



Environmental & Social Management System

Community Development Framework

Community Development Framework

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OMAS-ESMS-CD-PLN-0001

Rev:
1

TABLE OF CONTENTS

1	INTRODUCTION	4
1.1	DOCUMENT NUMBER	4
1.2	PURPOSE	4
1.2.1	OBJECTIVES OF OMAS COMMUNITY DEVELOPMENT ACTIVITIES	4
1.3	APPLICATION	5
1.4	COMMENCEMENT	5
1.5	AUTHORITY AND MANAGEMENT	5
2	SCOPE	5
2.1	SCOPE OF THIS FRAMEWORK	5
2.2	OVERLAPS WITH OTHER MANAGEMENT PLANS	5
3	ROLES AND RESPONSIBILITIES	6
3.1	KEY ROLES AND RESPONSIBILITIES FOR FRAMEWORK IMPLEMENTATION	6
3.2	KEY INTERFACES	6
4	PROJECT STANDARDS	7
4.1	APPLICABLE TURKISH NATIONAL STANDARDS	7
4.2	TURKISH EIA REQUIREMENTS	7
4.3	OTHER COMMITMENTS TO AND REQUIREMENTS OF TURKISH GOVERNMENT AUTHORITIES	7
4.4	APPLICABLE INTERNATIONAL STANDARDS AND GUIDELINES	7
4.5	APPLICABLE CENTERRA AND OMAS STANDARDS, POLICIES AND PROCEDURES	7
4.5.1	<i>OMAS Sustainability Policy</i>	8
4.5.2	<i>OMAS Social Investment Policy and Plan</i>	8
4.5.3	<i>OMAS Local Employment and Training Procedure</i>	9
5	MANAGEMENT APPROACHES	10
5.1	SUMMARY	10
5.2	OBJECTIVES	10
5.3	PRINCIPLES	11
5.4	APPROACH	12
5.4.1	KEY ACTIONS	12
5.4.2	PROPOSED THEMES FOR COMMUNITY DEVELOPMENT	12
5.4.3	PLANNING FRAMEWORK	13
5.4.4	GOVERNANCE	13
5.4.5	INVESTMENT/SELECTION CRITERIA	13
5.4.6	COMMUNITY DISCLOSURE	14
6	IMPLEMENTATION SCHEDULE	14
6.1	REVIEW AND REVISION OF THIS FRAMEWORK	14
6.2	KEY IMPLEMENTATION MILESTONES	14
7	MONITORING	14
7.1	OVERVIEW OF MONITORING REQUIREMENTS	14
7.1.1	MANAGEMENT REPORTING	15
7.1.2	PROGRESS AND PERFORMANCE REPORTING	15
7.1.3	MONITORING AND EVALUATION OF COMMUNITY DEVELOPMENT PROJECTS	15



Community Development Framework

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CD-PLN-0001

Rev:
1

7.2	KEY PERFORMANCE INDICATORS	16
8	TRAINING	16
9	AUDIT AND REPORTING	16
9.1	AUDITING	16
9.2	EXTERNAL AUDITING	16
9.3	RECORD KEEPING	16
10	DOCUMENT CONTROL	16

Tables

Table 1: Key Roles and Responsibilities	6
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Community Development Framework

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CD-PLN-0001

Rev:
1

1 INTRODUCTION

1.1 Document Number

This document is the Community Development Framework for the Öksüt Gold Project. The document reference number for this Framework is OMAS-ESMS-CD-PLN-001.

1.2 Purpose

The purpose of this Framework is to:

- define the scope of the Framework and set out applicable management interfaces;
- define roles and responsibilities;
- outline the applicable Project Standards relevant to this Framework;
- define Project commitments, operational procedures and guidance relevant to this Framework;
- define monitoring and reporting procedures, including Key Performance Indicators;
- define training requirements;
- set out references for supporting materials and information.

The Framework has been prepared to set out the key objectives, requirements and commitments which will be developed further in a more detailed Management Plan and applicable Procedures once additional information has been collected and detailed management actions have been defined. The Management Plan will supersede and replace this Framework.

1.2.1 Objectives of OMAS Community Development Activities

The overall purpose of this Community Development Framework is to maximise the positive long-term impacts on local communities around the Öksüt Mine.

