪ Members of the Evaluation Reference Groups (ERG) including CFCU members;</li><li>▪ Other social partners and CSO representatives.</li></ul>
<b>Commencement date</b>	9 August 2021
<b>Duration</b>	14 months

## ABBREVIATIONS

<b>AD</b>	Action Document
<b>AFAD</b>	Disaster and Emergency Management Presidency
<b>ASAM</b>	Asylum Seekers and Migrants Association
<b>BoQ</b>	Bills of Quantities
<b>CFCU</b>	Central Finance and Contracts Unit of the Ministry of Treasury and Finance of Turkey
<b>CoE</b>	Council of Europe Special Representative on Migration and Refugees
<b>DG NEAR</b>	Directorate General European Neighbourhood and Enlargement Negotiations
<b>DGMM</b>	Directorate General of Migration Management
<b>EC</b>	European Commission
<b>ERG</b>	Evaluation Reference Group
<b>EU</b>	European Union
<b>EUD</b>	European Union Delegation to Turkey
<b>FIDIC</b>	International Federation of Consulting Engineers
<b>FRIT</b>	EU Facility for Refugees in Turkey
<b>FRONTEX</b>	European Border and Coast Guard Agency
<b>ICMPD</b>	International Centre for Migration Policy Development
<b>IL</b>	Intervention Logic
<b>IOM</b>	International Organisation for Migration
<b>IP</b>	International Protection
<b>IPA</b>	Instrument for Pre-accession Assistance
<b>JC</b>	Judgement Criteria
<b>LFIP</b>	Law no. 6458 on Foreigners and International Protection
<b>LI</b>	Lead Institution
<b>MADAD</b>	EU Regional Trust Fund in Response to the Syrian crisis
<b>MoH</b>	Ministry of Health
<b>MoI</b>	Ministry of Interior
<b>MoNE</b>	Ministry of National Education
<b>NIPAC</b>	National IPA Co-ordinator
<b>PDMM</b>	Provincial Directorates of Migration Management
<b>PEC</b>	Public Education Centres
<b>PMM</b>	Presidency of Migration Management
<b>RC</b>	Removal Centres
<b>SuTP</b>	Syrians under Temporary Protection
<b>TA</b>	Technical Assistance
<b>TCG</b>	Turkish Coast Guard
<b>TNP</b>	Turkish National Police
<b>ToR</b>	Terms of Reference
<b>TS</b>	Technical Specifications
<b>UK FCO</b>	Foreign & Commonwealth Office
<b>UNHCR</b>	United Nations High Commissioner for Refugees

## EXECUTIVE SUMMARY

This report focuses on Theme 7 ‘Migration’ and specifically the expected ‘result’ of ‘*Enhanced physical capacities in the migration and asylum sector*’. This is a key result under IPA assistance, with substantial financial assistance in the programming years covered by this evaluation (For the entire migration theme, including Theme 6; 69.3 million EUR EU contribution for the 2014 programme, 125.9 million EUR EU contribution for the 2015 programme, and 92 million EUR EU contribution for the 2016 programme). As discussed by the Annual Action Programmes for the three years, some of the key issues regarding the expected result comprise the need for additional capacity in removal centres and the provision of removal capacity in alignment with European and international standards.

Turning to the selected three Activities covered by this evaluation and looking specifically at the reconstructed intervention logic for the selected Activities, the long-term change or expected impact can be defined as ‘*Migrants benefiting of enhanced physical conditions*’. This will be achieved by improving the physical capacities in the migration and asylum sector (the expected short-/medium-term outcome). The expected outcomes will be achieved on the basis of three ‘Activities’ (or projects) listed below; the three Activities comprise a wide range of activities aiming at ensuring that the required physical facilities are in place and operational. The three selected Activities are:

1. *2014 Activity 1. Refurbishment and Maintenance of Removal Centres*
2. *2015 Activity 1. Construction of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement*
3. *2016 Activity 1. Supply of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement.*

**Relevance:** The selected Activities were fully relevant for the achievement of the specific objective of ‘*enhanced physical capacities in the migration and asylum sector*’ (reconstructed intervention logic). As such, they were clearly aligned with the Turkish migration policy framework and the European Union’s accession policy. The alignment of the selected Activities has been also confirmed in light of the needs of the lead beneficiary and final beneficiaries. Despite challenges encountered during the implementation of the Activities, caused mainly by the COVID-19 pandemic, stakeholders implementing and coordinating the Activities showed a good level of flexibility and understanding, and this facilitated the delivery of outputs and outcomes.

**Coherence:** The selected Activities were fully coherent with other EU interventions and initiatives of key international actors active in the field of migration such as United Nations High Commissioner for Refugees (UNHCR) and International Organisation for Migration (IOM), showing a good level of complementarity and coordination. Building upon previous EU initiatives, most notably projects run under previous IPA programmes, allowed for synergies.

**Effectiveness:** The selected Activities greatly contributed to achieving intended outcomes, namely enhanced physical capacities and conditions for the migrants, both in terms of infrastructure improvements of old Removal Centres (RCs) and increased removal capacity and enhanced conditions as ensured by the construction of new RCs, the latter meeting European and international standards

and addressing different gender and human rights-related needs of migrants. Key data for the three Activities is summarised in the table below.

Activity	Removal Centres	Irregular Migrant Capacity (persons)
<b>A7.1 2014 Activity 1.</b> Refurbishment and Maintenance of Removal Centres	<p><b>1) Refurbished 5 existing RCs with EC funds (Works and Supervision Contracts under Lot1) located in Adana, Aydın, Edirne, Hatay and Van</b></p> <p>2) 6 RCs refurbished by the funds of Turkey and the Supplies (7 Lots) funded by the EC. These are RCs in <b>Ankara, Ağrı, Istanbul, Malatya, Bayburt and Tekirdağ</b>. The first four have been completed, while Bayburt will be completed in June 2022. Tekirdağ has been cancelled.</p>	<p>Total of about 1,400</p> <ul style="list-style-type: none"> <li>• Adana: 80-100</li> <li>• Aydın: 390-400</li> <li>• Edirne: 400</li> <li>• Hatay: 120</li> <li>• Van: 390-400</li> <li>• Ağrı: 400</li> <li>• Istanbul: Container - 1.200, and 3rd Airport - 700</li> <li>• Malatya: 250</li> <li>• Ankara: 500 - 600</li> <li>• Bayburt: 400</li> <li>• Tekirdağ: 400 (cancelled)</li> </ul> <p><b>Total of about 2,300</b> (except for the container)</p>
<b>A7.2 2015 Activity 1.</b> Construction of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement	<b>6 newly constructed RCs, and refurbished through the Supplies (7 Lots)</b>	<ul style="list-style-type: none"> <li>• Adana: 400</li> <li>• Kütahya: 400</li> <li>• Malatya: 400</li> <li>• Niğde: 400</li> <li>• Şanlıurfa: 600</li> <li>• Balıkesir: 200</li> </ul> <p><b>Total: 2,400</b></p>
<b>A7.3 2016 Activity 1.</b> Supply of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement	<b>6 newly constructed RCs, and refurbished through the Supplies (7 Lots)</b>	<ul style="list-style-type: none"> <li>• Adana: 400</li> <li>• Kütahya: 400</li> <li>• Malatya: 400</li> <li>• Niğde: 400</li> <li>• Şanlıurfa: 600</li> <li>• Balıkesir: 200</li> </ul> <p><b>Total: 2,400</b></p>

However, the selected Activities have been affected by several factors, the COVID-19 pandemic being the most notable and unexpected one, causing significant delays in the implementation of the 2015 and 2016 Activities. The time gaps between programming and contracting and failure to fully synchronise between the layout and design of the construction of the new RCs have been important constraints. Moreover, the choice of land was not ideal for constructing RCs with the scale identified in the Technical Specifications (TSs).

The implementation modality that was used, i.e., construction, supply and supervision, was fully adequate. Moreover, the achievement of outcomes was supported by establishing robust criteria for the selection of candidates and having qualified experts with international experiences for the supervision. On the other hand, longer inception periods and more resources for the preparation of the design and the Bill of Quantities (BoQ) followed by timely implementation without major delays would be adequate alternative modalities.



**Efficiency:** There have been efficiency issues related mostly to the programming, contracting and implementation of the selected Activities, however, on the whole, the expected results were generated in good quality. Reporting and monitoring practices were well established, allowing for a good follow up on the progress made towards the intended outcomes and timely identification of possible risks. Moreover, overall coordination was efficient/effective, however, there were coordination issues between the Presidency of Migration Management (PMM), provincial directorates and RC management.

**Impact:** The selected Activities have already made significant contributions to the wider objective of *'Migrants benefiting of enhanced physical conditions'*, mainly by enhancing the infrastructure and equipment of the 'old' RCs and the construction of new RCs in alignment with international and European standards, and in consideration of specific needs of migrants arriving to Turkey, such as disabled people, children, or women. Continuous efforts are required in terms of adequate management of the RCs and regular revisions of their conditions for achieving and maintaining the long-term changes.

**Sustainability:** Prospects for sustainability are good, especially if the lead beneficiary ensures the regular review and refurbishment of the infrastructure/equipment in the old RCs and adequate management/capacity development at all RCs.

Intense usage of the RCs e.g., in case of seasonal overcrowding, incorrect use of the infrastructure and equipment by RC staff and/or detainees, poor management and lack of qualified staff are the main risks regarding the sustainability of the selected Activities.

**Added value:** The selected Activities have demonstrated strong added value, with stakeholders acknowledging that similar results would not have been possible without EU support. Indeed, the quality and physical conditions of RCs supported by the EU are significantly better than those built without EU support. This is partially explained by the fact that the new RCs are purpose-built (the old RCs were often conceived as accommodation centres). The quality of RCs that were refurbished was increased but they still faced problems given that their original purpose was different (accommodation centres). In addition, EU support not only provided experience that can now be replicated in future initiatives, but also raised awareness on human rights and gender considerations.

**Conclusions, lessons learnt and recommendations:** The selected Activities demonstrated a strong performance in light of the evaluation criteria. Most importantly, looking at the reconstructed theory of change, the selected Activities greatly contributed to achieving the intended outcomes, namely enhanced physical capacities and conditions for the migrants.

