

A CONSIDERATION OF REFUGEE INTEGRATION MANAGEMENT IN
TURKEY WITH RESPECT TO MULTI-LEVEL GOVERNANCE APPROACH

Munira MOHAMMED
Master of Science Thesis
Eskişehir 2022

Eskişehir Anadolu Üniversitesi

Sosyal Bilimler Enstitüsü
Eskişehir 2022

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Munira MOHAMMED
İşletme Anabilim Dalı
Yönetim ve Organizasyon Bilim Dalı

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Danışman: Prof. Dr. Sülymen SÖZEN

ÖZET

ÇOK DÜZLEMLİ YÖNETİŞİM ÇERÇEVESİNDE TÜRKİYE’DE MÜLTECİ ENTEGRASYON YÖNETİMİNİN DEĞERLENDİRİLMESİ

Munira MOHAMMED

İşletme Anabilim Dalı

Yönetim ve Organizasyon Bilim Dalı

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Danışman: Prof. Dr. Süleyman SÖZEN

Son yıllarda, yönetim, göçmen entegrasyonuna yönelik çalışmalarda çok önemli bir kavram haline gelmiştir. Mülteci entegrasyon politikalarının geliştirilmesi ve uygulanmasının çok düzlemli yönetim perspektifinden incelenmesi, göç literatüründe önem kazanmıştır. Türkiye’nin dünyada en fazla sayıda mülteci ve sığınmacıya ev sahipliği yapan ülke konumuna gelmesi nedeniyle mülteci uyumu konusu ülkenin önemli bir gündem maddesi haline gelmiştir. Göç ve entegrasyonla ilgili literatürdeki son eğilimlerle uyumlu olarak bu çalışma, mülteci entegrasyon politikaların geliştirilmesi ve uygulanmasını çok düzlemli yönetim yaklaşımı açısından ele almaktadır. Bu çalışmada öncelikle mülteci entegrasyonu ile ilgili yasal ve kurumsal düzenlemeler açıklanmış. Uyum sürecinde devlet kurumları yanında sivil toplum kuruluşları ve diğer devlet dışı aktörlerin bu süreçteki rolleri üzerinde durulmuştur. Üniter devlet yapısı ve son derece merkeziyetçi hiyerarşik bürokratik yapısı nedeniyle Türk kamu yönetimi sistemi sivil toplumun etkin katılımını sağlayacak mekanizmaları ve işbirliği araçlarını geliştirmede zorlanmaktadır. Ayrıca son yıllarda sivil toplum kuruluşlarının sayısı artmış olsa da Türkiye’de güçlü bir sivil toplum geleneğinin olduğunu söylemek de güçtür. Sivil toplum ve bireyci unsurların devlet karşısındaki zayıflığı da işbirliğine dayalı düzenlemelerin geliştirilmesinde ve devlet dışı aktörlerle etkin ortaklıklar kurulmasında bir başka kısıtlama olarak görülebilmektedir.

Anahtar kelimeler: Çok düzlemli yönetim, Mülteci entegrasyonu, Sivil toplum kuruluşları, Türkiye

ABSTRACT

A CONSIDERATION OF REFUGEE INTEGRATION MANAGEMENT IN TURKEY WITH RESPECT TO MULTI-LEVEL GOVERNANCE APPROACH

Munira MOHAMMED

Department of Business Administration

Programme in Management and Organization

Anadolu University, Graduate School of Social Sciences, January 2022

Adviser: Prof. Dr. Süleyman SÖZEN

In recent years, governance has become a crucial concept in the study of political responses to immigrant integration. Studying the development and implementation of refugee integration policies in terms of multi-level governance perspective has become a prominent feature in the field of immigration literature. In line with recent trend on literature on migration and integration, this study argues that developing and implementing refugee integration policies is a multilevel policy issue and need to be investigated in terms of multi-level governance approach. This study takes Turkey as a case to study the way to manage refugee integration in the light of a multi-level governance approach, because Turkey is still one of the largest refugee hosting regions in the world. This study explains development and implementation of refugee integration policies and existing structures in Turkey. The study reached several conclusions, including that due to its unitary state structure, strong state tradition and highly centralized bureaucratic structure, it is difficult to say that Turkish public administration system has the mechanisms to ensure effective participation of the civil society. Moreover, it is also difficult to say that there is a strong civil society tradition in Turkey even though the number of non-governmental organizations has increased in recent years. The weakness of civil societal and individualist elements vis à vis the state can also be seen another constraint in developing collaborative arrangements and establishing effective partnerships with non-state actors.

Key words: Multi-level governance, Refugee integration, Civil society organizations, Turkey

ACKNOWLEDGEMENT

Academic life is a long and grueling journey with ups and downs. However, the master process was one of the most important steps in my life, I must admit that this is not a road I walked in alone. For this reason, I would like to reveal my appreciation to everyone who contributed to this process and helped me complete my master's successfully. Firstly, I would like to thank my esteemed thesis supervisor Prof. Dr. Süleyman SÖZEN, I will always be beholden to you for your encouragement and guidance. It would be absurd to count all the ways that you've supported me in my thesis, and for being a good mentor, and for guiding me to the right direction. I only hope I can return the favor someday in the near future. Thanks. I would like to thank my beloved spouse for being the reason behind my success, and for taking care of me beyond my dreams and expectations. who stood by me when I was struggling, tired, and gave up, for believing so much in me and my ability to make it true and whose existence I thank every day, to my dear daughter Mira for being a part of my this journey. There's no bond stronger than family. Thank you for always supporting me, even when it is not easy to do so. Without you, I could not pass through these hard times.

Munira MOHAMMED

DECLARATION OF COMPLIANCE WITH ETHICAL PRINCIPLES AND RULES

This thesis belongs to me, original work; I behaved in accordance with scientific ethical principles and rules in every stage of my research, including preparation, data society, analysis, and presentation of information; that I have cited all data and information obtained within the scope of this research and that I have included these sources in the bibliography; I declare that this research has been scanned with the "scientific plagiarism detection program" used by Anadolu University and that it does not "contain plagiarism" in any way. I hereby declare that I accept all moral and legal consequences that may arise in the event of any violation of this statement regarding my work being detected.

Munira MOHAMMED

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S/N Abbreviations

1	AFAD	Disaster and Emergency Management
2	CSOs	Civil Society Organizations
3	DGMM	Directorate General of Migration Management
4	EU	European Union
5	INGOs	International Non-governmental Organization
6	IOM	International Organization of Migration
7	LFIP	Law on Foreigners and International Protection
8	NGOs	Non-governmental Organizations
9	NRIF	National Refugee Integration Forum
10	OECD	Organization for Economic Cooperation and Development
11	RCOs	Refugee Community Organizations
12	TBMM	Türkiye Büyük Millet Meclisi (Grand National Assembly of Turkey)
13	TP	Temporary Protection
14	UNHCR	United Nation High Commission of Refugees

1. Introduction

Migration is one of the oldest phenomena that have emerged for thousands of years which accompanied the developments of the simple life of human beings. From past to present, political and socio-economic developments in world history have left significant effects on societies of various regions and countries. In other words, migrations are a constant aspect of human history. In today's world, refugee crisis remains a huge problem. The problem is proven by figures, in 2015, the highest number of displaced persons was recorded since the end of World War II. Approximately 60 million people have been displaced as refugees or internally displaced persons worldwide. Forced displacement is often protracted and unresolved. As the conflicts that have caused the largest refugee flows come to an end, it is becoming increasingly obvious that to respond to long-term nature and socio-economic impacts of this global crisis both humanitarian and developmental interventions responses must be merged. "Displaced populations" refer to refugees who flee to escape crisis by crossing recognized international borders; and internally displaced persons, who flee but remain within the borders of their own country.

The 1951 Refugee Convention defined a refugee as someone who has been forced to flee his or her country of origin due to fear of persecution, war, or violence (*What Is a Refugee? Definition and Meaning* | USA for UNHCR, n.d.).

