

TRANSPARENCY POLICY

Policy Number: SDIII-POL2018/

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I- PURPOSE OF THE POLICY

Transparency Policy (“The Policy”) sets out European Union Sivil Düşün Programme (Sivil Düşün) attitude and methodology to transparency. Being an EU project, Sivil Düşün considers other EU Complaints Mechanism Principles, and relevant Codes of Conduct applicable to EU projects.

II- OPENNESS

This Policy is framed by openness and transparency with the approach that all the information concerning the supports, activities and events will be made available to the public, unless there is a valid exception. This frame is based on the principle of non-discrimination and equal treatment and in line with EU legislation, and internationally accepted principles.

Sivil Düşün considers to be transparent about how they make decisions, work and implement EU policies, this transparency strengthens the programme’s credibility and accountability. Transparency also contributes to the growth of the efficiency, effectiveness, impact and sustainability of the project.

Sivil Düşün understands transparency as the environment where the necessary information, decisions, documents are provided to the applicants, potential applicants, EUD and other project stakeholders, in general public in a comprehensive, accessible and timely manner.

III- ENSURING TRUST AND SAFEGUARDING SENSITIVE INFORMATION

As all the applicants must maintain the confidence and trust of Sivil Düşün, it is necessary to alleviate concerns about the treatment of confidential information. This Policy ensures the information shared with Sivil Düşün is protected from disclosure when disclosure would damage the legitimate rights and interests of real people and organizations.



IV- WILLINGNESS TO LISTEN AND ENGAGE

Sivil Düşün is committed to open communication. Sivil Düşün is open to a constructive dialogue with all stakeholders and especially applicants are encouraged to share their experiences frequently through surveys, meetings and any other chance of communication.

V- INSTITUTIONAL FRAMEWORK

Sivil Düşün was designed to support the European Union Delegation to Turkey (EUD) in their efforts to improve the environment for active citizenship and to strengthen the capacity of organized and active citizens. Through various support mechanisms, Sivil Düşün supports active individuals and civil society organisations. The programme was designed to strengthen the structures and values of participatory democracy. The programme supports are open to all the activities that strive to contribute to the strengthening of democratic values, and are based on stringent principles of fair competition, equal opportunity and transparency.

Phase-I of Sivil Düşün started on 22 November 2012 and completed on 22 November 2016, with a Technical Assistance Team mobilized by the awarded consortium. Many of the consortium members in Phase-I were also included in the awarded consortium of Sivil Düşün-II. Phase-II formerly began on 1 March 2016 and ended on 31 May 2018, with a 3-month extension. Phase-III of Sivil Düşün is a continuation of the previous 2 phases.

Sivil Düşün ensures that its activities respect EU policies and laws or, where these are not applicable, uses EU policies and laws as the best reference. Improving the transparency of its institutions and bodies is a key European Union policy aimed at bringing them closer to the publics they serve, as well as highlighting their relevance in contributing to Europe's social and economic cohesion and sustainable development and the promotion of the objectives of the Union's external cooperation.

The principle of openness is enshrined in Article 1 of the Treaty on European Union (TEU), which states that the Treaty marks a new stage in the process of creating an ever closer Union among the peoples of Europe, in which decisions are taken as openly as possible and as closely as possible to the citizens. Openness also contributes to strengthening the principles of democracy and respect for fundamental rights, in line with Article 6 TEU. Article 15(1) of the Treaty on the Functioning of the European Union (TFEU) requires Union institutions, bodies, offices, agencies to conduct their work as openly as possible in order to promote good governance and ensure the participation of civil society.

The stability and proper functioning of democratic institutions is also part of the Copenhagen political criteria. Enlargement countries are expected to prioritize transparency, accountability and effectiveness of institutions and public administrations.



VI- PUBLICATION OF INFORMATION

In order to support and promote the principle of transparency, Sivil Düşün is fully committed to regularly publish accurate information regarding its role, policies and operations in a timely fashion.