Key **lessons learnt** include:

- A certain degree of **flexibility** in the design of the RCs is necessary to allow for an adequate adaptation to the specific conditions and needs in each location.
- **Cooperation with international actors** active in the migration sector is key for ensuring not only the coherence between activities but also their complementarity.

- Mere infrastructure improvements are not sufficient for meeting all the EU and international standards. Provision of adequate information, children's access to education, having measures in place for meeting the special needs of disabled people and women with children, provision of psychosocial and legal support and avoiding overcrowding in the RCs are key factors for ensuring that **human rights and gender-based needs are met**.
- **In-person site visits** by the main stakeholders, i.e., Ministry of Interior (Mol), PMM, and Central Finance and Contracts Unit of the Ministry of Treasury and Finance of Turkey (CFCU) before the contracting phase were effective in terms of identifying possibilities for improvements.
- **Longer inception periods** are necessary for an adequate identification of all needs related to the construction and supplies for RCs.
- The programming and preparation of the BoQ should be followed by **timely implementation** to avoid changes in needs because of the long gap between programming and implementation.

Finally, **recommendations** include:

- Staff at the RCs should be given adequate training on how to treat and manage people that might have suffered traumatic events. Further capacity building for RCs staff aimed at developing awareness of international standards would be equally advisable, e.g., in the form of a workshop for all RC managers and experts.
- The design of the RCs should pay more attention and give priority to facilities and equipment for children to ensure that their rights are adequately met during their stay at RCs.
- Adapt the visiting hours for RCs in a way that facilitates access of lawyers and CSOs to migrants.
- Include tools and materials that will support the provision of the psychosocial support into the lots for future supplies.
- Ensure adequate and sufficient space for outdoor and sport activities, taking into consideration the potential increase in the number of migrants arriving to Turkey in the future.
- Enhance communication aimed at the local population through awareness raising events/campaigns.
- Ensure timely programming and contracting. At the same time, the needs analysis (underlying the programming) should be regularly updated in the time before the contracting is completed, thus allowing to consider and adapt to changing conditions.
- Ensure an adequate synchronisation of the construction/infrastructure of the RCs and related Technical Specifications for the supplies to avoid corrections and related additional expenses.
- Ensure regular revision of the infrastructure of the RCs and regular procurement of adequate equipment and materials to sustain the key services.
- Ensure adequate and sufficient allocation of budget to/and staff in the RCs to maintain the physical conditions and smooth management of the RCs, particularly during periods of high migrant influx.
- Consider the replacement of the spare parts in the BoQ during its preparation to ensure adequate maintenance of the installed equipment. Spare parts can be procured together with the original items to allow for an immediate replacement and repair if needed.

# 1 INTRODUCTION

## 1.1 Objectives and scope of the evaluation


This Evaluation Report covers Theme 7 Actions under the Instrument for Pre-Accession Assistance (IPA) II for the Home Affairs sub-sector under the sector for Rule of Law and Fundamental Rights. It is submitted in accordance with the Terms of Reference (ToR) as one of the main outputs of the Technical Assistance for the Evaluation of 2014, 2015 and 2016 Turkey Annual Programmes.

The overall evaluation, consisting of nine thematic evaluations, is designed to “improve the strategic link between the planning, programming, monitoring and evaluation activities of National IPA Coordinator (NIPAC) office”. This purpose is approached as a key contribution to the overall objective “improved overall management of IPA assistance in Turkey”.

This thematic evaluation is focused on a selection of IPA activities, more exactly, three Activities funded by IPA 2014, 2015 and 2016.

**Note on terminology used:** The IPA Action Annual Programmes use the term “Activity” for the support provided, each Activity consisting of one or more contracts. Whilst this report mostly uses the term “Activity” at times we also use the more generic term “intervention” which is largely used in the evaluation practice not only in IPA but in all European Union (EU) funding programmes. With regard to specific contracts we will also refer to the term “project”.

*Table 1 Basic data on the evaluated interventions*

Code	No. of contracts	Sector/Theme/ Intervention	Start date	End date	Allocated (EUR)	Contracted (EUR)	Disbursed (EUR)
	23	<b>Theme 7 - EVALUATION OF IPA II ACTIONS FOR ESTABLISHMENT OF REMOVAL CENTRES IN TURKEY</b>			52,130,000.00	40,438,222	37,167,807
A7.1	9	2014 Activity 1. Refurbishment and Maintenance of Removal Centres	December 2018	December 2022	10,000,000.00	7,911,146.997.991.757	6,950,487.75
Contract 7.1.1		Supply (7 lots)					
Contract 7.1.2		Works					
Contract 7.1.3		Supervision					
A7.2	7	2015 Activity 1. Construction of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement	March 2019	February 2022	40,000,000.00	31,580,492.6	27,859,649.65
Contract 7.2.1		Works (6 lots)					
Contract 7.2.2		Supervision (Service)					

A7.3	7	2016 Activity 1. Supply of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement	October 2020	October 2022	2,130,000.00	2,122,076.49 TR: 318,311 € EU: 1,803,765 €	1,697,661.26
Contract A7.3.1	Supply (7 lots)						

## 1.2 Structure of the report

Besides the introductory description of the objectives and scope of interventions under the evaluation in Chapter 2, a short summary of methodology and description of tools and instruments applied during the evaluation is given in Chapter 3. Chapter 4 includes the main findings structured along the originally proposed evaluation questions. The final Chapter 5 summarises conclusions and respective recommendations resulting from overall findings. All details concerning the intervention logic, methodology, implementation of individual interventions – activities and outputs, data collected from surveys and other sources are presented in the Annexes to the report.

## 1.3 Evaluation questions, approaches and methods

The list of evaluation questions was originally determined in the ToR, and specific judgment criteria for each question were adopted according to the needs and type of the interventions. Therefore, the initial evaluability assessment took place during the inception phase of the assignment. Its purpose was to ensure that the methodology is suitable for the selected Activities. The suggested methods and tools were based on the reconstructed intervention logic. The purpose of this exercise was to focus the original scope of the IPA II support and its intervention logic to the Activities selected for the evaluation.

The intervention logic at the level of the theme, comprising all the Activities included in the evaluation, was primarily analysed based on the information from the programming documents. The provision of additional information and data enabled the preparation of the reconstructed intervention logic, and this was subsequently discussed with the members of the Evaluation Reference Group (ERG) for further adjustment. The model includes inputs, activities, outputs, outcomes and impacts, together with the contextual factors, and assumptions (see Annex 1).

The evaluability assessment followed the originally determined evaluation questions (all descriptive) and was complemented by the more specific judgement criteria (JC) to reflect the theme-specific issues. The appropriate indicators, tools and/or methods were selected depending on their feasibility, available resources and data and assumptions concerning the accessibility of relevant stakeholders. Triangulation of sources or methods was considered to ensure data validity. The proposed evaluation approach in the matrix considered the risks and limitations identified from the documents, which were provided at the inception stage. The evaluation matrix provides a summary of the proposed tools based on the available data, information, and details, and identifies relevant stakeholders for the application of the selected tools (see Annex 2). Within the main findings of this report (chapter 5), references to the relevant JCs are made throughout the analysis. This allows the reader to see how the matrix has been used to construct the evaluation and ensures that no evidence gaps emerge.

#### 1.4 Description of the evaluation activities

As for the methodology, the initial desk review of available documentation gathered secondary data from the provided documents and other available sources. Further data collection methods dealt mainly with the primary data, which were gathered through semi-structured interviews. The interviews were conducted with all relevant stakeholders starting with the Lead Institution, PMM, contractors, NIPAC staff responsible for the theme, the Central Finance and Contracts Unit (CFCU), and the European Union Delegation to Turkey (EUD).

The analytical methods were based on the theory of change and included analyses of stakeholders as well as inputs, outputs, identified indicators, internal/external factors, and compared planned versus achieved milestones, targets, and deadlines. The original theory of change was adapted, and its revised version was agreed with the ERG to better correspond with the Activities selected for the evaluation. The availability of the data at the national level enabled to identify some trends for outcome indicators. Both, qualitative and quantitative data were thus utilised.

## 2 PROBLEMS ENCOUNTERED, SOLUTIONS AND LIMITATIONS

Only two minor problems, and with limited impact on the evaluation, were encountered. As already noted in the context of the inception phase/inception report, relevant documentation/reports on the selected Activities were not readily available at the outset of the evaluation, and this somewhat delayed the data collection efforts (mitigated by extending the duration of the data collection effort). Moreover, the review of the documentation/reports found that monitoring on the basis of indicators corresponded mostly to the level of activities/outputs, with less systematic/comprehensive monitoring of outcomes. Stakeholders demonstrated good awareness of this issue, and weaknesses in this area were explained with resource issues (limited time to dedicate to the design of monitoring systems and corresponding data collection during implementation). Whilst the assessment was somewhat constrained by the absence of systematic monitoring data, this was largely mitigated by extensive data derived from interviews.

### 3 PRESENTATION OF THE THEMATIC EVALUATION CONTEXT

This report focuses on Theme 7 ‘Migration’ and specifically the expected ‘result’ of ‘*Enhanced physical capacities in the migration and asylum sector*’. This is a key result under IPA assistance, with substantial financial assistance in the programming years covered by this evaluation (For the Home Affairs sub-sector (including theme 6): 69.3 million EUR EU contribution for the 2014 programme, 125.9 million EUR EU contribution for the 2015 programme, and 92 million EUR EU contribution for the 2016 programme). As discussed by the Annual Action Programmes for the three years, some of the key issues regarding the expected result comprise the need for additional capacity in removal centres (RC) and the provision of removal capacity in alignment with European and international standards.

Turning to the selected three Activities covered by this evaluation and looking specifically at the reconstructed intervention logic for the selected Activities, the long-term change or expected impact can be defined as ‘*Migrants benefiting of enhanced physical conditions*’. This will be achieved by improving the physical capacities in the migration and asylum sector (the expected short-/medium-term outcome).