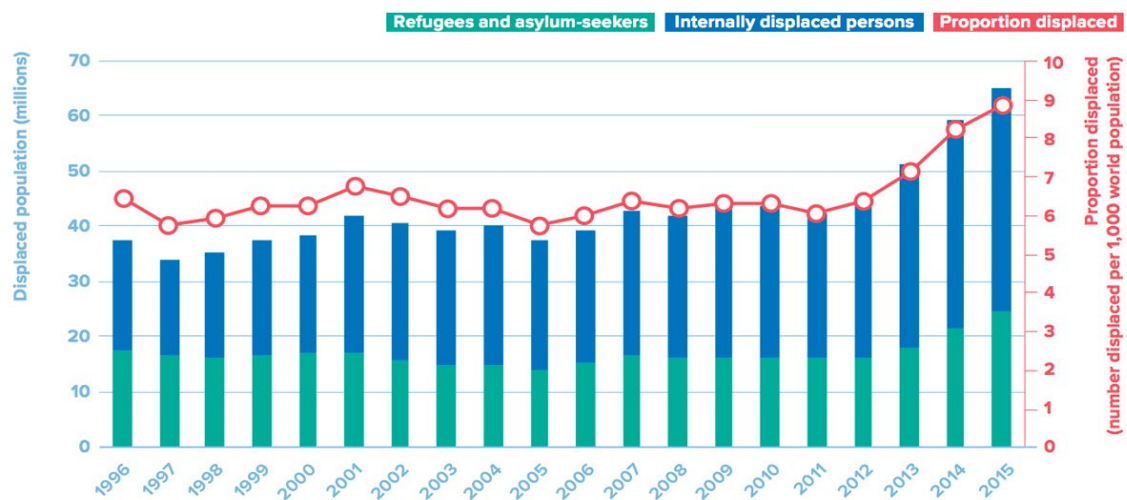


Figure 1: Trend of global displacement from 1996 to 2016
Source: UNHCR Website January 2017

A refugee has a well-grounded fear of persecution for reasons related to race, religion, nationality, political affiliation and/or opinion, or membership in a particular social group (Refugees, n.d.-a). This Convention is considered as the prime legal document that configures the essence of work on refugee matters. Endorsed by more than 140 state parties, it defines the term ‘refugee’ and outlines the rights of the displaced, as well as it lays down the least acceptable standards for the treatment of refugees, without prejudice to states granting more favorable treatment (United Nations, 1951).

Such rights include access to the judicial system, to primary education, to work, and the provision of identification documents, including a refugee travel documents in the form of passports. Through the past couple of decades, the world’s population of forcibly displaced persons of concern has grown tremendously from 33.9 million in 1996 to 65.6 million in early 2016, and it remains at a record high turning this into the biggest humanitarian crisis in history (See Figure 1).

The understanding of migration policies is important for hosting countries and institutions that assist and provide humanitarian aids for migration. The international refugee system has been going through the obvious interchange. Because of the politicization of refugee systems and international protection mandates since the 1990s, national legislation has become strict and state security and sovereignty have become more important than refugee protection. Because of the refugee crises such as in Iraq, Somalia, and Haiti, the international response has shown that hosting countries and international organizations in the term of receiving refugees have adopted a new paradigm in the international refugee system by replacing containment overprotection and temporary solution with durable solutions.

In the past years, the cost of wars in the Middle East has been heavy and many demolitions have occurred. Turkey has been an attractive destination for immigrants due to its crucial location on international migration routes as well as its being the bridge between Asia, Africa, and Europe. In 2014, Turkey was among the highest refugee hosting countries globally, hosting approximately 1.5 million refugees from Syria, Bangladesh, Afghanistan, Iran, and Iraq constituting about 3.4 percent of the entire Turkish population. Nevertheless, Turkey is considered an attractive country for refugees due to its geographical location.

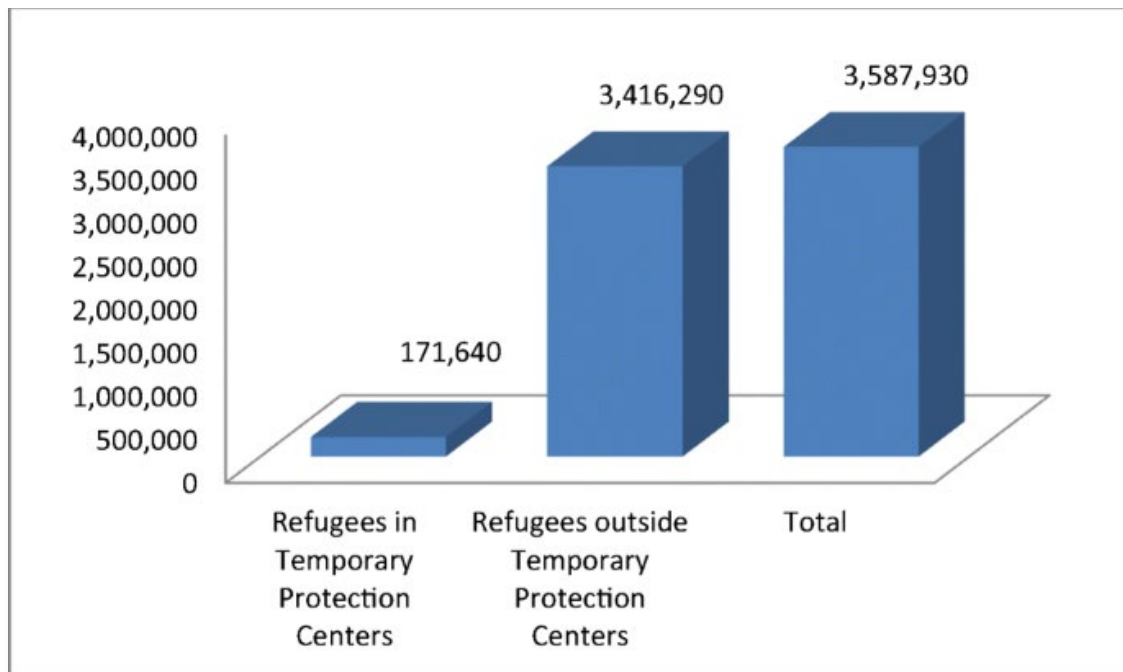


Figure 2 The number of Syrian refugees in and out of temporary protection centers in Turkey. Source: DGMM (2018, October 5)

However, asylum to Turkey faced a lot of changes due to the Syrian revolt in 2011, when the first 252 people came to Turkey from Syria as refugees, and due to the aggravation of the civil war in its neighboring country Syria, the refugee's influx increased day after the day searching for a shelter and protection in the refugee's camps in Turkey. Turkey's "open door" policy that has been implemented within the framework of "temporary protection regime" lend a hand to increase the flow of refugees to Turkey. Considering the foreign/immigrant population in Turkey, it is seen that this number has increased in recent years. Figure 2 highlights the number of refugees under "Temporary Protection" (TP), in and outside the camps. In accordance, with the statistical data of the General Directorate of Migration Management dated 13 September 2018; There are 716,816 registered foreigners in Turkey. According to 2017 data, 112,415 people are under international protection; As of 2018, 3,559,262 people were also officially registered under temporary protection status.

Therefore, official statistics show that the number of registered Syrian individuals under temporary protection alone is approaching 4 million, excluding Afghans, Iranians, Iraqis, Somalis, and other foreigners living in Turkey under international protection.

Syrians have a special immigration status: they are under temporary protection and this status gives them important rights; but at the same time, as the name suggests, this state of impermanence also leaves them in a state of uncertainty. These include those who have submitted their applications for asylum in one of the Western countries and those who intend to stay in Turkey until their application process is accepted. In this context, temporality, refugees' integration, and discussions on migration policies become an important policy issue. (*Refugees and Asylum Seekers in Turkey*, n.d.).

Turkey's open-door policy is mainly a result of having borders with several politically unstable countries and a route for international migration. As well as being a part of the organization of Islamic cooperation and Arab Nation, Turkey receives a vast influx of refugees. Neighboring war-affected countries require a lot more than a short-term emergency solution they also a recognition of the long-term economic, social, and political responsibility of supporting these community.

Handling the refugee crisis at the moment is not confined to just halting the influx of refugees and reversing their movement, but also requires practical well-articulated measures aimed at providing refugees with better settlement and integration opportunities. Well-established, comprehensive integration policies as well as administrative tools are essential to cater for migrants, in order to provide basic immediate assistance such as the access for education, health, and housing as well as the most important thing which is access for documentation and work permits. In this term different actors such as civil society organizations (CSOs), non-governmental (NGOs), international non-governmental organizations (INGOs) as well as Turkish government play a critical role in refugee integration process.