The Community Development Framework goes beyond the specific impact mitigation measures that the Project will employ and the compensation of affected people for adverse impacts (such as compensation for land acquisition and crop disturbance).

The Community Development Framework is at the core of OMAS's commitment to "sustainable development":

- It ensures that additional benefits are brought to those settlements in the vicinity of the mine site as part of OMAS's efforts to be a "good neighbour" in line with OMAS Policies and the commitments set out in the ESIA;
- It is focused on the key project-affected neighbourhoods as defined in the ESIA, namely: Öksüt, Zile, Epçe, Tombak, Sarıca, Gazi, Gömedi, Yazıbaşı and Yukarı Develi – followed by the neighbourhoods to the south of the power line Çayırözü, Soysallı and Sindelhöyük and then Develi District more generally.

It is important to recognise that some neighbourhoods will only receive indirect benefits from the implementation of Community Development activities, and that where there are direct benefits these might vary between neighbourhoods depending on the potential and willingness for participation and contribution in suitable and sustainable projects (as defined in this Framework).

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

1.3 Application

The requirements set out in this Framework apply to all OMAS activities throughout the lifecycle of the Öksüt Gold Project, including those carried out by contractors.

This Framework is based on the OMAS Environmental & Social Management System Framework (OMAS-ESMS-001), which is owned by the OMAS General Manager. Any subsequent changes to the OMAS Environmental & Social Management System (ESMS) Framework may result in the changes to this Framework document.

1.4 Commencement

This Framework applies from 1 April 2016.

1.5 Authority and Management

The OMAS General Manager approved this Framework on 1 March 2016.

This Framework is owned by the OMAS Director, External Affairs and Sustainability. This Framework and the subsequent Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During steady state operations, this Management Plan will be reviewed on an annual basis to determine whether any changes or updates are required to the Management Plan unless a more frequent update is required to reflect changing project design or procedures.

Any requests for changes to this Framework must be addressed to the owner of this Framework and will be subject to appropriate review and approval processes as outlined in the MOC procedure set out in the ESMS Framework.

2 SCOPE

2.1 Scope of this Framework

This Framework covers all OMAS activities, including contractor activities. Implementation by contractors is addressed in the Contractor Management Framework (OMAS-ESMS-CM-PLN-001).

2.2 Overlaps with other Management Plans

This Framework is part of the overall suite of Management Plans developed for the OMAS Project and as described in the ESMS Framework Document (OMAS-ESMS-001).

This Framework has overlaps and cross-linkages to a number of other Management Plans and Frameworks which have community development implications, including:

- the Emergency Response Plan (OMAS-ESMS-ERP-PLN-001), particularly in relation to the protection of local communities from the effects of accidents and incidents;
- the Labour Management Plan (OMAS-ESMS-LM-PLN-001), particularly in relation to the local employment;
- the Contractor Management Plan (OMAS-ESMS-CM-PLN-001) particularly in relation to the local employment and local procurement;
- the Water Resources Management Plan (OMAS-ESMS-WR-PLN-001), particularly in relation to the protection of potable drinking water supplies;

Community Development Framework

Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1
-------------------------------	-------------------------------------------	-----------

- the Mine Closure Framework (OMAS-ESMS-CP-PLN-001), particularly in relation to protection of local communities from physical hazards remaining once the mine has stopped operating and ensuring enduring positive benefits from the Project after closure;
- the Livelihoods Restoration Framework (OMAS-ESMS-LR-PLN-001), particularly in relation to ensuring livelihoods of those directly affected by the Project are protected;
- the Stakeholder Engagement Plan (OMAS-ESMS-SEP-PLN-001), particularly in relation to ensuring that local stakeholders are appropriately informed and engaged concerning community development activities;
- the Local Employment and Training Procedure (OMAS-HR-PRC-004), particularly in relation to local procurement and employment.

The Community Development Framework will also be developed to complement other relevant national, regional and local development plans, in particular the activities of the Middle Anatolia Development Agency (www.oran.org.tr).

3 ROLES AND RESPONSIBILITIES

3.1 Key Roles and Responsibilities for Framework Implementation

Principal roles and responsibilities for the implementation of this Framework are outlined below.