The expected outcomes will be achieved on the basis of three ‘Activities’ (or projects) - listed below; the three Activities comprise a wide range of activities aiming at ensuring that the required physical facilities are in place and operational. The three selected Activities are:

1. *2014 Activity 1. Refurbishment and Maintenance of Removal Centres*
  - a. *Supply (Ankara, Ağrı, Bayburt, Istanbul, Malatya, and Tekirdağ (cancelled))<sup>1</sup>*
  - b. *Refurbishment (Adana, Aydın, Edirne, Hatay, and Van)*
2. *2015 Activity 1. Construction of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement (Adana, Balıkesir, Kütahya, Malatya, Niğde, and Sanliurfa)*
3. *2016 Activity 1. Supply of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement (Adana, Balıkesir, Kütahya, Malatya, Niğde, and Sanliurfa).*

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<sup>1</sup> Recently, the CFCU and PMM agreed, with NIPAC’s approval, that the Tekirdağ component should be replaced with İstanbul Binkılıç RC.

## 4 FINDINGS OF THE EVALUATION BY THE EVALUATION QUESTION

### 4.1 Relevance

**Q1. To what extent are the activities implemented relevant for achieving the specific objectives of the Activity/Theme (Enhanced physical capacities in the migration and asylum sector)?**

The selected Activities were fully relevant for the achievement of the specific objective of ‘*enhanced physical capacities in the migration and asylum sector*’ (reconstructed intervention logic). As such, they were clearly aligned with the Turkish migration policy framework and the EU’s accession policy. The alignment of the selected Activities has also been confirmed in light of the needs of the lead beneficiary and final beneficiaries. Despite challenges encountered during the implementation of the Activities, caused, inter alia, by the COVID-19 pandemic, stakeholders implementing and coordinating the Activities showed a good level of flexibility and understanding, and this facilitated the delivery of outputs and outcomes.

#### JC1.1. Alignment of selected Activities with TR policy framework

Activities under Theme 7 are clearly aligned with Turkey’s policy framework and will contribute to **Turkey’s overall migration management, specifically the management of irregular migration.**

The Activities speak to Turkey’s **wider policy framework** namely the **10<sup>th</sup> and 11<sup>th</sup> Development Plans** which outline a long-term development vision and main priorities for the 2014-2018 and 2019-2023 periods respectively. Similarly, the Activities are also aligned with and will contribute to operationalising the **2019-2023 Strategic Plan of the Ministry of Interior**. Turkey adopted in 2005 the National Action Plan for Asylum and Migration, endorsing all actions to be realised for aligning asylum and migration policy and practice with EU standards. In the meantime, two thematic national policy documents have also been adopted: The **Irregular Migration Strategy Document and National Action Plan** (2015-2018) and **Turkey’s Harmonisation Strategy Document and National Action Plan** (2019-2023). The updated **Irregular Migration Strategy and Action Plan** for 2021-2025 is currently in place. The prioritised Strategies on Combating Irregular Migration are as follows:

- Country of origin, transit and destination should find common ground and issue necessary legal reforms,
- Ensure coordination between all relevant units of country working within this field directly or indirectly and all national and international institutions,
- Take all necessary measures improving border security,
- Make necessary arrangements in the fields of work and minimise illegal employment,
- Accelerate the process of migrants on acquiring status,
- Strengthen the measures on combating organised crimes such as smuggling of migrants,
- Determine the severe sanctions against those who transport irregular migrants,
- Investigate the reasons why persons migrate from the country of origin and develop projects for overcoming these problems.

Activities are also relevant for the implementation of the **existing legal framework**, namely **Law no. 6458 on Foreigners and International Protection (LFIP)**, adopted in April 2013 and aiming to establish procedures for the entry, stay and exit of foreigners from Turkey and to determine the scope of



international protection. The Activities also speak to **Regulation no. 28980 from April 2014 on Establishment of Reception and Accommodation Centres and Removal Centres**, one of the key regulatory documents concerning international protection in Turkey.

Finally, Activities are strongly aligned with Turkey's **National Action Plan for EU Accession Phase 1 and Phase 2** and its target of 'increasing the capacity of removal centres where irregular migrants may be placed in line with humanitarian standards under administrative detention pending removal'.

#### JC1.2. Alignment of selected Activities with EU accession policy framework

Similarly, the selected Activities are well aligned with the **EU accession policy framework**, namely with **Chapter 24 on 'Justice, Freedom and Security'**, including requirements on standards and legislation in the field of migration. Activities also strongly speak to the **EU-Turkey readmission agreement** and the **Visa Liberalisation Roadmap** that includes specific requirements Turkey needs to meet in its migration policies. Moreover, Activities clearly speak to the European Agenda on Migration,<sup>2</sup> and, in terms of alignment with EU acquis, to the EU Returns Directive.

As indicated in the 'Migration and Asylum Sub-Sector Review and Gaps Assessment Report' prepared for the EUD in November 2020, the LFIP is highly comprehensive and closely aligned with the EU Acquis. Most recently, the amendment to the LFIP in 2019 stipulated seven foreseen 'Alternatives to Detention' to further enhance compliance with international and European standards.

Moreover, the three Activities also specifically address the areas of improvement identified by the European Commission's (EC) **Turkey Reports**, e.g., the need to improve the management of the RCs: '*Turkey needs to further align its practice with European standards in RCs, in particular with regard to protection of human rights, including access to legal counselling and interpreters and protection of vulnerable groups, in particular children staying with their families*'.

Finally, the Activities clearly respond to the needs identified in **the IPA II Annual Action programmes**, most notably the need '*to enhance the capacity for the removal of irregular migrants*'. The Activities will contribute to the overall enhancement of migration management in Turkey by contributing to the RCs' compliance with EU and international standards. This is especially important considering the fact that the **EU-Turkey readmission agreement** and accession of Turkey to the EU are expected to further increase the migration influx to the country.

#### JC1.3. Alignment of selected Activities with needs of lead beneficiary

Activities are clearly **aligned with the needs of the lead beneficiary**, namely the Presidency of Migration Management (PMM) in charge of implementing migration policy and coordinating migration issues. The PMM was first established in 2014 as the Directorate General of Migration Management (DGMM) as per the LFIP. With the 'Presidential Decree on the Amendment of Some Presidential Decrees No. 85 published in the Official Gazette dated 29/10/2021 and numbered 31643', the status

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<sup>2</sup> See European Commission (2015) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – A European Agenda on Migration, COM(2015) 240 final.

of the institution has been changed to 'Presidency', namely the Presidency of Migration Management of the MoI.

Activities met the needs in terms of the lead beneficiary experiencing **institutional changes**. Indeed, the PMM, took over the reception centres and RCs from Turkey's National Police in 2014, the same year the PMM became operational. Migration management was a new area of expertise and the overall migration management capacity of the PMM was limited. In 2018, a specific Department for Combating Irregular Migration was established under this institution to develop and implement measures for this purpose.

It was acknowledged that **technical, infrastructure and management support** were required to implement the existing migration policy. Support in these areas was considered to be a major need during the 2014, 2015 and 2016 programming years when political developments further exacerbated the influx of migrants to Turkey, whilst the existing infrastructure was inadequate.

Most of the detention and/or RCs which Turkey's National Police handed over to the PMM in 2014 were relatively old buildings as evidenced in the RCs at Adana, Aydın, Edirne, Hatay and Van, before their refurbishment started under the 2014 Activity. Moreover, these buildings were not appropriate to function as RCs. For example, the buildings lacked separate blocks for men and women, and rooms for disabled people and children. Moreover, facilities for legal consultancy and communication were inadequate, and so were safety measures etc. Finally, to complete information on the wider context, IPA I supported the construction of seven RCs (originally two RCs and seven reception centres). The design of these RCs was elaborated through separate technical assistance with expertise on migration (i.e., not only engineering) and feedback from study visits to Member States, and this resulted in detailed design briefs which have set an example as to standards at RCs.

Considering the increasing irregular migration trend, reaching 454,662 irregular migrants in 2019 (before the pandemic) and 162,996 in 2021, as compared to 58,647 in 2014, the need for increasing the total capacity of the RCs was emphasised in the 2015 Action Document. It was then decided to construct new RCs both with national and EU funds, aiming to increase the capacity for detention and to provide removal services in line with EU and international standards. The overcrowding of the RCs, e.g., in 2019 with 454,662 irregular migrants, justified the decision of constructing new RCs not only in border provinces but also on the migration routes, particularly towards Greece, Bulgaria and Romania. The total capacity of the RCs is set to progressively reach 20,000 (the current capacity is about 16,000 for a total of 27 RCs). The scale, location, and Technical Specifications (TS) of the new RCs to be constructed and their supply needs were identified accordingly.

It was decided to construct six new RCs with national funds (Ankara, Ağrı, Bayburt, Istanbul, Malatya, and Tekirdağ),<sup>3</sup> and six new RCs with EU funds (Adana, Balıkesir, Kütahya, Malatya, Niğde, and Şanlıurfa) with a total capacity of 2,400 (2015 Activity). The land allocated by the province governorates following the construction design did not always satisfy the architectural and technical specifications included in the BoQ and scales of the RCs identified. For example, the capacity of the Balıkesir RC had

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<sup>3</sup> Recently, the CFCU and PMM agreed, with NIPAC's approval, that the Tekirdağ component should be replaced with Istanbul Binkılıç RC.

to be decreased from 400 to 200, and Adana RC is located very closely to a private manufacturing building and has inadequate room for vehicles.

It was acknowledged that without the EU funds and support, no RCs with such quality standards could have been built. This is due mainly to the **lack of expertise and funding**. Furthermore, the newly constructed RCs will serve as a benchmark and an example of good practices which can be followed by national initiatives in the future.

Finally, to complete the information on the wider context, in 2019 before the pandemic and afterwards in 2021, respectively, the country of origin of irregular migrants was mostly Afghanistan (201,437 and 70,252), Pakistan (71,645 and 16,133), Syria (55,236 and 23,469), and Iraq (12,097 and 4,408), and more recently irregular migration from other countries in Asia and Africa has been observed. Most of the Syrian migrants have a special status, i.e., **Syrians under Temporary Protection (SuTP)**. However, those SuTPs, who break the law or seek **International Protection (IP)**, lose their status, and become irregular migrants and are detained according to their causes of detention.