Since these flows and the fact that the period of stay of Syrian refugees did not become temporary because Turkey considered that by the end of the war the Syrian refugee will return to their country, but millions of Syrians being under temporary protection and lives in Turkey therefore Turkey facing many challenges and the situation became difficult for Turkey, as they live a unique experience in the context of the migration process, in addition that the issue of Syrian refugees problem is "not to stay or go" any longer furthermore the crisis of Syrian refugee became a hot topic in both political

and social arena. Because of these unexpected influxes, the temporary protection regime for Syrian refugees promotes problems in different aspects.

The most prominent of them was the increase in xenophobia and the informal working conditions. The number of refugees who work informally in agriculture, construction, textile industry, small enterprises and factories in Turkey has risen by about 650,000 employees, and the local population is also uncomfortable with the fact that Syrians are benefiting from many services such as health and education.

One reason for this hostility is the increased informal employment of refugees. Residents complain that they are unable to find work due to the increase in informal employment of refugees. Turkey faced a huge social, economic and political challenges. Thus, refugee integration has emerged as a vital issue in order to avoid facing negative consequences.

Turkey has begun to adopt new policies in terms of refugee integration. Nevertheless, refugee integration is a complex, multidimensional, and multilevel process. For successful integration is influenced by various factors hence the Turkish government, international and national organizations play a critical and active role in the process of integrating refugees into the society.

1.1 Rational/Justification

In recent years, with the huge influx of Syrian refugees, Turkey has transformed from a country of emigration to a transit and a host country. In fact, at the start of the Syrian civil war, Turkey considered the crisis as a temporary issue and implemented “open door policy”. This is because when the conflict ended, the Syrians would return to their home. However, the conflict has not been resolved yet and refugee crisis has become a crucial issue. Now, more than 4 million Syrians are living in Turkey. Today, as hosting the highest number of Syrian refugees, Turkey has been facing serious economic, social and political challenges. For refugees, they are vulnerable to exploitation and poor livelihood conditions, lack of health insurance and absence of work permits could place them further at risk. Such circumstances might force them either to transfer to negative coping mechanism (such as begging, prostitution, etc.) or simply ending up at court.

This situation makes the integration of refugees among the most pressing issue in Turkey's policy agenda. In other words, the integration of refugees has become a very important issue in the face of the problems connected with the intensive influx of refugees from Syria to Turkey. In this respect, academic studies dealing with refugee integration and related issues become much more important. This thesis aims to contribute to the existing literature.

1.2 Importance and Objective of the Study

There is no doubt that with successful integration policies, refugees can make meaningful contributions to the host country. On the other hand, unsuccessful integration policies can lead to serious social, political and economic problems. For Turkey, there is an urgent need to integrate refugees successfully in order to avoid negative consequences.

It should be noted that immigration and refugee integration issues are not only Turkey's problem but it is a global issue and hot topic all around the world. As a result, academic research community has been carrying out many studies related to immigration and refugee integration issues. In this respect, a growing interest on the governance of immigrant integration is recognized (Schiller, 2018).

In recent years studying the evolution and execution of the refugee integration policies in terms of multi-level governance perspective has become a prominent feature in the field of immigration literature. In line with the literature, the main purpose of this thesis, therefore, is to examine Turkey's integration policies and existing structure from the perspective of multi-level governance.

In other words, this study aims to explore the relevance of multi-level governance approach, regarding refugee integration policies, to the Turkish context. In doing so, Turkish politico-administrative system on one hand, internal and international dynamics on the other hand, are taken into consideration.

Moreover, while there is a growing body of policy-oriented research pointing out various aspects of the Syrian refugee crisis in Turkey, studying governance structure remains largely under studied. This thesis, therefore, aims to fill this gap.

There are also practical reasons in carrying out this study. One of them is to draw lessons from other countries' experience in the development and implementation of refugee integration policies. The other one is to inform policy-makers with relevant theoretical developments and put forward some suggestions.

1.3 Research Objectives

1. To explore multi-level governance which has become increasingly prominent in the field of migrant integration.
2. To examine Turkey's integration policies and present structure within the context of multi-level governance approach.
3. To discuss the relevance of multi-level governance approach to the Turkish context and draw some lessons for successful integration.

1.4 Methodology

Current trend in refugee integration literature indicating the importance of governance approach including multi-level governance, network governance and collaborative governance. One important aspect of governance approach is that governance constitutes actors not only from public but also private, voluntary and community sectors (OECD, 2019).

Multi-level governance has been adopted, especially by EU and global institutions (such as the World Bank), as a benchmark for good practices in policy formulation and implementation. Later on, the concept of multi-level governance was employed to other fields including immigration and migrant integration field.

In line with recent trend on literature on migration and integration this study argues that developing and implementing refugee integration policies is a multilevel policy issue and need to be investigated in terms of multi-level governance approach.

2. Literature Review

Dromgold and Michelle conducted a qualitative study in 2015, the study analyzes the legal framework of the inclusion and exclusion of Syrian refugees in the Turkish society from different angles. Despite the legal status of temporary protection seems to be a benevolent governmental response to the mass influx of refugees, operationalization of these policies and the provision of access to these basic rights and services is extremely challenging. Legally, Syrians in Turkey have access to all basic services including shelter, food, health, education, and legal employment.

However, knowledge of and access to these rights is not sufficient to fulfill the basic needs of the estimate 2.5 Syrians across the country. Although these rights are legally stipulated, the dissemination of information for Syrians' residing in urban settings is very poor remains insufficient. The study reveals that in addition to struggle earning money to provide for their basic needs, Syrians additionally face subtle and direct discrimination from Turkish citizens and exclusion from Turkish society that reinforces the perception of Syrians as the 'other.' Four years ago, Syrians were welcomed into Turkey as 'guests.' Now they are granted rights under the legal status of temporary protection.

The study states that Syrians are increasingly normalized as the 'other' in the community, the group for which unemployment, economic, education and health problems is scapegoated. In conclusion, it was recommended that a long-term plan for integration of refugees is required or else Syrians will continue to struggle to fulfill their basic needs and will remain the 'other' - the 'guest' who has overstayed their welcome (Dromgold, 2015).

In 2015, Global Policy and Strategy conducted a policy paper on the Turkish migration policies and the social concerns of the Turkish population. On general, attitudes towards immigrants and refugees are determined by economic, security and cultural perceptions. Results of this study showed that 70% of Turkish citizens feel job insecure because of the influx of migrants which is comparatively high when compared with 50% for US citizens. In regards to security and cultural perception attitude towards migrants, the report stated that almost 2/3rd of Turkish citizens (around 62.3%) are confident that Syrian refugees are involved in major acts of violence, smuggling, burglary and

prostitution, which impends the peace and safety and destroys the ethical and moral principles of Turkish society. In addition, Turkish public perceives refugees as a burden and do not want them to stay any longer in the country. Majority of Turks (81.7%) strongly disapprove granting citizenship to refugees while only 12.3% of citizens agree with the assumption only because they believe that Turkey will be stronger with Syrian population (Demir, 2015).

There is a set of organized and governed legislation for the migration to Europe such as the national laws of European Union member states and European Union law. In order to manage the process of non-citizens' entry and long-term existence in EU member states territory, it creates a sovereign right to monitor their borders. But EU law restricts the exercise of this jurisdiction by setting some rules. The EU put forward new powers across the field of the border.

This process culminated in the Lisbon Treaty, which gave the European Union a new jurisdiction over the integration of third and/or developing country citizens. These competencies include setting entry and residency requirements for third-country nationals who legally enter and reside in an EU member state for family tracing and reunification. Member states still reserve the right to set admission rates for people coming from third and/or developing countries to look for employment opportunities.

The Treaty on the Action of the EU (Article 78) commits that the constitution of a “Common European Asylum System” following the EU Charter of Fundamental Rights, the right to asylum is specified as: “The right to asylum must be warranted with keeping in mind the rules of the Geneva Convention and following the Treaty on EU and the EU Labor Treaty. It forbid “returning a person to a situation in which there is a well-founded fear of persecution or a real risk of torture or treatment. or inhuman and degrading punishment.” This ban is known as the “principle of non-refoulement” and implements to both returns to the country of origin and countries of transit where the refugee is at risk (Favilli, 2020).