Table 1: Key Roles and Responsibilities

Role	Responsibilities
OMAS General Manager	<ul style="list-style-type: none"> • Ensure Project compliance with the Project Standards and other requirements set out in this Framework. • Approval of this Framework and resources required for implementation.
OMAS Director External Relations & Sustainability	<ul style="list-style-type: none"> • Overall responsibility for Framework scope and implementation. • Development, monitoring and revision of this Framework.
OMAS Community Relations Manager	<ul style="list-style-type: none"> • Timely implementation of this Framework, including coordination with implementing organisations and other stakeholders.

A number of organisations exist that work to improve the livelihoods, opportunities and facilities of local communities surrounding the Project. As set out in this Framework, OMAS will collaborate with these partners.

3.2 Key Interfaces

Key interfaces in the implementation of this Framework (i.e. roles with responsibility for delivering elements of this Framework) include:

- OMAS Mine Operations Manager, particularly in relation to the safe implementation of off-site activities during operation;
- OMAS H&S and Training Manager, particularly in relation to community safety and security management;
- OMAS Director External Affairs and Sustainability, particularly in relation to labour management.

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

Due to the nature of this Framework, a range of other external interfaces will be identified and developed. These are likely to include:

- Local neighbourhoods (as communities, and their representatives);
- Community-based organisations and non-governmental organisations;
- Local businesses;
- Local, regional and national government agencies and authorities (including local branch offices of National Employment Agency (ISKUR) and SME development Institute (KOSGEB));
- Donor and development agencies.

4 PROJECT STANDARDS

Applicable Standards must be complied with for all Project activities (the “Project Standards”). Project Standards comprise:

- applicable Turkish Standards;
- Turkish EIA requirements;
- other commitments to and requirements of Turkish Government authorities;
- applicable international standards and guidelines;
- applicable Centerra and OMAS standards, policies and procedures;
- other industry guidelines with which OMAS has committed to comply.

4.1 Applicable Turkish National Standards

None applicable.

4.2 Turkish EIA requirements

There are no specific requirements directly related to community development in the EIA and associated Permits submitted for the OMAS project.

4.3 Other Commitments to and Requirements of Turkish Government Authorities

None applicable.

4.4 Applicable International Standards and Guidelines

There are no specific requirements directly related to community development. This Framework seeks to support the broad community relations objectives of OMAS – in line with the broad requirements of the European Bank for Reconstruction and Development (EBRD) to avoid, minimise and mitigate Project-related impacts.

4.5 Applicable Centerra and OMAS Standards, Policies and Procedures

The OMAS Project has also developed a range of Policies and Procedures that define and support OMAS community development objectives. These include:

- OMAS Sustainability Policy (OMAS-HSEC-POL-002);
- OMAS Social Investment Policy (OMAS-HSEC-POL-004);

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

- OMAS Local Employment and Training Procedure (OMAS-HR-PRC-005);
- OMAS Procurement of Goods and Services Policy and Procedure (OMAS-FIN-PRC-001).

Key elements of each document are summarised below.

4.5.1 OMAS Sustainability Policy

The OMAS Sustainability Policy (OMAS-HSEC-POL-002) commits OMAS to undertake the following:

- To listen to and engage with host communities in a collaborative, transparent manner to build mutual trust and understanding.
- To work proactively with communities to identify and manage social risks, impacts and obligations.
- To help foster a stable, healthy and safe environment in which to live and work.
- To develop partnerships with host communities, governments, employees, contractors and others to promote sustainable social and economic development.
- To respect the fundamental human rights of all stakeholders with whom we interact.
- To manage grievances in a fair, timely and consistent manner.
- To take into account the special aspirations, needs and concerns of Indigenous Peoples, women, children and vulnerable groups within our sphere of influence.
- To leave a lasting positive legacy by working with local stakeholders to prepare for our eventual departure and the closure of our operations.
- To monitor and continually seek to improve our community relations performance in order to create value for our stakeholders and shareholders alike.

4.5.2 OMAS Social Investment Policy and Plan

The OMAS Social Investment Policy (OMAS-HSEC-POL-004) sets out the procedures and processes used by OMAS for social investment. The policy sets out the basic parameters for organisations, projects and locations to be eligible for consideration for financial support by OMAS.