#### JC1.4. Alignment of selected Activities with needs of other stakeholders/final beneficiaries

In the programming years 2014, 2015 and 2016, the **capacity of the existing RCs was insufficient** considering the actual number of irregular migrants arriving in Turkey and the **inadequate physical conditions** of the existing RCs. For a swift and orderly management of the process and procedures related to the readmission of irregular migrants to their countries of origin or to obtain the status of international protection, the irregular migrants should be hosted in RCs.

The 2014 Activity supported the refurbishment and supply of existing RCs that were funded with national funds but presented inadequate physical conditions. Many of the new RCs constructed and equipped under the 2015 and 2016 Activities are situated in provinces characterised by a high number of migrants given their proximity to the borders and migration routes but without any RC in place, e.g., Şanlıurfa or Kütahya. Interventions to improve the current RCs and build new ones thus not only **increased the removal capacities** but also **improved the conditions in the RCs with a view to align them with EU and international standards**.

The RCs now offer a healthier and safer environment. In case of the six newly constructed RCs, stakeholders highlighted the 'more humane' aspect of the RCs, noting they should **better meet the needs of detainees** considering some of the new features such as migrant admission and registration units, housing units differentiated by gender and family status, multi-purpose halls, communication rooms, technical units and security. In addition, the managers of the RCs acknowledged that the staff working in these RCs had developed a solid understanding of relevant international standards as part of a 2019 project ('Supporting the Capacities of Removal Centres and Fostering Alternatives to Administrative Detention'), funded by the EU and jointly implemented by the International Organisation for Migration (IOM) and the United Nations High Commissioner for Refugees (UNHCR) (for further detail on this, see the 'Coherence' section). Indeed, this project focused on health, safety, security, provision of information, legal aid and consultancy and gender-based needs.

#### JC1.5. The extent of flexibility of selected Activities to respond to changing needs/COVID-19 pandemic

The outbreak of the COVID-19 pandemic in March 2020 severely affected the implementation of some of the activities. This mainly concerned the 2015 and 2016 Activities which suffered **significant delays** caused by full or partial lockdowns resulting in reduced availability of labour and construction materials. Stakeholders noted frequent **interruptions in construction and in procurement of materials and equipment**, with the interruptions being lengthier than usual (the length of the procurement doubled and, in some cases, even tripled compared to the usual length of procurement). The 2014 Activity was completed before the start of the pandemic and no specific design revisions were therefore required (except for Tekirdağ which was cancelled and Bayburt whose construction is ongoing as of June 2022).

The 2015 and 2016 Activities **flexibly responded to the changing needs** caused by the COVID-19 pandemic. This mainly involved measures such as **contract extensions**, issuance of **variation orders** in line with the International Federation of Consulting Engineers (FIDIC) standards and the **cancellation of some of the site visits**, even though not all visits were cancelled, e.g., the EUD continued organising visits throughout the pandemic and especially during 2021. Note that COVID-19 related delays were only one factor among the many serious reasons for the contract extensions and amendments for the 2015 Activities (see the section on efficiency below).

Stakeholders also highlighted the **efforts of the Supervisor, PMM, CFCU and EUD** to understand the challenges caused by the pandemic which greatly facilitated their resolution.

## 4.2 Coherence

### ***Q2. To what extent is the EU assistance coherent with interventions by other international actors and with other EU interventions in related fields?***

The selected Activities are coherent with other EU interventions and initiatives of key international actors active in the field of migration such as United Nations High Commissioner for Refugees (UNHCR) and IOM, showing a good level of complementarity and coordination. Building upon previous EU initiatives, most notably projects run under previous IPA programmes, allowed for synergies.

Initially only for SuTPs, now including also **International Protection (IP)** applicants and status holders, the EU Facility for Refugees in Turkey (FRIT) is a key financial tool in the migration sector. With a total budget of EUR 6 billion, FRIT focuses on humanitarian assistance, education, migration management, health, municipal infrastructure, and socio-economic support. However, there is only a minor level of complementarity between the Activities and FRIT/MADAD interventions. Indeed, the latter focused mainly on PSS support services in addition to the primary health care consultations delivered to the detainees at the RCs and the COVID-19 vaccination and health care provided at the RCs.

No specific synergy has been identified with the programme under the EU Regional Trust Fund in Response to the Syrian Crisis (EUTF) established to support both Syrian refugees and host communities, and this is fully in line with expectations. Indeed, the main target group of RC-related projects are irregular migrants, neither SuTP nor host community. Syrians whose temporary protection status is cancelled/and are placed in RCs is an exception.

### JC2.1. Alignment of the objectives/outcomes of the selected Activities with those of other relevant EU policies and funding programmes

The Activities complemented and built upon earlier EU initiatives in this sector, e.g., the project **'Construction of Reception and Removal Centres'** under IPA 2007 and the grant project on **'Support to the Implementation of the EU-Turkey Statement of 18 March 2016'**. Moreover, under Theme 7 additional complementary activities such as **capacity development and awareness raising** were organised but not included in the scope of this evaluation. As such, the Activities were well aligned with previous initiatives and synergies were created.

Under the IPA I funded Action 'Establishment of Reception and Removal Centres', seven RCs, each with a capacity of 750 people, were built between 2012 and 2016 in Erzurum-Aşkale (2), Gaziantep-Oğuzeli, Van-Kurubaş, Kayseri-Kocasinan, İzmir-Harmandalı, Kırklareli-Pehlivanköy. The experience and lessons learnt through these projects contributed to designing the six new RCs constructed under IPA II.

Moreover, synergies were created with other EU-funded projects implemented by external actors. A new **EU-funded project 'IPA/2020/417-955: Supporting DGMM in the Management, Reception, and Hosting of Irregular Migrants'** (grant to PMM, covering support to the operation of RCs, i.e. personnel, provision of psycho-social support, maintenance and renovation of RC's, provision of basic consumables required by irregular migrants) will complement the construction, supervision and supply with activities aimed at the effective management of RCs. The EU-funded IOM-UNHCR **project 'Supporting Removal Centres' Capacities and Fostering Alternatives to Administrative Detention'** focuses on further improving the RCs' compliance with European and international standards.

Synergies were also noted with the EU-funded **UNHCR project 'TR2014/RL/07/M3-01/001: Strengthening the Capacity of Bar Associations and Lawyers on European Human Rights Standards'** focusing on capacity building of the Bar Associations. Through this project, refugees can apply to the Bar Associations for **legal aid** which will be free of charge, with costs covered by the action. Under this project, **'Legal Clinics'** were established in five provinces, namely in Şanlıurfa, Hatay, Kilis, Malatya and Gaziantep. In 2021, the number of beneficiaries of the Legal Clinics amounted to some 5,244 people and the number of **legal consultancy services** in terms of allocation of lawyers to 3,953. There are services available in 32 provinces providing **information on human rights** targeting migrants having temporary or international protection. During the field visit for this evaluation, project-related information leaflets were noticed on the walls of the RCs informing about the possibility of accessing **legal aid**.

#### JC2.2. Alignment of the objectives/outcomes of the selected Activities with those of other relevant international interventions

Cooperation with international actors was confirmed by several stakeholders. The UNHCR is one of the entities entitled to meet detainees at RCs and provides services that are complementary to the selected Activities, e.g., legal aid, protection issues and access to information by detainees. In this context, a **bilateral agreement between UNHCR and PMM** was signed. UNHCR also provided the PMM **with technical assistance on vulnerability assessment**, working together with the Ombudsman Institution. Another strong implementing partner of the PMM has been the International Centre for Migration Policy Development (ICMPD) having support by 17 Member States.

The Norway and UK FCO funded project **'Development of Turkey's Strategy and Action Plan on Irregular Migration, Supporting Its Work'** implemented by the IOM between July 2012 and January

2015 was the first project directly focusing on irregular migration management. Works on the design and implementation of comprehensive evidence-based irregular migration policies were developed.

The UK FCO funded project for **‘Implementation of Irregular Migration Strategy Document and National Action Plan Focused on Mixed Migration Flows’** implemented by the IOM in July 2015 – October 2016 contributed to establishing the human rights standards in the RCs. Furthermore, close to 20 projects funded by the UK FCO through bi-lateral cooperation and implemented by ICMPD, IOM and CoE have developed capacity of the PMM and raised awareness on international procedures and practices of irregular migration considering the human rights particularly of vulnerable groups such as Human Trafficking, Assisted Voluntary Return, National Asylum Procedures. The most recent of them supported PMM to **‘Strengthen the Capacity of Removal Centres within the Framework of International Human Rights Standards - PHASE II’** started in April 2019 and ended March 2022 has presented a strong synergy to facilitate the achievement of the objectives of the RC investment projects subject to evaluation.

Another recently completed project funded by MATRA has contributed to new approaches for irregular migration management by developing an understanding of alternatives to administrative detention, which would reduce the overcrowding at the RCs.

**4.3 Effectiveness**

**Q3. To what extent are the specific objectives and expected results of the Activity/Theme achieved (Enhanced physical capacities in the migration and asylum sector/Migrants benefiting of enhanced physical conditions)?**

The selected Activities greatly contributed to achieving intended outcomes, namely enhanced physical capacities and conditions for the migrants, both in terms of infrastructure improvements of old RCs and increased removal capacity and enhanced conditions as ensured by the construction of new RCs, the latter meeting European and international standards and addressing different gender and human rights-related needs of migrants.

