Delegations are kindly invited to use this template to share their comments on any of the draft country programme documents being presented to the Executive Board during the second regular session.

Delegation name: **United States of America**

Draft country programme document: **Turkey**

In accordance with Executive Board decision 2014/1, country programme documents are considered and approved in one session, on a no-objection basis. All comments received by the Office of the Secretary of the Executive Board before the deadline will be made public on the Executive Board website, and considered by the respective regional office, in close consultation with the country office and the concerned Government.

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| **General comments** | We note several developments over the last year that place this into some context, including in bold those things we see as chief challenges:  
  **Education**  
  - The number of Syrian refugee children included in formal education reached 684,728 (63.3%, 89.3% in primary school) as of December 2019, representing an increase of 6.5% by comparison with the 2018-19 school year and 39% with the 2016-17 school year (only approximately 36% of the school-age refugee population was enrolled in school in 2016)  
    - UNICEF contributed to these improvements through: managing Conditional Cash Transfers in Education (CCTE), training Turkish teachers (including teaching Turkish as a second language training), providing learning spaces and supplies, community based outreach teams, and support for Syrian Volunteer education personnel (paid for by Germany) who have an |                |
increasingly sophisticated role in the education system.

- Integration into the national school system continued to accelerate, with 96% of refugee children attending Turkish public schools.
- **Despite this significant progress, about 400,000 Syrian refugee children, particularly adolescents, remained out of school.**
- The number of children benefiting from the extension of the CCTE to refugees rose from 410,740 in December 2018 to 562,016 in December 2019, with the program now covering 80% of all refugee children in school.
  - Separately, the child protection component of the CCTE program reached 18,844 children, of whom 1,654 were referred to specialized services.
- The Accelerated Learning Program (ALP), which provides certified learning opportunities to out-of-school refugee children, continued to expand. Between the launch of the program in 2018 and the end of 2019, 17,492 children (47% girls) have benefited from the program.
- By the end of 2019, 11,937 children (8,275 aged 6-13 and 3,662 aged 14-17), 47% of them girls, had benefited from UNICEF-supported language courses in cooperation with the Ministry of Youth and Sport.
- Efforts continued to strengthen the capacities of counseling and research centers (RAM) to improve the quality of special education and counseling provided to children with special needs in schools. A total of 732 Turkish counsellors and 170 Syrian volunteer education personnel received training, public awareness seminars were held.

The CPD emphasizes inclusive education across both Outcome 1 and Outcome 2. As mentioned in para 30, this will include support to the Ministry of National Education to address the multiple and intertwined barriers impacting school enrolment, attendance, performance and completion, which are often protection-related, and strengthen the protective learning environment for the most vulnerable children. There is also an emphasis on out-of-school and at-risk children throughout the document, with access to a form of learning for refugee children included as a key area of work under indicative outputs 1.2, 2.1 and 2.2.
Protection

- UNICEF support for case management processes contributed to the identification, assessment and planning of individual support for 78,199 children, of whom 37,237 were referred to specialized services and legal counseling. A total of 4,063 children with disabilities (1,687 girls; 2,376 boys) benefited from multi-disciplinary services.
- The results of the 2018 Turkey Demographic and Health Survey were published, providing important new information on women and children in Turkey. Data on the Syrian refugee population and on young childcare and development were obtained for the first time.
  - The Survey confirmed that child marriage remains a challenge in Turkey. According to the survey, 14.7% of Turkish women aged 20-24 had married before turning 18 – unchanged from 2013 – while 2% had married before turning 15. This first nationally representative data on child marriage among Syrian refugee women showed disturbingly high figures, with 44.8% of Syrian women aged 20-24 in Turkey having been married before turning 18, and 9.2% before turning 15 years old.
  - Among Syrians under temporary protection, the survey puts the infant and under-five mortality rates at 22 and 27 per thousand live births respectively, while mortality among Turkish children rates was 9.3 and 11.4 per thousand live births.

These high levels of child marriage are indeed concerning and will be addressed during the country program through a focus on social norms change among adolescents and their families and communities, as described in para 32. Additionally, as mentioned in paras 34 and 35, the focus on improving the quality, coverage, and integration of social assistance and child protection services under Outcome 3 will also contribute to addressing the socio-economic vulnerabilities that contribute to perpetuate this harmful practice.

UNICEF will support the Ministry of Health to monitor and address disparities in health outcomes for specific groups of young children, including refugees, as per para 24(d).
<table>
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<tr>
<th>Births</th>
<th>The rate of stunting (low height for age) was 17.4% among Syrian children under five.</th>
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<td>Surveys conducted to monitor the Emergency Social Safety Net (ESSN) for Syrian refugees found that 11.7% of ESSN beneficiary refugee households were living in extreme poverty while 59.18% were living in moderate poverty.</td>
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**Labor**

- 850 MoFLSS labour inspectors were trained, 90% of the total national number of inspectors in countering child labor procedures.

**Health**

- UNICEF provided 91 Vaccine Tracking System packages to help increase vaccination rates among refugee children. Turkish and Syrian health professionals working in primary health care were trained to promote positive infant and young child feeding practices among vulnerable groups, including...
refugees, and 20 training modules were updated.

| Comments on specific aspects of the country programme document | We have generally found UNICEF to be responsive to the changing needs of the Turkey context. This draft country program document seems to treat COVID-19 bit in passing. We will assume that this plan was months in the making, and COVID-19 was a late addition to the text.  

60% of young Syrian children had received all age-appropriate vaccinations compared to 98% among Turkish children in 2018 according to the MoH.  

We believe that the diversion of resources to COVID-19 related needs has taken significant attention away from child and maternal health and suspect the percentage of children 0–11 months vaccinated with three doses of diphtheria, tetanus and pertussis (DTP)-containing/Pentavalent vaccine nationally has probably been setback.  

We would like to see aggressive action to make up the ground here and see that included in this plan. | Noted. Indeed, lower than optimal vaccination rates are a concern, particularly in light of the COVID-19 pandemic and its potential impact on the uptake of maternal and child health services. Strengthening demand for vaccination services and ensuring wider coverage of young children, particularly among vulnerable groups such as refugees, is part of the strategic approach being considered with the Ministry of Health and will be addressed under indicative output 1.1. |