The Policy states that eligible activities and organisations include:

- Organisations which offer their services for the benefit of and contribute to community wellbeing.
- Organisations which promote skills development to the benefit of the local community and/or the Republic of Turkey.
- Organisations which offer their services for the benefit of youth, the disadvantaged and/or the handicapped.
- Organisations which are credible, proven and registered.

Selected organisations are likely to be those:

- With previous experience of delivery of similar projects;
- With the capacity to manage and implement the proposed activities;
- With the technical capacity to support project implementation and to ensure successful implementation;
- Able to define clear and robust methodologies for the proposed activities to meet clearly defined objectives;

Community Development Framework

Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1
-------------------------------	-------------------------------------------	-----------

- Able to demonstrate the sustainability and self-sustaining nature of the proposed activities (i.e. that do not require ongoing financial or other support from OMAS for their continuing effectiveness);
- Set out synergies and proposed mechanisms for cooperation with other projects and development organisations.

Ineligible activities and organisations include:

- Any project which is the responsibility of the Government of Republic of Turkey.
- Non-identifiable organisations.
- Non-Turkish organisations.
- Individual personnel projects.

The geographic scope of the Policy is defined such that applications from the Republic of Turkey would be considered however priority would be given to Develi town and its districts.

4.5.3 OMAS Local Employment and Training Procedure

The OMAS Local Employment and Training Procedure (OMAS-HR-PRC-004) sets out the key objectives and processes by which OMAS will preferentially recruit workers from local communities.

Applicability

Settlements directly affected (Öksüt, Zile, Epçe, Tombak, Sarıca, Gazi, Gömedi, Yazıbaşı, Yukarı Develi, Çayırözü, Soysallı and Sindelhöyük) by the current activities of the company will have priority, followed by workers in the District (Develi) and then the Province (Kayseri) which is nearby to the project site. Turkish nationals will always be given priority over expatriates, who will only be used where their particular skills and experience cannot be supplied by Turkish nationals.

Opportunities for direct employment will be constrained by the availability of appropriate skills. Taking into consideration the skills limitation within the affected area, the focus of the employment strategy will be employment of the unskilled and semi-skilled workforce if necessary. The Project expects that:

- The vast majority (target of 100%) of the unskilled workforce will come directly from the affected settlements;
- A high proportion of the semi-skilled workers (target of 70%) will come directly from the affected settlements, the districts and the provinces.

Preliminary Employment Targets

Preliminary employment targets are as follows.

Table 2: Preliminary Employment Targets

Category	Settlements in the Project Area	District-Provincial (Develi-Kayseri)	Turkish Nationals
Unskilled	100%	100%	100%
Semi-skilled	70%	30%	100%
Skilled	-	50%	90%

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

OMAS will adopt a “tiered” approach to recruitment. Priority will be given to project affected settlements including Develi. If the required skill is not found here then workers in other adjacent districts and then within Kayseri Province will be targeted. If the required skills are not found in any of these then OMAS will search nationally and then internationally for suitably qualified and experienced staff.

Training Targets

In addition to levels of hiring, the company will support training for residents so they are better prepared for working at the project site. Below are the objectives and targets for the training programs.

Table 3: Preliminary Training Targets

Objective	Indicator	Target
To remove training barriers that may exist for local residents who want to work for the project	# training programs provided to impacted community residents	1 per year
	training completed vs. training planned	100%
To raise the skill level of local residents	# impact community residents trained for skilled positions	1 per year

Contractors will be encouraged by the Company to apply the same hiring procedures and operate in accordance with the Company’s Policies and follow all Turkish Labour Laws.

OMAS will adopt a long-term approach to the training and capacity-development of its workforce. While the project is of relatively short duration, OMAS will work with employees to ensure that individuals are prepared for mine-closure and that skills are transferable to other mining projects, or to other industries.

5 MANAGEMENT APPROACHES

5.1 Summary

Community development for OMAS comprises the development and implementation of a range of activities to ensure that local communities are provided with opportunities to benefit from the presence of the Project and that the negative socio-economic impacts of the Project are minimised. This is particularly important given the short life of the Project, and a key focus will be to ensure that dependencies on the Project are not established during operations that will lead to significant adverse impacts upon mine closure.

5.2 Objectives

The objectives of this Community Development Framework are to:

- maximise the positive long-term impacts of the Project on local communities;
- help local communities and businesses to minimise the negative impacts of mine closure by minimising dependence on the Project.