Activity	Removal Centres	Irregular Migrant Capacity (persons)
<b>A7.1 2014 Activity 1.</b> Refurbishment and	<b>1) Refurbished 5 existing RCs with EC funds (Works and Supervision Contracts under Lot1) located in Adana, Aydın, Edirne, Hatay and Van</b>	<ul style="list-style-type: none"> <li>Adana: 80-100</li> <li>Aydın: 390-400</li> <li>Edirne: 400</li> <li>Hatay: 120</li> <li>Van: 390-400</li> </ul> <p style="text-align: right;"><b>Total of about 1,400</b></p>
Maintenance of Removal Centres	2) 6 RCs refurbished by the funds of Turkey and the Supplies (7 Lots) funded by the EC. These are RCs in <b>Ankara, Ağrı, Istanbul, Malatya, Bayburt and Tekirdağ.</b> <sup>4</sup> The first four have been completed, while Bayburt	<ul style="list-style-type: none"> <li>Ağrı: 400</li> <li>Istanbul: Container – 1,200, and 3<sup>rd</sup> Airport - 700</li> <li>Malatya: 250</li> <li>Ankara: 500 - 600</li> <li>Bayburt: 400</li> </ul>

<sup>4</sup> Recently, the CFCU and PMM agreed, with NIPAC’s approval, that the Tekirdağ component should be replaced with Istanbul Binkılıç RC.

	will be completed in June 2022. Tekirdağ has been cancelled.	<ul style="list-style-type: none"> <li>• Tekirdağ: 400 (cancelled)<sup>5</sup></li> </ul> <p style="text-align: right;"><b>Total of about 2,300</b> (except for the container)</p>
<b>A7.2 2015</b> <b>Activity 1.</b> Construction of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement	<b>6 newly constructed RCs, and refurbished through the Supplies (7 Lots)</b>	<ul style="list-style-type: none"> <li>• Adana: 400</li> <li>• Kütahya: 400</li> <li>• Malatya: 400</li> <li>• Niğde: 400</li> <li>• Şanlıurfa: 600</li> <li>• Balıkesir: 200</li> </ul> <p style="text-align: right;"><b>Total: 2,400</b></p>
<b>A7.3 2016</b> <b>Activity 1.</b> Supply of Removal Centres for the Effective Implementation of the EU – Turkey Readmission Agreement	<b>6 newly constructed RCs, and refurbished through the Supplies (7 Lots)</b>	<ul style="list-style-type: none"> <li>• Adana: 400</li> <li>• Kütahya: 400</li> <li>• Malatya: 400</li> <li>• Niğde: 400</li> <li>• Şanlıurfa: 600</li> <li>• Balıkesir: 200</li> </ul> <p style="text-align: right;"><b>Total: 2,400</b></p>

### JC3.1. The extent to which progress under the selected Activities has been achieved and targets met/outputs produced

Regarding the **2014 Activity**, all the envisaged outputs concerning the refurbishment of the five centres constructed by national funds situated in Adana, Aydın, Edirne, Hatay, and Van were delivered as planned. During the defect notification period, which was preceded by the preliminary acceptance, several corrections were made which contributed to a smooth final acceptance. The CFCU and PMM noted that all outputs were delivered in adequate quality, and this was also acknowledged in the Supervision Reports. However, the provision of supplies under the 2014 Activity as foreseen for RCs in Ankara, Ağrı, Bayburt, Istanbul, Malatya, and Tekirdağ,<sup>6</sup> all funded from national funds, experienced some difficulties. This was mainly due to the cancellation of the construction of the Tekirdağ RC.<sup>7</sup> The supplies corresponding to this RC will be re-allocated to the Istanbul Binkılıç RC supported by national funds. Moreover, the ongoing construction works of the Bayburt RC impeded the provision of supplies.

For the **2015 Activity** outputs were delivered in line with all technical specifications and FIDIC rules. The delivery of the 2015 Activity outputs has been reported as almost complete despite delays and difficulties caused by the COVID-19 pandemic, and changes in the Bill of Quantities and budget (further to an addendum). Already five out of six RCs were handed over, namely Adana, Balıkesir, Kütahya, Niğde and Şanlıurfa. Outputs for the remaining RC in Malatya were delayed due to severe cold weather

<sup>5</sup> Recently, the CFCU and PMM agreed, with NIPAC's approval, that the Tekirdağ component should be replaced with Istanbul Binkılıç RC.

<sup>6</sup> Recently, the CFCU and PMM agreed, with NIPAC's approval, that the Tekirdağ component should be replaced with Istanbul Binkılıç RC.

<sup>7</sup> Recently, the CFCU and PMM agreed, with NIPAC's approval, that the Tekirdağ component should be replaced with Istanbul Binkılıç RC.

conditions. However, the preliminary acceptance for all six newly constructed RCs has now been issued.

Finally, for the **2016 Activity** the delivery of outputs did not experience any major problems (besides the need for synchronisation responding to delays in construction of the 2015 RCs) and the instalments are foreseen to be completed by mid-2022. The supplied items under seven lots are all needed to start hosting the detainees. They are mostly of sufficient quality for an effective operation of the RC such as equipment and furniture for the boarding rooms, kitchen and administrative rooms, IT tools and X-Ray equipment for security and data processing, medical and laundry equipment and materials, textiles for boarding rooms, etc. Some of the supplies have been installed, whereas some could not be installed due to the construction design failures in considering the technical requirements of the supplies. For example, and drawing on the field visit to the Adana RC; clean and wastewater pipeline at the kitchen and kiosk (canteen), electrical cables and gas pipelines in the kitchen, electrical cables, clean water pipelines for the water fountains at different parts of the building - they do not exist for connection.

JC3.2. The extent to which produced outputs contribute to the achievement of specific objectives (reconstructed Theory of Change, i.e., enhanced physical capacities in the migration and asylum sector)

Regarding the **2014 Activity**, all concerned RCs that were subject to refurbishment were relatively old (e.g., the building in Edirne was built some 10 years ago, the one in Van 14 and in Hatay 23 years ago). In addition, the RCs in Hatay and Aydin had specific infrastructure defects causing problems with underground water which was seriously damaging the basement floors and walls. Therefore, the buildings had important infrastructure needs which were to a large extent addressed by the 2014 Activity, including:

- Improvement of safety and security measures, such as fire and electrical systems;
- Minor adaptations of some of the facilities for people with disabilities (e.g., ramps replaced stairs in some parts);
- Separate blocks that could be used as quarantine areas during the COVID-19 pandemic;
- Separate entrances for material and equipment (separate from the entrance for detainees);
- Better conditions of walls and floors;
- New metal doors that replaced the original wooden doors;
- Safer windows;
- Containers serving as small shops for purchase of urgent needs.

Despite all these improvements, the data collected for this evaluation indicates that the buildings are subject to deterioration in short periods of time. For example, some defects such as new leakages in the wastewater pipelines, shorter battery life of some equipment and faster deterioration of walls have materialised sooner than expected. This is explained with the intensive usage of the RCs, whose infrastructure is old, thus further accelerating the deterioration. Therefore, continuous maintenance and regular refurbishment will be needed to sustain the physical conditions in the RCs.



Moreover, some of the service and infrastructure aspects remain inadequate. For example, some RCs still lack separate rooms for children; besides some minor modifications, no specific measures have been considered for disabled people; systematic psychosocial support is provided, but there is no evidence as to the extent to which this is effective (there are also other services provided by EU funds (through the Grant to PMM), e.g., social workers, interpreters, food engineers etc., however, this is outside the scope of this evaluation). Some RCs are working with high capacities, and this is especially true for the RC in Hatay that is located at the border and accommodates a significant number of migrants. Some RCs experience issues over confidentiality as the conversations of detainees with their lawyers can be heard from outside of their rooms. Finally, inadequate access to information (mostly provided in the Turkish language) and the absence of standardised practices in terms of allowing for lawyers and CSOs to meet detainees were also reported.

Turning to the **2015 Activity**, for the six new RCs delays have been experienced in connecting utilities to buildings thus delaying the readiness of RCs to host migrants. According to the staff of the RC and the PMM Provincial Directorate, the infrastructure of the new RCs was well designed, taking into consideration necessary details for enhancing the physical conditions and capacities of RCs and their management. Indeed, the new RCs are considered to be very comprehensive with detailed sections to allow for a sound management, ensuring compliance with international standards. It was also acknowledged that the RCs have a very good strategic location, e.g., the Kütahya RC is located at the midpoint of the country allowing for the reception of migrants from all parts of Turkey and addressing the important absence of an RC in this area. The Niğde RC is located in the Anatolian region with no RC being located in the surrounding provinces in the eastern part of the region. Overall, it was noted that the new RCs provide high quality services in line with international standards and are expected to be good examples for future RCs. Examples of important positive aspects of the new RCs include: separate sections for men, women and children, and disabled migrants; floor heating and air conditioning; functional bathrooms; spacious rooms and kitchens; prayer, activity and TV rooms; playground for children; open air spaces and separate playgrounds for women and men; excellent reception/admission units; registration sections including a space for providing initial information about legal rights; medical units; communication units; and rooms for psychosocial support (however, please note that in the Niğde RC spaces for library and classrooms – which are essential for access to education and other recreational activities - were not yet designated as of March 2022). The centres also include an IT system for security. The bathrooms and toilets are made from stainless steel, thus ensuring safety and maintenance in the long run. Windows allow for adequate light despite the iron fences. Door locks are safe and reinforced by a central electronic system.

Moreover, it is worth noting that the IOM/UNHCR project also provided for posters, informing the migrants about the ‘in-house rules’, most notably regarding the use of Internet, play and sports rooms. This information will be posted on the walls but also disseminated audio-visually via TVs. The same will be done for informing the detainees about their legal rights.

The RC managers are keen to offer training and education activities in cooperation with the Public Education Centres (PEC) of the Ministry of National Education as this would contribute to the psychosocial well-being of the detainees. In this context, protocols are in preparation with the Ministry of National Education, covering education/training, psychosocial support and social advice. Protocols are also in preparation with the Ministry of Health regarding medical services.

Despite the comprehensive nature of the new RCs, some design deficiencies were reported, e.g., absence of water connections in the canteens of the Adana and Şanlıurfa RCs, negatively affecting the hygiene conditions; omission of exhaust outlet, affecting the laundry rooms; inadequate placing of water and gas pipelines etc. These deficiencies, in some cases because it was not clear if they belong to the works or supply contracts, have become an additional burden on the budget of the PMM.

Finally, regarding the **2016 Activity**, most of the items procured under the seven lots have been delivered, (with a few exceptions, explained by the COVID-19 pandemic). Supplies provided to the newly constructed RCs are of good quality, includes laundry and kitchen equipment, furniture, textiles, x-ray for security purposes and IT equipment, TVs, medical materials, etc. However, some of the supplies could not be installed as the design had not always fully considered the specifications and layout of the supplies. This is considered an important deficiency in the construction design which did not adequately consider the technical specifications and requirements of some supply items, which in turn constrained their operation/functioning.