EU law does not provide access for asylum seekers even though the EU Charter of Fundamental Rights ensures the right to asylum. EU law states that refugees must obtain a visa when applying for asylum in an EU member state, as in the case of Syrian refugees

they do not even have any official documents with them. The absence of the official documents for the irregular migrants; therefore, the principle of non-refoulement does not apply to them because Directive of EU law states that third-country nationals residing illegally cannot be left in limbo. According to this Directive, EU member states must either organize their stay or return them to the country of origin or to the country of transit (Favilli, 2020).

Sarvimki research has shown that even ten years after the arrival of migrants in Finland, the average income of immigrant men from refugee countries is only 22-38 percent of that of native men of the same age. Even the relative gains for women were lower.

Additionally, the earnings gap on the parity scale has persisted over time, although gaps have narrowed. Asylum seekers and refugees may be younger and have stronger motivations than other non-economic migrants; more difficulty in organizing self-employment, and thus also suffer from lower incomes. This is mainly due to insufficient or incomplete education and low level of language proficiency in the host country (Sarvimki, 2017).

Research conducted in Dutch and Netherlands, in relation to reception and integration of refugees in the Dutch model the issue depends on a set of governmental procedures, which in turn aims to address the urgent needs of refugees as well as facilitate their structural and institutional integration into the host community "Dutch society" gradually.

Asylum seekers in the country usually go through a two-step, the first when is that includes a stay of up to 48 hours in an investigation center (OC) according to admission procedure, the second one is staying a few months in an asylum center (AZC). Nevertheless, a third stage is where temporary residence permits ("F" status) are granted, according to the admission procedure as well within this stage usually lasts for up to three years and includes several services provided to refugees such as housing and a modest allowance, still and all there are no provisions for integration into Dutch society such as compulsory language vocational training, retraining and the right to work.

It was described that the state controlled their lives especially that they depended on social benefits due to the unemployed and the difficulty of obtaining work. Therefore, the logic of control and strict direction exercised by the state and its institutions during the “phase” of reception and integration is not reflected. (Donders & Stegink, 2019).

Lack of a well-established social welfare system in Italy, as in southern European countries, has resulted in a backward integration program and measures to assist individuals who have been granted asylum. Henceforward, the model of the country's social protection and welfare system has resulted in minimal assistance provided to asylum seekers and refugees from government.

Through self-help systems established within refugee and immigrant networks, which will encourage them to achieve self-sufficiency in a short period. still there is a shortage of an organic legislative framework compatible with a global social plan regarding the receiving and integration of refugees in Italy. Whereas in 1998 the new immigration law emerged provides, for example, for the accommodation of asylum seekers in government-run centers; However, few such centers have been established. At the national level, there was a lack of integration strategy, in the situation that governmental organizations and the NGO sector in Italy are constantly dealing with emergencies. Most of the organizations were established in the early 1990s. but the NGO sector in Italy within their specific tasks and powers in terms of providing the assist for asylum seekers and refugees is a relatively recent phenomenon.

They are unevenly scattered throughout the country and fewer in number than ecclesiastical organizations assisting the destitute in general, including refugees. The "policy" of emergency-based assistance, in the context of the government, some of the active actors working in the humanitarian field such as NGOs and church organizations, provide shelter, usually available for up to three months, while church organizations also provide free meals (one per day).

In terms of language barriers, church organizations offer language courses for refugees. Despite the fact that these types of help remain scarce, especially in shelters. Consequently, asylum seekers and refugees are often forced to sleep on the streets of the towns and cities in which they wish to settle.

This situation has been exacerbated not only due to the insufficient organizational and financial capacity of NGOs to providing assistance to refugees in Italy but also due the lack of a comprehensive targeting strategy to identify the most vulnerable. Other integration initiatives, and often innovative programs targeting the employment and/or educational needs of refugees, there are still small projects, insufficient to meet the essential needs of the increasing rate of refugees. Hence, the lack of knowledge is becoming the main problem for accessing these available services. Likewise, in very few government-run programs to help refugees, such as providing funding for the refugees who want to start a small family business, assistance is difficult to come by. This is either due to a lack of knowledge and the ability to access this type of assistance or because of the very bureaucratic procedures for applying and deciding. It is common for the resources allocated by the government to such programs to remain untouched at the end of the fiscal year.

According to research conducted in Denmark, the municipalities and local governments bear the responsibility for receiving and integrating refugees. This includes providing housing and shelter, healthcare services, language instruction, integrating refugee children into day-care centers and schools, and facilitating access of refugees for the Danish labor market. But for many municipalities, the sudden spike of refugees and to deal with these different services resulted in creating new strategies and a draft of new plans for these urgent needs.

Therefore, in the past two years, following to create or expand and intensify collaborative efforts across the different sectors, a number of municipalities started working with voluntary refugee organizations. Similarly, at the national and local levels, refugee organizations in Denmark encouraged expanding and strengthening the cooperation with public authorities and institutions. Although in most cases cross-sectoral cooperation magnifies efforts to assist persons of concern, it may also affect advocacy functions in organizations as they are in a mutually subordinate relationship with public authorities (Fehsenfeld & Levinsen, 2019).

Organization for Economic Cooperation and Development (OECD) countries working in the field of refugees, labor market environment one of the critical elements that affects the process of integrating refugees into society, as example in Germany the

labor market condition is positive as well as the joint of youth group promote of labor market, making Germany among OECD countries lowest unemployment rates (*Finding-Their-Way-Germany.Pdf*, n.d.).

Since early entry to the labor market is one of the main factors that determine long-term findings in this concern, Germany has been working and taken many actions to simplify of early entry to the labor market, while this current framework has become commonly among the most liberal countries in the OECD countries. The access to the labor market become after three months. This enhancement is mostly significant as the main duration of the asylum process is rising once more, particularly for Afghans which their rate close to 50%. Together, there was no fair in distribution permits work were requested of asylum seekers based on their nationality (*Finding-Their-Way-Germany.Pdf*, n.d.).

UK and Netherlands have numerous common characteristics in their response to refugees and asylum seekers. Both present a discourse that portrays their country as having a long history of offering safe havens, tolerance of disparity, and until recently, support for multiculturalism.

Nonetheless, as a result of the spike of asylum seekers figures, both nations are therefore concerned with the issue of integrating recognized refugees with the development of a wide range of social networks as well as equal access to basic services such as work, health, and education, and where local language proficiency is an important aspect of inclusion and viewed as political priorities.

These can be recognized “dual policy objectives”: on the one hand deterrent and exclusivity during the asylum procedure and on the other hand comprehensive integration objectives for those who have been granted the stay permission. In the matter of the policies and regulations of both countries congregate, their models used to support asylum seekers and providing services as well as facilitating integration it differs noticeably.

In terms of procedures for housing asylum seekers, the Dutch prefer using centers. Temporary asylum accommodation, which basically separates asylum seekers from the public, while the UK either scatters asylum seekers to residences in underprivileged areas across the nation and includes them in the communities in which they are most frequently

located. Being prejudiced, harassed, isolated, or allowed to stay with relatives and friends on a 'subsistence only' basis.

Regarding integration, refugees in the Netherlands are transferred to state-supported housing once they have been granted leave to stay and are forced to pass an inclusion exam. By contrast, most of refugees lives in the UK are expelled from their asylum accommodation within 28 days after leave to stay is granted and do not have access to the government's integration programme.

Asylum seeker or a refugee came into other countries he has a hope to build a life that ensure his dignity and all human being rights. However, one of the elements that ensure a good quality life for a refugee is to access work to generate his own income, whereas this could be a real challenge for refugees. Turkey's market has been facing a lot of obstacles regards informal employment a huge number of refugees are accepting to work under low wages and without insurance which the unemployment rate increased and children labour market (Phillimore, 2012).

In the year 2000 for the United Kingdom refugee inclusion arose as a major policy objective when the New Labor government pointed out its desire to make refugees full and equal nationals and great emphasis was placed on the role of integration policy and initiatives in securing settlement for their integration into society.

Although it was accepting and even encouraging ethnic minority groups to retain their culture, identity and language, the United Kingdom, followed a multicultural path to reach immigrant settlement alongside countries such as Canada and the Netherlands, by encouraging immigrant community organizations and providing specialized services., where the state facilitated the maintenance of on culture at this point.