The Community Development Framework provides a holistic framework to coordinate activities across a wide range of activities and throughout all phases of the Project mine life. This will include:

- Long-term economic development through increased economic opportunities for income and employment creation;
- Vocational skills and capacity-development;
- “Quick impact” public infrastructure investment.

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

5.3 Principles

The following principles will be adopted by OMAS to support implementation of this Community Development Framework:

- **Focus on the settlements of greatest impact** for investment and support (Öksüt, Zile, Epçe, Tombak, Sarıca, Gazi, Gömedi, Yazıbaşı, Yukarı Develi, followed by Çayırözü, Soysallı and Sindelhöyük and then Develi District).
- **Community participation** – *muhtars* and other community representatives will be involved in decision-making.
- **Self-sustaining projects** – the focus will be to minimise expenditure on big capital projects, concentrating on projects with one-off expenditure, long-lasting impacts and no demand for ongoing expenditure by OMAS to sustain the proposed activity.
- **Encourage partnership and co-investment** – with national/international organisations.
- **Encourage community ownership** – seek to minimise dependency by avoiding projects that require ongoing investment by OMAS for enduring viability.
- **Inclusiveness** – ensure that all community members will have access to benefits arising from the overall community investment “portfolio”.

In addition to the above principles, the following additional criteria will be used to assess the appropriateness of proposed activities and investments:

- **Needs based** - Projects must be designed in consultation with communities and other stakeholders experienced in community investment and development in Turkey and the Kayseri region. The intention being to focus on real needs and root causes of socio-economic issues not simply the wishes of community representatives and local authorities.
- **Build on existing structures and capacities** - use the corporate presence of OMAS to increase the leverage of proposed projects to maximise benefits and impacts.
- **Transparency** – ensure that all projects have effective control and oversight mechanism and are open to internal and external scrutiny.
- **Prevention of duplication** - In selecting projects, avoiding duplication of the efforts of other organisations, international and local agencies or government departments. However, leveraging opportunities with existing programmes and co-operating with existing organisations is acceptable and desirable. Ensuring shared common goals so that the interests between the communities, the government and the company are aligned.
- **Measurement** - Identifiable targets and quantifiable measures of project effectiveness.
- **Local implementation** - Encourage, as far as possible, the implementation of community development projects to be managed by local NGOs and CBOs or other local development consultancies, allowing for transfer of experience and capacity building and hand-over of long-term deliver to these organisations.
- **Cost-effectiveness** – comprehensive, well thought-out budgets offering value for money.
- **Exit planning** – ensure that all projects have an exit plan from the outset so that OMAS does not incur long-term or recurring liabilities.
- **Vulnerable groups** – ensure that vulnerable groups are prioritised in receiving positive benefits from projects.

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

- **Core competencies** – focus activities on priority areas where OMAS and its implementation partners have skills and experience.

5.4 Approach

OMAS will develop a long-term community development strategy focused on closure from the outset. The objective will be to ensure that investment and support by OMAS is focused on building the economic resilience and diversity of local communities so that at mine closure there are not the significant dislocations in local economies that often accompany mine closure.

Given the small size and short duration of the Öksüt project, OMAS will seek to coordinate the implementation of the community development strategy using its internal resources. Third parties (CBOs, NGOs etc.) will be used as implementing partners for the specific investment projects. Third parties may also be engaged to undertake monitoring and evaluation of the effectiveness of individual projects and of the overall community development strategy.

5.4.1 Key Actions

To do this, OMAS will undertake the following actions:

- Work with local *muhtars* and Government representatives to identify local community development needs and priorities;
- Integrate local employment and local procurement plans with local community development needs to identify the likely dependencies or areas of over-reliance on OMAS by local communities;
- Identify other complementary business and employment activities that can be undertaken by local communities and identify community-based organisations which could provide support in implementation by local communities;
- Develop an operations-phase Community Development Plan to coordinate Social Investment, Local Employment and Local Procurement based around common objectives and principles;
- Develop a Social Closure Plan as part of the overall mine closure planning that builds on the knowledge base developed;
- Develop a monitoring programme related to community development to enable tracking of investment, dependencies and outcome effectiveness.