### JC3.3. The extent to which the selected Activities mainstreamed gender and human rights

The refurbishment of the existing RCs (2014 Activity) included construction, renovation, electrical works etc., thus focusing primarily on improving the infrastructure conditions without major changes to the architectural design or structure of the RCs. This means that to some extent the refurbished RCs remain inadequate for certain groups of detainees such as disabled people or female refugees with children. Indeed, only few RCs have suitable rooms to accommodate these specific needs. This is mainly because of the buildings used by the 'old' RCs were not originally built for this purpose. Therefore, these RCs do not fully attend to all gender and human rights related-needs of migrants, e.g., not all of these RCs include indoor and outdoor activity rooms, separate rooms for meeting legal consultants or facilities for children. Moreover, some of the old RCs are characterised by their limited capacity, potentially causing overcrowding. This in turn might negatively affect the functioning of the RCs in terms of available running water, heating, access to hygiene facilities, personal space etc. At the same time, it is important to note that the 2014 Activity did not aim at new construction but rather refurbishment and minor maintenance. Note also that the supplies include material for children (e.g., child beds, bedding, indoor and outdoor playground equipment, etc.), and these supplies were meant to improve human rights compliance in the existing RCs, to the extent possible.

This becomes even more evident when comparing the 'old' RCs with the six newly constructed RCs (2015 Activity) that largely address gender issues/human rights of migrants. In fact, the technical specifications for the infrastructure and the supplies for these RCs (2015 and 2016 Activity) were identified aiming to provide services in line with relevant international and European standards, including the mainstreaming of gender and human rights. For example, the new RCs have rooms specifically designed for disabled detainees, separate floors for men and women, family rooms, children playground, sports/training rooms, separate kitchens, activity/recreation rooms for adults and children and separate meeting rooms.

The management at the new RCs has adopted a gender and human rights-sensitive approach, e.g., the management team at the Şanlıurfa RC has already developed targeted plans for women, men and children and migrants with disabilities. Moreover, a protocol was prepared to allow for the Public Education Centres of the Ministry of National Education to provide trainings and workshops for the

migrants. A further protocol is in preparation, aiming to allow the Ministry of Health to provide health services. A further positive practice related to gender mainstreaming was observed at the Ankara-Akyurt RC where an exhibition of women's handicraft was organised in an activity room on occasion of International Women's Day on 8 March. Similarly, children activity rooms displayed children's toys and learning materials.

#### 4.4 Effectiveness - factors

##### ***Q4. To what extent did different factors influence the achievement of the Activity/ Theme specific objectives and results?***

The selected Activities have been affected by several factors, the COVID-19 pandemic being the most notable and unexpected one, causing significant delays in the implementation of the 2015 and 2016 Activities. The time gaps between programming and contracting and failure to fully synchronise between the layout and design of the construction of the new RCs have been important constraints.

Moreover, the choice of land was not ideal for constructing RCs with the scale identified in the TSs.

##### JC4.1. The extent to which external and internal factors to IPA II affected (supported or constrained) the effectiveness of the selected Activities

Looking first at **external factors**, the refurbishment of the old RCs (2014 Activity) was constrained by the poor state of the existing infrastructure, reported as not meeting international standards. As a result, problems such as water leakages deteriorating the infrastructure complicated the refurbishment process. This is mostly explained by the fact that the buildings were originally conceived and built as accommodation centres and not as RCs.

The COVID-19 pandemic was one of the major factors constraining the effectiveness of the selected 2015 and 2016 Activities. Among the negative effects, stakeholders noted the suspension of construction works due to the mobility restrictions, the increase in material prices and availability of the material on the markets, all of which contributed to significant delays in their delivery.

Excessive bureaucracy was another constraint. This mostly related to the difficulty of obtaining construction permits from municipalities; services from utility companies (electricity, telecommunication, water); lengthy approval procedures for Environmental Impact Reports; and difficulties with allocating land for the new RCs.

Regarding **internal factors**, the long gaps between programming and contracting constituted an important constraint, with substantial changes of building conditions, needs and prices in the meantime. This meant that a high number of Variation Orders had to be issued and with significantly increased budgets for the construction of the new RCs (2015 Activity).

The insufficient synchronisation of the layout and design of the construction with the technical specifications of the supplies, as discussed above, resulted in additional work, and increased the budget.

Some RCs were reported as being isolated with walls, and high levels of security. Whilst this might be favourable for protection and security, it complicates access for relatives, lawyers etc. Access to migrants is further restricted by the visiting hours in the RCs. While visiting hours are flexible, i.e., between 8 a.m. and 5 p.m., this coincides with the working hours of the lawyers, and the latter noted their preference for providing pro-bono legal advice in the RCs after the regular working hours.

On the other hand, the tailor-made design of the new RCs (2015 Activity), allowed for good adaptation to the conditions of each location. This was facilitated by needs assessments/site visits (prior to contracting) conducted by the Mol, PMM and CFCU. Finally, support and cooperation with other institutions such as municipalities and international organisations were also noted as supporting factors.

#### JC4.2. The extent to which Activities adapted to external factors that affected implementation/existence of mitigation strategy

Regarding the 2014 Activity, the mitigation strategy consisted of a comprehensive risk assessment report and corresponding review involving the PMM and CFCU. The Activity did not require any significant adaptations besides the revisions made in the Bill of Quantities. The latter was caused by the gap between the design and implementation of the 2014 Activity, rendering the original Bill of Quantities partially obsolete.

The 2015 and 2016 Activities required budget revisions, adaptations of the Bills of Quantities (BoQ) and contract adjustments via several Variation Orders. Moreover, comprehensive amendments in the work contracts for the six new RCs (2015 Activity) were required due to shortcomings in the original design. In this context, technical assistance provided by the EU and other organisations was acknowledged as another helpful measure.

The RCs lacked standardised operating practices (SoP), with each RC establishing its own practices. The introduction of standardised operational practices could have a positive bearing on overall effectiveness and support adaptation to external factors. The guidelines for the management of the RCs include several standards in terms of following international approaches at the RCs such as security of the detainees, preservation of their personal materials, medical and hygiene services, training services, reception and registration procedures, food quality control and service procedures, legal consultancy rules, outdoor fresh airtime and sports training facilities, children accompanying measures and education, etc. Currently, the related SoPs are started to be prepared by another EU-funded project implemented by IOM and UNHCR, and the RC staff are being trained on the related topics.

#### JC4.3. Evidence of the selected Activities producing unintended results

Regarding positive unintended results, the three Activities saw the development of strong ownership of the EU and international standards by the PMM and other stakeholders at local level; an increase in social resilience at local level despite some protests experienced in some provinces; and the establishment of a benchmark for the construction of future RCs based on the example of those funded by the EU. No negative unintended results were identified.

***Q5. Are there different modalities of using resources that have produced more results or have decreased the resources needed for the same level of achievements?***

The implementation modality that was used, i.e., construction, supply and supervision, was fully adequate. Moreover, the achievement of outcomes was supported by establishing robust criteria for the selection of candidates and having qualified experts with international experiences for the supervision. On the other hand, longer inception periods and more resources for the preparation of the design and the Bill of Quantities followed by timely implementation without major delays would be adequate alternative modalities.

#### JC5.1. The extent to which the most efficient strategies of implementation can be identified

Construction, supply and supervision is an appropriate implementation modality. Other contributing factors included: selection procedures based on robust criteria ensuring that the most suitable candidates are selected; a Supervision Contractor counting with highly qualified experts with international experience and expertise in FIDIC requirements. Moreover, the CFCU prepared a comprehensive risk assessment and updated it every six months.

Finally, the efficiency of the management of the RCs was ensured by the adoption of several directives (*Directive on Temporary Protection* and the *Directive on Establishment, Management and Supervision of the Admission and Reception Centres and Removal Centres*) by the PMM at central level, and Provincial Directorates of Migration Management (PDMM) and RCs at local level. The flexible architectural design for the RCs (2015 Activity) allowed for adaptation to diverse conditions of the locations.

#### JC5.2. The extent to which alternative strategies of implementation, with expected increased efficiency, can be identified

The inception period for the 2015 and 2016 Activities was not fully adequate for the identification of all needs. Indeed, somewhat longer inception periods would have been more appropriate. Moreover, and as already noted above, the preparation of the design and the Bill of Quantities should be followed by timely implementation without major delays (long delays rendered the Bill of Quantities partially obsolete).

### 4.5 Efficiency

#### ***Q6. How timely and efficient is the Activity/Theme's process of programming, contracting, implementation, reporting and monitoring?***

There have been efficiency issues related mostly to the programming, contracting and implementation of the selected Activities, however, on the whole, the expected results were generated in good quality. Reporting and monitoring practices were well established, allowing for a good follow-up on the progress made towards the indented outcomes and timely identification of possible risks.

#### JC6.1. The extent to which the selected Activities have been implemented according to their planning

Construction and supervision contracts for the selected Activities were signed just before the contracting deadline, and this implied a major gap between programming and actual implementation. For example, implementation of the 2014 Activity started almost four years after the contracting. During this time needs changed, e.g., the RCs proceeded with some refurbishment, repair and

maintenance on their own (national budget). Moreover, new needs emerged that were not covered by the original refurbishment contract. Therefore, the contractor had to process a series of revisions/variation orders. Finally, as already noted above, the implementation of the 2015 and 2016 Activities were affected by the COVID-19 pandemic.

#### JC6.2. The extent to which outputs and outcomes have been generated in time to support effectiveness and impact

Regarding the 2014 Activity, there were no major issues regarding the refurbishing of the RCs, however, supplies were constrained by the cancellation of the construction of the Tekirdağ RC<sup>8</sup>, and delays in finalising the construction of the Bayburt RC.

Supplies under the 2016 Activity were delivered in good time for the RCs to initiate operations. However, whilst the seven supply lots were appropriate to operationalise the newly constructed RCs (2015 Activity), not all supplied items are fully compatible with the design/construction of the new RCs. Moreover, construction delays (2015 Activity) led to delays in connecting the equipment and utilities (2016 Activity), and therefore delays in the opening of the new RCs. For example, the construction of the new Adana RC commenced on 24 April 2019, was planned to be completed by 20 April 2021, but could only be completed in March 2022. The planned construction duration was 630 days, with an extension of 241 days. The main reasons were the pandemic and the major changes in the BoQs to improve the quality of the RC.