Sivil Düşün routinely publishes a broad set of documents including

- Application Guidelines
- Implementation Guidelines
- Key Documents on Supports
- Toolkits, Support Guides and Presentations
- Visibility Guideline
- Sample Documents

The main tool for disseminating this information is the Sivil Düşün website (www.sivildusun.net). Sivil Düşün also disseminates information to the public and civil society actors by other means such as hard copy publications and informative documents, social media, press releases, conferences, seminars, trainings, info days, round table meetings and civil society forums.

All information produced by the support requestors are to be published with below disclaimer:

"This - material/document etc. - has been produced as part of European Union Sivil Düşün Programme, with the support of European Union. The contents of this - product/document etc. - are the sole responsibility of the owner and can in no way be taken to reflect the views of the European Union."

In order to promote the accessibility of information, Sivil Düşün is committed to a language regime that considers the public's needs. The application forms are published in Turkish, English, Kurdish and Arabic. If needed, translation is provided for other languages.

Within the limits imposed by applicable laws and regulations, the final determination as to what information may be released to the public shall rest with Sivil Düşün, which shall also decide which documents to publish, in electronic and/or in paper form, and which documents are available on request only.



VII- INFORMATION FOR APPLICANTS AND POTENTIAL APPLICANTS

Applicants have access to Sivil Düşün's MIS (Monitoring Information System). The applicants can trace their applications from the system with the application number.

A summary of applications may be published on Sivil Düşün website with the consent of the applicant.

Applicants can call Sivil Düşün ACM (Active Citizenship Mechanism) Hotline, one of the most important tools of Sivil Düşün in terms of providing additional explanation for the key concepts used by the programme, including providing clarifications to the rights-based approach.

VIII- DISCLOSURE OF INFORMATION

All information and documents produced under Sivil Düşün are subject to disclosure unless there is an acceptable reason for non-disclosure. See Exceptions below.

All users enrolled in Sivil Düşün MIS (Monitoring Information System) are requested to provide their consent for sharing the personal data with the third parties electronically. The agreement text at the address:

<http://sivildusun.net/kisisel-verilerin-islenmesine-iliskin-aydinlatma-ve-riza-metni/is> attached to this Policy.

Social media accounts are legally bound by the respective hosting services (Facebook, Twitter, Instagram, YouTube), encompassing entire accounts within these services.

IX- EXCEPTIONS

While Sivil Düşün is committed to a policy of conjecture transparency, it also has a duty to respect secrecy in compliance with EU legislation to protect personal data and National regulations.

There are therefore certain constraints on the disclosure of information/documents.

Notably, access shall be refused where disclosure would undermine the protection of:

- the public interest,
- privacy and the integrity of the individual, in particular in accordance with EU legislation regarding the protection of personal data.

Information shall not be disclosed when:



- commercial interests of a natural or legal person;
- intellectual property; o court proceedings and legal advice;
- the purpose of inspections, investigations and audits.
- Applicant did not give consent

X- PROCEDURES FOR HANDLING INFORMATION REQUESTS

All potential applicants are encouraged to enroll at Sivil Düşün MIS. Information requests can be done through MIS.

In addition to MIS, information can be requested from info@sivildusun.eu.

MIS and e-mail messages will be replied within latest 7 days.

In addition to these channels a dedicated hotline will serve the support and information requests.

XI- PROVISION FOR COMPLAINTS

- Any applicant or natural/legal person affected by the actions of Sivil Düşün may send a complaint to Sivil Düşün at complaints@sivildusun.eu, sikayet@sivildusun.eu or by filling in an online form available in Turkish, English, Kurdish and Arabic (<http://www.sivildusun.net>). Complaints must be sent within one month from the date on which the facts upon which the allegation is grounded could be acknowledged by the complainant. Complaint form can be found in attachment.
- In case of dissatisfaction with the outcome of the complaint sent to Sivil Düşün, applicants can make a compliant to EU Delegation to Turkey.