Where funding has been provided to refugee groups by the Ministry of the Interior to establish their own Refugee Community Organizations (RCOs), the idea is that these groups will enable the retention of cultural identity and encourage self-help. Initial approaches to refugee integration were complementary.

By participating in the National Refugee Integration Forum (NRIF) which provided advice to the government jointly with other professionals, the government has engaged

in a dialogue on refugee integration with regional organizations. Due to a noticeable change in integration procedures in 2006, difference of concerns has been emerged in UK as example unease that the integration approach promotes separatism, rejects shared sanctuary for terrorists reflecting the respond against multiculturalism. And the strategy of the Ministry of Interior, towards integration policy focused on re-commitment to integration published in 2009, and the shift to encouraging participation in domestic society by providing opportunities. while Integration occurs just when migrants are accredited in order to facilitate their contribution to society by achieving all necessary and immense potential as part of the British society. Access to all the services to which they are entitled. The two components, language, and cultural knowledge are the main barriers that prevent refugees from confidently engaging within societies.

Therefore, through the rehabilitation and volunteering of refugees, they are encouraged to obtain citizenship. A British language test (through the Life in the UK Test) has been established where they consider it the most important component of obtaining citizenship and can be denied citizenship if they fail to demonstrate sufficient understanding of the British language or the English language (Phillimore, 2012).

Another important development on immigration literature has been the emergence of multi-level governance (MLG) approach in the immigration and integration policies study. Indeed, in recent years, as a result of increasing discontent with the predominant focus on national migration laws, increasing number of studies explicitly has adopted MLG perspective (Scholten and Penninx, 2016). Integration policies are framed not only at the national level, but also multiple levels involving several levels of government and civil society as well as supranational actors.

In addition, to the national level, the European Union (EU), regional and local levels have become more engaged. Thus, there has been utmost emphasis to the interaction of supranational, national and local levels of government in integration policymaking. As van Breugel and Scholten (2018) point out, integration policies often take place within the context of cities and provenances. At this level, migrants, and natives they meet, exchange thoughts, attend school, explore employment opportunities and do many other things. Therefore, it is extremely crucial to examine how integration policies crystalize at local level.

Similarly, van Breugel and Sholten (2018) point out that there is an obvious trend away from state-centric styles of governance to more poly-centric governance. This situation increases the complexity in the field of integration governance because poly-centric governance requires the involvement of both governmental and non-governmental actors (including civil society organizations, private sector and educational institutes) in the policy process. They argued that in the Netherlands, UK and Spain, the local level has become even more pertinent in the context of integration governance. In the literature, this is called as ‘local turn’.

With regard to integration governance this situation often results in important discrepancies in integration governance between cities within a specific country, as well as between the local and the national level within is taking place, while at the same time the state-centric model is upheld. Moreover, in Poland and Spain, poly-centric governance utilized NGOs as a cornerstone in integration governance, at both the national and the local levels (van Breugel and Sholten, 2018).

3. An Overview of Integration Policies in Turkey

In this chapter, at first, the concept of refugee integration will be explained, later, legal and institutional framework established in Turkey for refugee integration will be outlined, finally refugee integration policies in Turkey will be summarized and existing challenges will be described by sectors.

3.1 Refugee Integration Concept

It is worth mentioning that durable solutions and self-reliance for refugees include voluntary repatriation, local integration and resettlement, these solutions are the ultimate objective of refugee protection as it resolves the problem of forced displacement (Ekmekci, 2017). There is no clear definition nor a solid scientific definition for the term integration and it differs from country to another; however, in generic understanding integration simply means equality.

There is no globally agreed definition on the term ‘integration’. The concept of integration has various meanings. In general terms, integration means setting up suitable conditions for everyone to play an integral part in national and local level. In a simple manner, integration could be described as a process intended to enable the migrant to achieve equally with the host community members to contribute to a smoothly functioning society.

Integration is a multilayered and multidimensional process, requiring efforts and initiative from both immigrants as well as those already inhabiting the receiving country. Integration can thus be interpreted as a two-way process. This necessities adaptation by the newcomers as well as by the host society. Scholars have also embraced the integral role that countries of origin might play in support of the integration process. (G. Bucken-Knapp et al., 2020:6).

International Organization of Migration (IOM) and EU interprets integration as the process of incorporating migrants and/or refugees into the civic, economic, cultural, and political life of the host community through a joint set of obligations and commitments from all refugees, migrants and communities.

It has been well noted that in order to achieve integration, ensure social coherence and international protection, governments need to adapt long-term solutions for local integration through stipulating new arrivals into the host community incorporating all integration dimensions.

These dimensions include legal, economic, and social-cultural aspects. To achieve solid cohesion, a two-way integration process needs to be utilized. This means acceptance from the host community and the refugees as well as the efforts of stakeholders contributing the benefit of all parties.

Cappiali (2019) framed three steps to integration. These include assistance, intercultural, and political rights promotion. The first one is assistance approach. This approach points to intervention by state and non-state actors to promote social protection, through delivery of services and advocacy for immigrants in vulnerable conditions. However, the assistance approach is criticized as seeing immigrants as passive subjects. The second one is intercultural approach. It is based on the idea that integration is reciprocal.

According to this approach, diversity is a valuable resource and intercultural policies are seen as a governance strategy to promote greater synergy between the hosting communities and immigrants. This method promotes cross cultural exchange and interactions among immigrants and the hosting communities. The third one is political rights promotion approach. It refers to the necessity of providing alternative channels of political participation for immigrants who usually do not have voting rights. Those who advocate this method consider political rights as principle to assure immigrants' full inclusion into society. The motto is rather than speaking on behalf of immigrants, let them speak for themselves (Cappiali, 2019;119-120).

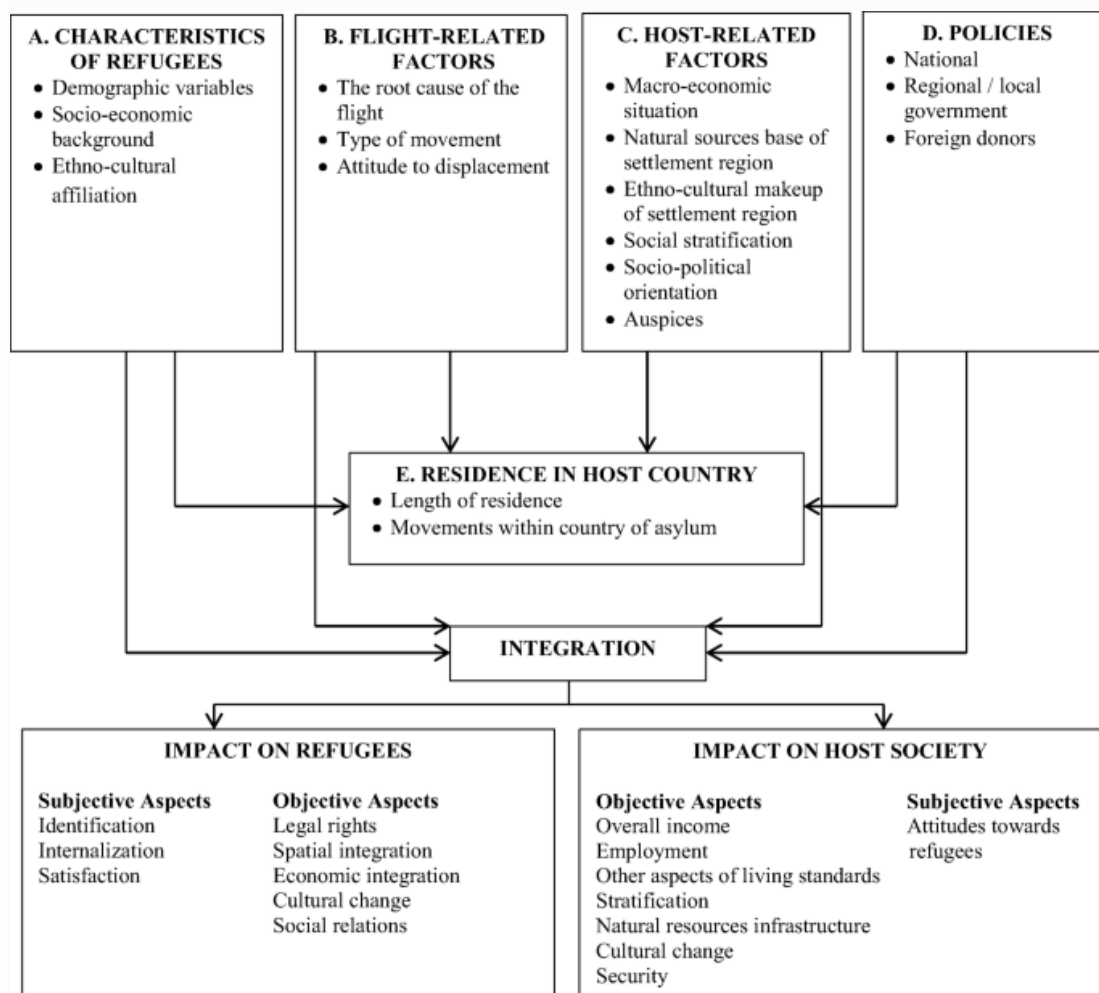


Figure 3 A comprehensive model of refugee integration. Source: Sevda Akar & M. Mustafa Erdoğan (2019)