#### JC6.3. Evidence of a sound and results-oriented reporting practice

Monthly progress reports including recommendations for improvements were prepared regularly and used for internal monitoring. This was complemented by regular reports prepared by the Supervision Contractor. Indicators in the log-frames of the Action Documents were identified only in quantitative terms, while the Technical Specifications focused mainly on the quality of material used and the quality of outputs. To harmonise this, log-frame matrixes should ideally include both qualitative and quantitative indicators. For example, the 2015 Activity included the following quantitative indicators: (1) 'Hosting capacity for irregular migrants in RCs in Turkey' with a target value of 4,890; and (2) 'Number of RCs, co-financed by the EU and functioning in line with international standards' with a target value of 19. Ideally, additional indicators should be used allowing, e.g., for measuring the extent to which the needs of specific groups of migrants such as children, women and disabled people are met.

#### JC6.4. Existence of a sound monitoring system

Stakeholders confirmed the existence of an adequate monitoring system. Quarterly Steering Committee meetings and Management Meetings were organised regularly and reported as useful for the monitoring of the progress and risks. The monitoring was further supported by regular site visits as well as on-the-spot monitoring visits by all the stakeholders, particularly the EUD, PMM, CFCU and Mol, not only at expert level but also at top management level.

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<sup>8</sup> Recently, the CFCU and PMM agreed, with NIPAC's approval, that the Tekirdağ component should be replaced with Istanbul Binkılıç RC.

Being the Lead Institution of the Migration Sector of IPA II, the MoI has adopted a Monitoring Plan to assess the progress of the programmes in line with the related Action Documents. For example, most recently, a Monitoring Team of the MoI paid a field visit to the Ankara Akyurt RC.

At sectoral level, the progress of the Activities targeted in the Action Documents are assessed by all the main stakeholders at the Sectoral Monitoring Committee (SMC) for the Home Affairs sub-sector organised by the DEUA with the participation of the EUD, MoI, CFCU and PMM.

The EUD has had a hands-on approach to monitor the implementation of the activities to ensure the achievement of outputs and results. Specific support has been provided by the EUD in identifying the risks and recovery of the project progress and even a significant increase in the budget for the construction of the six new RCs.

The CFCU has closely monitored the implementation of the Activities as per PRAG and FIDIC, and delivery of the outputs as identified in the BoQ and TS, in addition to the budget control and payments.

#### JC6.5 The extent to which Activities have been communicated effectively

There were some difficulties regarding the communication with municipalities and utility companies (electricity, natural gas, water, sewage providers). Moreover, the local population, in general, did not perceive the construction of RCs in their vicinity positively, suggesting a need for more awareness raising targeting the local population.

#### ***Q7. How efficient and effective are the institutional mechanisms, which ensure coordination among the various components and stakeholders of the Activity/Theme?***

Overall coordination was efficient/effective, however, there were coordination issues between the PMM, provincial directorates and RC management.

Sector-wide coordination is under the responsibility of the Migration Policy Board as per the Law on Foreigners and International Protection No. 6458, which met several times in 2017 and 2018, but restructured as Migration Board in 2018. Since then, the Migration Board has been meeting regularly, and the most recent meeting was held on 15 September 2021. The Migration Board has started the preparations of the migration strategy document. Turkey's Strategy Document and National Action Plan on Irregular Migration covering the period 2019-2025 has been endorsed by the Migration Board. The strategy was prepared with the technical assistance of the IOM with EU financial support. The action plan identifies institutions in charge of each strategic priority, timelines and indicators to measure the effectiveness of implementation. A six-monthly reporting mechanism is set up to monitor the implementation of the plan.

Additionally, in 2017 all the governorates with RCs in their provinces have set up **Migration Commissions** comprising of migration experts, academics, CSOs (Red Crescent (Kızılay), ASAM, BAR Association, etc.), officials from health and education institutions and municipality representatives as well as IOM and UNHCR, to support the good functioning of the RCs and monitor their performance.

According to the protocol signed in 2016 between Kızılay and PMM, Kızılay monitors the physical conditions of facilities and service standards to irregular migrants; and evaluates the process and provides inputs towards increased service efficiency.

The Protocol signed between the PMM and the Ministry of National Education ensures delivery of vocational and skills development training and basic education to the detainees and their children at the RCs. The Protocol signed between the PMM and the Ministry of Health ensures delivery of medical services to the detainees at the RCs and at the provincial medical health centres.

#### JC7.1. The extent to which the selected Activities ensured coordination with other relevant initiatives

There was good cooperation and coordination between the Supervision Contractor, PMM, CFCU and the EUD. However, coordination between the PMM, provincial directorates and RC management experienced some difficulties, and somewhat constrained the efficient establishment of operational conditions for the new RCs. Coordination with municipalities was generally efficient, facilitating access of the RC to utilities (electricity, water, wastewater, gas, etc.).

Activities were well coordinated with initiatives implemented by other actors, e.g., IOM and UNHCR. UNHCR, one of the actors entitled to meet detainees in the RCs, signed an agreement with PMM regarding the provision of information, legal aid, and protection-related services. UNHCR also provides the PMM with technical assistance on a vulnerability assessment. Moreover, the Activities are directly preparing the grounds for other projects such as the '*Assisted Voluntary return and reintegration (AVRR) of Irregular Migrants in Turkey*' by preparing an effective and sustainable return programme to reduce irregular migration, which would be facilitated through an effective cooperation with the RCs. Finally, the selected Activities were well complemented by other 'soft' initiatives such as capacity building and training for staff in RCs. For example, the project '*Supporting Directorate General for Migration Management (DGMM) Efforts in Enhancing the Capacity of Removal Centres within the Framework of International Human Rights Standards Phase I and II*' funded by the UK and implemented by IOM, and the project '*Supporting Removal Centres' Capacities and Fostering Alternatives to Administrative Detention*' implemented by IOM and UNHCR, fully complement the interventions under Activity 1 of 2014, 2015 and 2016 Action Documents.

## 4.6 Impact

### **Q8. Which long-term changes have the Activity/Theme contributed to regarding the sector in question (Migrants benefiting of enhanced physical conditions)?**

The selected Activities have already made significant contributions to the wider objective of '*Migrants benefiting of enhanced physical conditions*', mainly by enhancing the infrastructure and equipment of the 'old' RCs and the construction of new RCs in alignment with international and European standards, and in consideration of specific needs of migrants arriving to Turkey, such as disabled people, children, or women. Continuous efforts are required in terms of adequate management of the RCs and regular revisions of their conditions for achieving and maintaining the long-term changes.

#### JC8.1. The extent to which the selected Activities contributed to impact, i.e., migrants benefiting of enhanced (physical) conditions



The involvement of the EU in the construction of the RCs allowed for ‘leverage’ in the discussion regarding the quality standards of the RCs, not only in relation to the physical infrastructure, but also the location of RCs and their equipment.

Infrastructure in the refurbished ‘old’ RCs has been improved, thus enhancing the overall quality of life at the RCs. New RCs will increase the removal capacity, thus decreasing the risk of overcrowding. They also respond to the specific needs of migrants due to the new features (missing in the old RCs). As such, the Activities will increase the overall quality of the RCs, contributing to enhanced compliance with European and international standards.

Finally, Activities have provided PMM with good examples and important experience that can be used in the context of the construction of additional RCs in the future.

#### JC8.2. The extent to which external factors could affect future impact

Inadequate maintenance and management of the RCs is the main risk factors for future impact. Indeed, the operation of the RCs will require continuous maintenance of technical systems, equipment, utility services and the presence of well-trained staff.

### 4.7 Sustainability

#### ***Q9. How likely the effects are to last after the intervention ends?***

Prospects for sustainability are good, especially if the lead beneficiary ensures the regular review and refurbishment of the infrastructure/equipment in the old RCs and adequate management/capacity development at all RCs.

#### JC9.1. The extent to which outputs under the Activities are likely to be maintained (reconstructed Theory of Change, i.e., physical facilities and supplies operational - infrastructure)

During the warranty period there should be no issues in sustaining the refurbished or newly constructed infrastructure. However, sustainability also depends on the usage of the RCs by the detainees (e.g., risk of detainees deteriorating infrastructure/equipment). Infrastructure/equipment is also likely to deteriorate faster during periods of high influx of refugees/overcrowding of RCs.

Finally, staff at local level needs to be appropriately trained to ensure the adequate utilisation of the premises and equipment. The presence of permanent technical staff is a key condition for sustainability.

#### JC9.2. The extent to which outcomes under the Activities are likely to be maintained (reconstructed Theory of Change, i.e., enhanced physical and institutional capacities)

Adequate management of the RCs will be key for sustaining outcomes. In this context, training for RC staff and the adoption of several directives aiming at ensuring effective RC management are factors supporting sustainability. With the increase in the number of RCs, the RC management at PMM might require further strengthening. Moreover, the current number of staff at province level might not be sufficient in case of an increased influx of migrants. In this context, cooperation with CSOs and international actors could further support the RCs.

There will also be needs in terms of communication and coordination between the actors at central and province level and between the latter and RC management. Similarly, good ongoing cooperation with the service providers will be important, and there might be needs for additional services, such as psychosocial support, legal aid and health services. In this context, there is a need for ensuring access of lawyers, CSOs and health emergency services, ideally by establishing standardised practices for access.

Finally, the sustainability of the selected Activities will depend on the allocation of adequate human/financial resources (specifically considering the possibility of increasing numbers of migrants). Indeed, costs relating to transportation of detainees, cleaning, energy consumption, telecommunication are covered by the national budget. Note also that considerable support is being provided to the transportation of irregular migrants by the project 'Supporting DGMM in the Management, Reception and Hosting of Irregular Migrants' (IPA/2020/417-955), and this is in addition to the support provided by the project 'Support to the Implementation of the EU-Turkey Statement of 18 March 2016' (IPA/2016/375-062).

***Q10. What are the main risks to sustainability, identified at the Activity/Theme implementation stage/materialised beyond Activity/Theme implementation?***

Intense usage of the RCs e.g., in case of seasonal overcrowding, incorrect use of the infrastructure and equipment by RC staff and/or detainees, poor management and lack of qualified staff are the main risks regarding the sustainability of the selected Activities.