5.4.2 Proposed Themes for Community Development

A number of initial themes are proposed for the Community Development Plan. These will be evaluated and used as appropriate within the operations-phase Community Development Plan and Social Closure Plan.

Table 4: Proposed Themes for Community Development Expenditure

Theme	Likely Components
Education & Training	<ul style="list-style-type: none"> • Supporting existing vocational training centres • School support (but not to replace activities and investment by the Government) • Scholarships • Business skills and SME support training • Job-readiness training for OMAS (but recognised trades that are transferrable)
Public Health	<ul style="list-style-type: none"> • Link to CHSS Management Plan with road safety • Water supply

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

Theme	Likely Components
	<ul style="list-style-type: none"> Waste management
Agriculture	<ul style="list-style-type: none"> Training and skills development (in cooperation with Agricultural Directorate)
"Quick impact" community projects	<ul style="list-style-type: none"> Community projects (might be "high impact" but small scale capital projects, such as school renovations) Such projects will be capped at 10% of the overall community development budget

Note that the thematic areas and type of projects presented in Table 1 above are indicative and will be revised after the detailed needs assessment process which will be undertaken in 2016.

5.4.3 Planning Framework

A three-year planning framework is proposed for community development planning. This provides a medium-term perspective to enable objectives to be met even if expenditure is re-allocated from year to year. A medium-term horizon also helps to reduce the annual planning/approval hiatus that can occur, and this is particularly important for such a short mine life project.

The Community Development Plan will set out monitoring and evaluation of activities implemented under the plan to track progress and lessons learned.

5.4.4 Governance

The Community Development Plan will be directed by a Steering Committee comprising OMAS and local community representatives. Key elements of the proposed approach to governance include:

- The Steering Committee will be guided by an agreed terms of reference that separates financial allocations and decision-making from delivery;
- The Steering Committee will approve the three-yearly and annual plans and reports;
- The Steering Committee will be accountable to local communities through the participation of *muhtars*;
- Other community representatives will be selected based on the recommendation of OMAS who have either a particular standing in a neighbourhood or who have relevant skills or experience;
- The outcomes of meetings will be publicly disclosed.

The Steering Committee will be responsible for the selection and oversight of projects, but OMAS will be responsible for all aspects of budgeting and financial management.

5.4.5 Investment/Selection Criteria

Investment selection and priority-setting will be informed by the ESIA and also by the community development needs assessment (to be prepared). Priorities may evolve based on the results of ongoing monitoring.

While criteria and priorities will be defined by the Steering Committee, criteria are likely to include:

- Address one of priority investment themes (see below).
- Self-sustainability.
- Enduring impacts.
- Limit dependency on OMAS.

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

- Support vulnerable groups.
- Proportionality (i.e. communities with greatest impact get greatest investment).
- Leverages/facilitates action by other organisations.
- Link to National & Regional Development Plans.

5.4.6 Community Disclosure

The Steering Committee and OMAS will report on progress to affected communities at periodic community meetings. OMAS will include an update on Community Development activities on its website.

6 IMPLEMENTATION SCHEDULE

6.1 Review and Revision of this Framework

This Framework and the subsequent Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During steady state operations, this Management Plan will be reviewed on an annual basis (unless otherwise indicated) and any necessary revisions made to reflect the changing circumstances or operational needs of OMAS. Revision of this Framework will be the responsibility of the OMAS Director External Relations and Sustainability, who is custodian of this Framework.

If material changes to operating procedures are required (as identified through the Management of Change procedure contained within the OMAS ESMS Framework) this Framework may be updated on an “as required” basis.

Any revisions to this Framework will be uploaded to the OMAS Document Control Centre to ensure that all OMAS staff have access to the latest version of this Framework.

6.2 Key Implementation Milestones

Key implementation milestones related to this Framework are:

- Undertake Community Development needs assessment (based on social baseline and further engagement with community members, Muhtars, other community representatives, sub-Governors, Governorship, ISKUT, KOSGEB, Regional Development Agency, other development organisations seeking to build the capacity of Kayseri region to deal with refugee influx etc.) –2016;
- Prepare Community Development Plan – Q3-Q4 2016.

Based on the Community Development needs assessment, detailed budgets will be allocated and the overall budget will be set out in the Community Development Plan.