The integration process is considered a multidimensional and multifaceted process. Integration must be viewed as a bilateral process between new arrivals and host communities.

In recent years, integration has been a core issue for Turkey, especially that Turkey is a country hosting millions of Syrian refugees, and although there is no agreement on the best form for successful integration, in line with providing refugee with job opportunities in order to generate their own income as well as an empowered refugee in term of access to education, health system and the public services, these different aspects that can be identified the process of successful integration for refugees.

3.2. Refugee Integration Policies

It is very difficult to say that Turkey has legitimately formulated extensive integration policies aimed at integrating migrants and refugees into the wider societal context of the country. Before the Law on Foreigners and International Protection (LFIP) there wasn't any substantial formulation of integration policies. The main reason for this situation is explained by İçduygu and Şimşek as follows: "The Settlement Law of 2006 grants the right to permanent settlement in Turkey only to persons of Turkish descent and culture.

In addition, Turkey's geographical limitation included in the 1951 Refugee Convention precludes non-European asylum seekers from permanent settlement in Turkey. These two legislative reservations accord refugees with a temporary protection status that disqualifies them from the prospect of long-term integration as a lasting solution. With the vast majority of refugees coming from non-European countries, Turkey did not feel obliged to develop a national integration policy until the ratification of LFIP." (İçduygu and Şimşek, 2016:65). In addition, Turkey was more of an emigration country as well as a transit country, rather than an immigration country. Subsequently, immigration laws, regulations and institutions regarding integration policies for foreigners have been pretty weak.

Nonetheless, Turkey has become from a country of emigration to a transit and a receiving country. As addressed by an OECD Report, Turkey has been the world's most refugee hosting country since 2014. It should be also noted that in 2018, about 3.6 million Syrians benefited from temporary protection in Turkey (*OECD, 2019:25*)

The transition in migration patterns towards more immigration, coupled with the accession negotiations with the EU, have resulted in new legislative efforts. The Law on Work Permits for Foreigners (LWPF), passed in 2003, and later the LFIP, passed in 2013, dealt with the regulation of foreigners' status and work permits (İçduygu and Şimşek, 2016:62). The LFIP first time contained provisions on migrant integration. Therefore, the integration of non-European asylum-seekers is a new situation in Turkey. Article 96 of

the LFIP intentionally used the term “harmonization” instead of “integration” which reveals a very delicate approach to integration challenges.

Turkey’s legal and policy interventions in response to Syrian refugee crisis has resulted on adoption of new laws, establishment of new institutions and development of refugee policies in order to cope with socio-economic integration challenges.

3.2.1. Legal and Institutional Framework

When we look at the current legal and institutional mechanisms regarding migration in Turkey it can be said that the most important legal arrangement is the adoption of the Law on Foreigners and International Protection (LFIP) in 2013.

This law introduced principles and institutions for immigrants, refugees, and persons of concern for international protection, including the conditions for temporary protection, which is limited to situations where immigrants were forced out of their country, could not return, and were in need of emergency and temporary protection. (İçduygu and Şimşek, 2016). The LFIP stated four international protection categories. They are: refugees, conditional refugees, subsidiary protection, and temporary protection.

Since Turkey’s ratification of the 1951 Refugee Convention, the Law on Foreigners and International Protection (LFIP) has been considered the first law comprehensively regulating asylum practices and a major step forward towards transformation and regulation of asylum and immigration to Turkey. The Law regulates the entry and exit of foreigners in the country as well as the scope of international protection for those seeking asylum in Turkey. The law also introduced new regulations and decisions regarding work permits. It regulates international protection and the conditions and rights of foreigners in the country as stipulated in Article 1 of the Law. Under this law, the basic framework for foreigners in Turkey has changed. The LFIP abolished the Law on Movement and Residence for Foreigners. Besides, various articles of the Passport Law were repealed.

The main objective of the Law as mentioned above is to control the entry, exit and residence of foreigners. The novelty of the law is that it defines a law and brings together all definitions used in the field under the same legal framework for the first time. In this sense, it defines not only who is entitled to refugee status, subsidiary protection and

humanitarian leave to remain, but also terms such as victim of human trafficking, unaccompanied minor, stateless person, and persons with special concern who seek international protection (such as persons with special concern, single mothers, and victims of torture or sexual harassment).

Under this law, employees working in the field can determine the special needs of people belonging to different groups. Interestingly, the law maintains geographical limitations. Accordingly, the term "conditional refugee" is chosen for recognized non-EU refugees in the process (*The_New_Draft_Law_on_Foreigners_and_and international protection.Pdf*, n.d.).

Indeed, the LFIP preserved Turkey's geographical constraints to the 1951 UN Convention on the Status of Refugees and its 1967 Protocol, and grants refugee status only to 'persons who have become refugees due to issues occurring in Europe'. So, Syrians were not allowed an official refugee status. Instead, the 'temporary protection statuses were offered as a group-based protection scheme in times of mass influx of displaced persons (Memişoğlu, 2018:11).

In 1991, approximately 500 thousand asylum seekers entered Turkey from Iraq increasing the asylum caseload. Turkey did not have a clear-cut refugee policy until the 1950s neither was there a strategy for the refugee integration and for this reason it was not prepared for such the recent huge flow of migration. Although Turkey's refugee law is based on the 1951 Geneva Convention which considered the first step toward the development of migration policies, and the concepts of refugee and the asylum seekers are defined according to geographical reservations, the 1994 Asylum Seekers Law is limited only to persons seeking refuge from Europe.

On the contrary, despite the refugee definition of the international law persons from countries that are not members of the Council of Europe were not considered refugees. For this reason, Turkey only granted refugee status to citizens of Council of Europe member states, with the incensement of Syrian in Turkey, together with the Turkey's candidacy to EU motivated Turkey to develop new policies in accord with EU legislation.

Due to the continuity of the flow and the EU directives on asylum and migration since the early 2000s, the Turkish government adopted the Law on Foreigners and

International Protection (LFIP) in 2014. This law specifies procedures for foreigners, refugees, and people in need of international protection, including the conditions for temporary protection, which is limited to situations where foreigners were forced out of their country, could not return, and needed emergency and temporary protection.

In 2003 on migration and its implementation in the context of the Partnership Instrument of Accession for Turkey, Turkey agreed to adopt and implement the best practices obtained by the EU. The EU also requested on readmission of third-country nationals from Turkey to sign an agreement in 2003. Turkey agreed to continue to conform to its acquired and best practices in border management and granting asylum to refugees, including the lifting of the geographical reservation to the Geneva Convention of 1951, which strengthens the system for hearing and deciding on asylum claims, and the development of accommodation and social support facilities for asylum seekers and refugees, which are the steps required for the full implementation of the Schengen Agreements. The readmission agreement developed in 2009 which aim to effective and rapid procedures and reciprocal, for safe return of individuals who no longer fulfill the conditions of entry, presence, or residence. Regarding third country nationals and stateless persons, Turkey, and the EU in 2013 they signed in this agreement.