JC10.1. The extent to which external and internal factors affected (supported or constrained) the sustainability of Activities

Regarding the refurbished RCs, physical deterioration of the infrastructure due to **intense usage** of the RCs and/or **poor usage of the infrastructure** are one of the possible risks. Some of the damages at the RCs were caused by migrants suffering from trauma and psychosocial disorders. **Lack of adequate and timely psychosocial support** is a further factor that might constrain the sustainability of Activities.

A higher influx of refugees caused by political unrest in neighbouring countries might cause **'seasonal' overcrowding** in the RCs, and this might put additional pressure on the infrastructure and equipment, causing further deterioration. Especially the old RCs will require regular review/refurbishment.

In this context, an increased influx of migrants from some regions (e.g., Middle East, Central Asia and Africa) is likely, affecting mainly the Southern and Eastern border regions. This will require effective cooperation **between Turkey and relevant embassies** to facilitate readmission.

Finally, a further possible risk relates to **poor management of RCs**, e.g., because of the absence of standardised operational practices, and/or staff shortages. **Insufficient staff numbers/high turnover rates** might further constrain the management and maintenance of RCs.

#### 4.8 Added value

***Q11. What is the added value of the Activity/Theme, compared to what could be achieved without the EU support?***

The selected Activities have demonstrated strong added value, with stakeholders acknowledging that similar results would not have been possible without EU support.

JC. 11.1. The extent to which the progress in the development and capacity of migration facilities could be achieved without the support of EU IPA II (based on the initiatives of TR stakeholders or international organisations)

The quality and physical conditions of RCs supported by the EU are significantly better than those built without EU support. This is partially explained by the fact that the new RCs are purpose-built (the old RCs were often conceived as accommodation centres). The quality of RCs that were refurbished was increased but they still faced problems given that their original purpose was different (accommodation centres).

JC. 11.2. The extent to which the EU is visible as a key supporter for the migration sector

No RCs with such qualifications and standards could have been built without EU support, mainly due to the lack of expertise and finance. In addition, EU support not only provided experience that can now be replicated in future initiatives, but also raised awareness on human rights and gender considerations.

EC support is visible and assessed by these relevant institutions as of high added value for the improvement of irregular migration management in Turkey which has been in need of a response to the increasing influx of migrants being on the route to the EU.

## 5 OVERALL ASSESSMENT CONCLUSIONS, LESSONS LEARNED AND RECOMMENDATIONS

### 5.1 Conclusions

The selected Activities demonstrated a strong performance in light of the evaluation criteria. Activities were fully **relevant** for the achievement of enhanced physical conditions for migrants. Activities were well aligned with Turkey's migration policy framework and the EU's accession policy. The Activities were also aligned with the needs of the PPM and final beneficiaries (migrants at RCs). Activities also demonstrated good levels of flexibility to address unexpected situations, e.g., the COVID-19 pandemic.

Activities built upon previous EU initiatives, thus ensuring strong internal **coherence** and continuation of efforts. The selected Activities were also coherent with initiatives of other international actors in the field of migration, e.g., UNHCR and IOM, ensuring the absence of any duplication of efforts and complementarity of the different activities.

Looking at the reconstructed theory of change, the selected Activities greatly contributed to achieving the intended outcomes, namely enhanced physical capacities and conditions for the migrants. The **effectiveness** of the Activities is confirmed, both in terms of infrastructure improvements of old RCs through supply and refurbishment works, and increased removal capacity and enhanced conditions through construction of new RCs in line with European and international standards. The COVID-19 pandemic caused significant delays in the implementation of the 2015 and 2016 Activities. The gap between programming and contracting and the limited synchronisation between the layout and design of the construction of the new RCs were important internal hindering factors.

Despite several **efficiency** issues related mostly to the programming, contracting and implementation of the selected Activities, on the whole, outputs and outcomes were generated in good quality. Reporting and monitoring practices were well established, allowing for a good follow up on the progress made towards the intended outcomes and the timely identification of possible risks.

In terms of **impact**, the selected Activities have already significantly contributed to enhanced physical conditions, mainly by improving the infrastructure and equipment of the old RCs and by opening new RCs, aligned with international and EU standards, and in full consideration of specific and different needs of migrants arriving to Turkey, such as disabled people, children, or women. Continuous efforts are needed in terms of adequate management of the RCs and regular revisions of their conditions to achieving and maintaining the long-term changes.

Several conditions necessary for ensuring the **sustainability** of the achieved outcomes as well as risks that might negatively affect the sustainability were identified. There is a strong need to ensure regular revisions and refurbishment of the infrastructure in the old RCs and adequate management and experienced staff at all RCs. Seasonal overcrowding resulting in intense usage of the RCs, incorrect use of the infrastructure and equipment by RC staff and/or detainees, poor management and lack of qualified staff were identified as the main risks.

Finally, the selected activities demonstrated strong **added value**, with stakeholders acknowledging that similar results would not have been possible without EU support. This is due mainly to the EU

expertise and previous experience in the migration sector, which brings the RCs in Turkey closer to international and EU standards and raises awareness of human rights and gender considerations.

## 5.2 Lessons learned

- A certain degree of **flexibility** in the design of the RCs is necessary to allow for an adequate adaptation to the specific conditions and needs in each location.
- **Cooperation with international actors** active in the migration sector is key for ensuring not only the coherence between activities but also their complementarity. In the case of RCs, this cooperation will most likely enhance the overall functioning of the RCs due to the linkages between the selected Activities and other relevant projects.
- Mere infrastructure improvements are not sufficient for meeting all the EU and international standards. Provision of adequate information, children's access to education, having measures in place for meeting the special needs of disabled people and women with children, provision of psychosocial and legal support and avoiding overcrowding in the RCs are key factors for ensuring that **human rights and gender-based needs are met**.
- **In-person site visits** by the main stakeholders, i.e., Ministry of Interior, PMM and CFCU, before the contracting phase were effective in terms of identifying possibilities for improvements.
- **Longer inception periods** are necessary for an adequate identification of all needs related to the construction and supplies for RCs.
- The programming and preparation of the Bills of Quantities should be followed by **timely implementation** to avoid changes in needs because of the long gap between programming and implementation.

## 5.3 Recommendations

### Relevance

While the Activities were well aligned with the needs of the final beneficiaries, special attention should be paid to psychosocial support for the detainees as there have been cases of traumatised migrants damaging RC infrastructure. Whilst this is already included in the IOM/UNHCR project, it is important that this type of support is sustained in the future. Recommendation (to be implemented by the PMM/province directorates): **staff at the RCs should be given adequate training on how to treat and manage people that might have suffered traumatic events. Further capacity building for RCs staff aimed at developing awareness of international standards would be equally advisable, e.g., in the form of a workshop for all RC managers and experts.**

RCs (especially the newly constructed ones) include facilities for children (e.g., playgrounds). However, further room for improvement has been identified, e.g., some RCs lacked designated rooms for educational activities, and playground conditions were not fully adequate (no soft floors, no shade). Recommendation (to be implemented by the PMM/province directorates): **the design of the RCs should pay more attention and give priority to facilities and equipment for children to ensure that their rights are adequately met during their stay at RCs.**

## Effectiveness

The RCs have flexible visiting hours usually between 8am and 5pm, however, this overlaps with other commitments of lawyers or CSOs. Access is further complicated by RCs being located far from the city centres. Recommendation (to be implemented by the RC management): **to adapt the visiting hours in a way that facilitates access of lawyers and CSOs to migrants.**

RC staff are planning for activities that will contribute to the psychosocial wellbeing of migrants, however, there is a lack of materials. Recommendation (to be implemented by the PMM): **to include tools and materials that will support the provision of the psychosocial support into the lots for future supplies.**

Open-air and sport facilities have been included in the design of the new RCs. However, some of these facilities have low ceilings and are too small to accommodate the potential demand, thus not offering healthy and adequate conditions for sport activities. Recommendation (to be implemented by the Mol and PMM in the context of future programming): **to ensure adequate and sufficient space for outdoor and sport activities, taking into consideration the potential increase in the number of migrants arriving to Turkey in the future.**

There have been issues with local communities having a negative perception of migrants and RCs. Recommendation (to be implemented by the PMM, province directorates and RC management in the context of future construction of RCs): **to enhance communication aimed at the local population through awareness raising events/campaigns.**

## Efficiency

The gap between programming and contracting implied important changes in needs, conditions and prices, and this led to numerous variation orders and a budget increase. Recommendation (to be implemented by the PMM in the context of future programming and contracting): **to ensure timely programming and contracting. At the same time, the needs analysis (underlying the programming) should be regularly updated in the time before the contracting is completed, thus allowing to consider and adapt to changing conditions.**

Almost all the newly constructed RCs experienced mismatches between the construction/infrastructure and supplies. Recommendation (to be implemented by the PMM): **to ensure an adequate synchronisation of the construction/infrastructure of the RCs and related Technical Specifications for the supplies to avoid corrections and related additional expenses.**

## Sustainability

To ensure the sustainability of the Activities and their outcomes, mere refurbishment of the RCs is not sufficient. Recommendation (to be implemented by the PMM, province directorates and RC management): **to ensure regular revision of the infrastructure of the RCs and regular procurement of adequate equipment and materials to sustain the key services such as kitchen, bed textiles, IT, electronic equipment, x-rays etc.**

The current infrastructure (physical and institutional) of the RCs might not be sufficient to respond to needs during periods of high influx of migrants. Recommendation (to be implemented by the Ministry of Interior and PMM): **ensure adequate and sufficient allocation of budget to/and staff in the RCs to maintain the physical conditions and smooth management of the RCs, particularly during periods of high migrant influx.**

One of the difficulties/risks to sustainability was the impossibility to maintain some of the items installed, due to the absence of their spare parts on the market, e.g., due to changes in brands or types available. Recommendation (to be implemented by the PMM and province directorates): **to consider the replacement of the spare parts in the Bill of Quantities during its preparation to ensure adequate maintenance of the installed equipment. Spare parts (such as tiles or paints) can be procured together with the original items to allow for an immediate replacement and repair if needed.**