7 MONITORING

7.1 Overview of Monitoring Requirements

Monitoring measures will be set out in the Community Development Plan and are not provided in this Framework.

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

7.1.1 Management Reporting

The OMAS Director External Relations & Sustainability will be responsible for the overall design and implementation of the Community Development Plan.

The OMAS Community Relations Manager will provide additional support and will also supervise and monitor the implementation of the Community Development Plan.

Implementing partners for community development projects are required to submit project progress and financial reports on a periodic basis (monthly, quarterly as appropriate and defined in project agreements).

Management and reporting will follow generally accepted practices and be in line with OMAS management reporting procedures as defined in the ESMS Framework.

7.1.2 Progress and Performance Reporting

A quarterly progress report will be prepared for submission to the Steering Committee and OMAS General Manager.

An annual progress report will be prepared for public disclosure.

7.1.3 Monitoring and Evaluation of Community Development Projects

A common methodology will be applied across all Community Development projects supported by OMAS and which are implemented by a range of different partners.

Monitoring and Evaluation (M&E) is an essential part of project management and stakeholder engagement. It helps the Project understand project progress, by learning from achievements and problems, and agreeing practical ways of how to improve both strategy and operations. The main functions of M&E are to ensure improvements through evaluation of performance, to maximise the impact of each Community Development project, and to demonstrate that the impact is as anticipated and, if not to assess the impact of the project.

M&E activities are aimed at defining the extent of impact positive or negative, intended or unintended – on the lives of the project participants. Reporting, monitoring and evaluation of CD activities will follow a similar approach as outlined below:

- **Implementing partners will be required to submit monthly reports to OMAS** in accordance with an agreed format. In general, the monthly report will be comprised of two sections:
 - A quantitative section, which reports on progress in achieving targets. The targets are indicators of having achieved certain defined activities. Achievement of the activities relates to specific project outputs. This will follow the basic log-frame concept.
 - A narrative summary, which addresses any issues encountered, actions taken to resolve the issues during the month, any unresolved issues, and a financial summary section explaining actual spent versus planned budget. The monthly report will be used to track progress against a set of agreed indicators and to track any issues arising in implementation.
- **A quarterly or bi-annual report will also be supplied** at the end of each calendar quarter or every six months. This report will mainly comprise the following sections:
 - A narrative section summarising the issues and actions of the monthly reports.
 - A summary of activities that are reported on a quarterly basis only, such as detailed training records, financial reporting, leveraged/matched funds in cash or in kind and any major issues, actions taken or planned, lessons learned, requests for assistance.
 - A summary of planned activities for the forthcoming quarter.
- This reporting may be used as a basis for discussions with the respective Steering Committee members and OMAS/Centerra senior management on overall programme implementation.

Community Development Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CD-PLN-0001	Rev: 1

7.2 Key Performance Indicators

Key Performance Indicators will be set out in the Community Development Plan and are not provided in this Framework.

Each Community Development project will require a baseline status assessment, mid-term evaluation and ex-post evaluation. M&E indicators will be determined and stakeholder participation in data collection and assessment will be defined in individual project agreements.

A mid-term and ex-post evaluation will be carried out of each Community Development project by OMAS. Depending on the result, activities may be adjusted after the mid-term evaluation if it is considered by the Steering Committee and OMAS that this will help to achieve stated project goals. The ex-post evaluation will be used to evaluate the overall effectiveness of each project and the long-term impact of each project.

8 TRAINING

All employees of OMAS and Contractors to OMAS are provided with basic training on community relations, including general awareness training and induction in Code of Ethics Policy (OMAS-GEN-POL-001).

9 AUDIT AND REPORTING

9.1 Auditing

Auditing requirements will be set out in the Community Development Plan.

Conformance will be monitored in accordance with Component 11 of the ESMS (Monitoring and Evaluation).

All incidents and non-conformances identified will be reported as per the requirements of the OMAS ESMS as described in the ESMS Framework Document (OMAS-ESMS-001).

9.2 External Auditing

Conformance with this Framework will be subject to periodic assessment as part of the Centerra audit programme and separately by Project Lenders.

9.3 Record Keeping

Records of audits, inspections and incidents will be managed in accordance with OMAS procedures.

10 DOCUMENT CONTROL

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