Thus, to facilitate, in a spirit of cooperation, the transit of these persons in and through the territory of Turkey or one of the Member States of the Union. Nonetheless if the person does not want to return and in compliance with the readmission agreement, Turkey will readmit stateless persons as well as all third-country nationals.

Turkey must prepare its capacity to provide a legal, fast and secure readmission system that respects human dignity and fundamental human rights to implement the readmission agreement. In Turkey the readmitted irregular refugees will be held in readmission centers. Irregular migrants waiting to be readmitted to their place of origin can stay in readmission centers for 12 months because the time for Turkey to send them back to their country of origin or transit country is 6 months. If the transaction cannot be completed within 6 months, the Turkish administration may request another 6 months (Ekmekci, 2017).

In November 1994 Turkey started to adopt new regulations on the status of asylum seeker. Therefore, "temporary protection" regulation was provided legally allowing

asylum seekers from outside Europe to "stay in Turkey for a reasonable period of time", that is, to "provide a temporary residence in Turkey until they are resettled as refugees to a third country." (*Refugees at Risk*, 2019).

Following the Syrian influx to Turkey, Turkey adopted the EU refugee and migration policy within the framework of the European Union membership negotiations. Under those terms, it was reported that the Prime Minister issued in April 2012 "temporary protection" law, within this legal framework, refugees and asylum seekers under TP are allowed to freely across the borders, have access to humanitarian aid and their safety and security is granted. Nonetheless, this law remains vague and unclear as it does not include any elaboration on the other rights such as work and access to education, and limitations of "temporary protection".

On 22 October 2014 the Regulation on Temporary Protection was published in accordance with article 91. The 22 Article of the regulation specifies those immigrants under temporary protection are to be issued temporary protection identity documents to facilitate their legal, social, and public affairs within the country. The regulation affirms that all basic human rights such as access to shelter, health, education, and labor market, and social assistance will be provided to those who have an identity document. It also declared that refugees residing in out-of-camp settings are not provided with the right to shelter this forces refugees to live in poor housing conditions mainly due to insufficient financial means (Refugees, n.d.-b).

In September 2014, a circular issued on the access of foreigners to education by Ministry of National Education, confirmed that all persons of concern considered under temporary protection can receive free access to public schools on the condition that enrolled students must have either a residence permit or a temporary protection identity card. Persons of concern willing to proceed and aspire to continue their tertiary education in Turkey must conduct and pass the Foreign Student Examination (YÖS) organized by universities.

In addition, the TP framework provides refugees access to health services; however, all medical and health related expenses are expected to be covered by their own. Especially, for non-communicable and chronic diseases such as those in need of organ transplantation, orthotics, hemodialysis, or long-term treatment.

Turkey considers accessing for health services as one of the human rights according to the Turkish Constitution. In many respects the refugee laws are in compliance with that of UN and EU. Therefore, the social rights stipulated in 1951 Geneva Convention and 1967 Protocol are eligible for refugees. As mentioned above due to Turkey's geographic reservation in terms of execution of the Geneva Convention which only asylum seekers originating from European countries are recognized as refugees, to non-European countries, The LFIP introduced the 'conditional refugee' status. Syrian refugees are granted a 'temporary protection' status.

Since the beginning of Syrian crisis and the huge influx, there has been a systematic registration in camps for Syrians to access public and health services. The official registration was the most important condition and a very important matter for Syrian refugees.

Due to the fear of deportation in the future, some refugees do not register officially. Furthermore, there is a lack of knowledge. Some refugees do not know the registration process and steps. Because of this, the gaps in the national data system leads to repeated registration processes by different public institutions. This outcome affects the actual number of Syrian refugees staying in Turkey.

Therefore, in the line of registration issue, to register all refugees to Directorate General of Migration Management, an online system has been developed. In matters of access to public services, Syrian refugees are most registered in this online system. This system enhances the process of the official registration regarding Syrian refugees as well as providing more tangible data (Ekmekci, 2017).

Another important legal document in relation to immigration issue was the "Law on Work Permits of Foreigners" numbered 4817. The Law governed refugees' and asylum seekers' access to employment, self-employment, and the labor market in Turkey. However, The Law numbered 4817 was abolished in 2016 and replaced by a new legislation called the Law on International Labor Law (No: 6735).

The 2014 TP Regulation issued by the Council of is another crucial secondary legal document. Which further specified the temporary protection regime scope. The Temporary Protection Regulation lays down the rules addressing Syrians' admission to Turkey, registration, access to social services, health services, education services,

interpretation services, and the labor market. According to Regulation only registered refugees with valid temporary protection IDs can and are obliged to obtain work permits in various sectors, business lines, and geographical regions as determined by the Council of Ministers.

For the purpose of setting the procedures and conditions for Syrians' access to the labor market, the Regulation on Work Permits for Foreigners under Temporary Protection was activated in 2016. The Regulation foresees work permits for Syrian refugees. Consequently, refugees and asylum seekers under temporary protection are entitled to apply for work permits to the Ministry of Family, Labor and Social Services in their respective provinces 6 months after the issuance of their temporary identity documents. These applications are submitted by the employer who will employ the refugees under temporary protection.

An essential condition for the issuance of work permits for persons under temporary protection is that the number of workers in the number of employed refugees should not exceed 10 percent. The above-mentioned conditions continue to hinder most Syrians from obtaining work permits. Figures up until 2017, show that only a little less than 20 thousand Syrian refugees were able to obtain a work permit.

According to the Turkish Labor Law, an employee is defined as “a real person working under an employment contract; the primary purpose of the Labor Law is to regulate the working conditions, rights and work-related obligations of employers and employees employed under an employment contract. However, this law applies only to citizens and expatriates who enter the country through clear legal pathways. This law governs the entire framework and does not take any consideration of particular groups (“4857 Labor Law English By Article,” n.d.) .

In accordance with latest figures made available following a request from an MP to the Presidency Communication Centre (Cumhurbaşkanlığı İletişim Merkezi, CİMER), the number of work permits issued to Syrian temporary protection beneficiaries from 1 January 2016 to 30 September 2018 was 27,930. Out of which, 25,457 permits were issued for men and 2,473 for women. The main provinces issuing work permit to temporary protection holders are as follows;

Work permits to temporary protection beneficiaries by province	
Province	Number of permits
Istanbul	7,857
Gaziantep	3,369
Bursa	3,240
Kahramanmaraş	2,313
Mersin	1,617
Ankara	1,002
Konya	945
Hatay	900
Kocaeli	804
Adana	641
Others	5,242
Total	27,930

Table 1 Work permits to temporary protection beneficiaries by province: 1 Jan 2016 – 30 Sep 2018



Figure 4 Refugee access to the labor market condition and restrictions

As mentioned above, six (6) months after the registration process, foreigners under temporary protection can enroll in vocational education programs offered by the Turkish Labour Agency. They can also participate in an on-job training program for one year with their expenses covered by the Unemployment Fund. After completing these trainings, immigrants can have the opportunity to work in the same enterprises and the Ministry of Labor and Social Security has the ability to adjust employment quotas accordingly (ÇSGB, 2016). This provision not only provides a level of flexibility in implementing the foreign worker quota system; it also can help Syrian workers to acquire vocational skills and facilitate their formal employment.

The Law on Foreigners and International Protection will only serve a certain segment of the refugee community. Work permit submissions are evaluated on an appropriateness rather than actual ability to perform that task. This implies that only those who are currently employed or have possible employment opportunities can apply for a

work permit. Applications are made through the Ministry of Labor and Social Security website to make the application process practical.

More importantly, to preserve job security for Turkish citizens and not to distort the labour market an essential criterion was set, which states that foreign workers should not exceed 10% of Turkish citizens. In addition, to attract foreign investment the law also captured some encouraging regulations such as providing investors to make their own application permits, facilitating access to self-employment with different incentives and procedural advantages.

Another major amendment is related to work permit application fees which has been doubled. This increase has been considered as a deterrent. Despite all, the law has taken very rigorous measures and enforced extreme penalties in order to prevent informal sector growth providing a crystal opinion on the employment of refugees through official means. All institutions found informally employing workers will be penalized with extremely expensive fines. This stimulates a stress factor for all foreigners in the country, especially Syrians, to pursue formal employment (*LAW ON THE WORK PERMIT FOR FOREIGNERS.Pdf*, n.d.).

On July 7, 2016, it was announced that Syrians would be given the opportunity to become citizens of the Republic of Turkey, and this step was considered a milestone achievement and a historic accomplishment in the durable solutions framework of Turkey. For a Syrian refugee to be eligible for a Turkish nationality the following requirements need to be met;

1. To be graduate of tertiary educational institute,
2. Served or has the ability to serve in the fields of industry, science, economy, and technology in Turkey,
3. To obtain a valid work permit in Turkey.

According to the estimates of The General Directorate of Population and Citizenship Affairs 55,5839 Syrians are now Turkish citizens. Despite the positive arrangements in the provision of durable solutions for the integration of Syrian refugees, refugees who do not meet the specified requirements still remain deprived of the rights of being a citizen.

3.2.2 Issues in Refugee Integration

Memişoğlu (2018) stressed that the Turkish government for a long period of time considered the Syrian refugee crisis as a temporary issue. As a result, the response was to adopt ad-hoc policies and provide abundant humanitarian assistance to the displaced population. However, the extended presence of Syrian refugees of whom over 90 percent currently reside in urban settings leashed new political, social and economic challenges.

Protection and humanitarian assistance for Syrians has kept stretching over time, introducing, on one hand, regulations facilitating access to various basic services (such as education, health, etc.) and on the other, new restrictive measures concerning freedom of movement, due to the Turkish government's mounting national and regional security concerns (Memişoğlu, 2018:8)

Currently, the issue of refugees and their integration occupies a prominent place in Turkey's political and social agenda. As mentioned before, forced Syrian migrants are not entitled to any asylum rights the geographical limitation to 1951 Geneva Convention that Turkey imposed. To provide them certain rights the Turkish government defined their status as "temporary protection".

This temporary protection status especially frames the living conditions of refugees living outside the camps. Refugees have difficulties in accessing regular work, education, social and economic support and face many problems. In order for refugees to benefit from the rights provided by the temporary protection status, they must register and obtain an identity card. If the Syrians change cities, they should notify the authorities and cancel the old one and have a separate identity card for the new city they go to. After obtaining an identity card, they have similar but limited social rights with Turkish citizens.

We can categorize the problems experienced by Syrian refugees as housing and nutrition problems, education problems, problems encountered in health services, problems in working conditions, insecurity and uncertainty, and problems arising from the negative attitudes of citizens in the host country. We will examine these issues under separate headings below.

3.2.2.1 Shelter Challenges

Refugees choose to live in urban areas where they face serious challenges such as finding a home, paying rent, finding a job and accessing education and health care. This is for the following reasons:

1. The number of total refugees exceeded the capacity of the refugee's camp.
2. Family relationships and financial opportunities provide some refugees with opportunities, such as ease of housekeeping, particularly through relatives.
3. That the illegal Syrians in the country are denied access in camps. They spend most of their income on rent, which they pay more than Turkish citizens.

In addition to the high costs of housing, they also have difficulties in feeding. Some registered refugees have monthly shopping cards. The informality of many Syrian refugees in the cities has become a difficult problem for the authorities and relief organizations in Turkey. Disaster and Emergency Management (AFAD) stated in its 2014 report that more than a third of refugees residing in urban settings are unregistered. This situation prevents them from taking advantage of the services. Because registration is the first step to benefit from basic service and protection (İçduygu, n.d.)

3.2.2.2 Education Challenges

Education is an effective tool and weapon towards preventing or mitigating exploitation and gender-based violence. Education also prevents child workers from working or marrying minors, which is an important tool in reducing poverty. In addition, well-educated women will also be able to participate in working life. Despite the opportunities given by the Ministry of Education for children to obtain free education in Turkish schools under the law drafted by the Ministry in 2013 which stipulates the inclusion of refugee children in Turkish schools free of charge, only 14% of children who live outside the camps go to school because of the financial situation of Syrian families, as the costs of transportation and clothing, and the language is a great barrier for them to send their children to school, as they fear discrimination in the school society.

According to researchers conducted in the field of why children's enrollment in the school rate is low. The reasons can be offered as follows:

1. Commitment to work (child labor) or work in factories as informal labor to support their families is one of the main reasons especially for high school students to help their families in budget.
2. Some families do not aware about the education opportunities provided to them by the Ministry of Education in Turkey.
3. More than few of Syrian refugees considering Turkey as a bridge to go to another country, their stay period is temporarily, therefore may not choose to send their children to school.
4. Tuition fees are another barrier to many students' access to education. Although education is free for refugee children, many schools are supported by donations from the students' wealthy families.
5. Language barriers, as well as a fear of discrimination, most of families prefer not to send their children to school, besides of that Students can continue their education in temporary education centers or Turkish public schools. According to the obligation imposed by the state, Syrian students in kindergarten and first year can only enroll in Turkish schools.

3.2.2.3. Health Challenges

Considering the difficult conditions that refugees are going through during their arrival in Turkey, which most Syrian refugees consider a safe crossing and because Turkey is close to Syria, besides their trauma, their inability to eat properly and being subjected to severe pressure.

Before being placed in deportation centers, refugees undergo a full health check, they are vaccinated, and obtain health records. In this regard, for persons under temporary protection health centers established by the Ministry of Health of the Republic of Turkey are in line to help them in their health problems.

These Circulars do not contain specific statements and are inconsistent with international law. The centers are in charge to provide both primary and secondary health services. Primary health care deals with routine immunization programs for children, infant care, and health advice for expectant mothers and their babies.

Refugees living in and outside camps can benefit from primary and secondary health services free of charge. Approximately 30-40% of the hospitals on the Syrian

border consist of Syrian refugees. For this reason, the local people residing here complain that the 'real people who should benefit from health services are deprived of it because of the Syrians.

Refugee health centers were built to remedy this situation. These centers aimed to provide primary health services to Syrian refugees by working with community health centers. According to research conducted by many different organizations, Turkey does not provide health services to unregistered refugees, even in emergencies. Since most of the workers work as illegal workers without a contract, they do not have health insurance (*Türkiye'deki Suriyeliler - Özel Rapor*, 2018, p. 15)

Many refugees fleeing the conflicts have been affected by psychological trauma as well as physical illnesses. Despite this, none of the refugees in the study of (Perihan E. Ekmekci, 2017) stated that they received psychological support. According to this study most of refugees stated that the most important obstacle for refugees to reach health services is the language problem as they cannot explain their complaints to the health personnel. Turkey assigns translators to alleviate the language problem. However, the number of these translators is not enough. The constant movement of refugees to other cities also creates problems. For this reason, community health centers cannot regularly follow up pregnant women, babies and refugees with chronic diseases. Turkey has developed an online system called GDMM (Directorate General of Migration Management), where all refugees must register. Refugees have to register in this system in order to benefit from health services.

This will facilitate the follow-up of patients. According to AFAD's report in 2017, 66% of Syrian refugees benefit from health services. According to the 2018 report of the Parliamentary Human Rights Investigation Commission, Refugee Rights Subcommittee, the health services of Syrian refugees are provided in primary, secondary, and tertiary healthcare facilities. Persons who reach the border to come to Turkey undergo general health screening, and necessary measures are taken in the direction of infectious and epidemic diseases.

Regarding infectious diseases, immunization and emergency health services are offered. Making general health services conditional on obtaining a temporary identification number has accelerated the process of biometric registration of Syrians. Migrant Health Centers have been established in places where the numbers of Syrian are

high to reduce the burden of hospitals and help refugees to access easily to services. They adopt the policy of employing Syrian workers in these centers in place to overcome the language barriers. Besides the increment of Syrian refugees cause problems in terms of monitoring their health situation periodically. According to the 2018 report of the Ombudsman Institution, between 30% and 40% of the overall facilities, especially in hospitals in border provinces, serve Syrians, which is why there is a capacity problem in these hospitals.

The local people, who think that they cannot get enough service, also some diseases such as polio, measles, oriental boil, which are not common in Turkey, have become visible especially in border provinces. According to the report KDK (Kamu Denetçiliği Kurumu), Syrians can receive health services in their region of residence, and if they are not deemed sufficient, they can be transferred to other places.

While they can apply directly to the secondary and tertiary health institutions belonging to the institutions affiliated to the Ministry without being referred directly, they cannot apply directly as examples for private hospitals and can be referred when deemed necessary. In view of the number of Syrian refugees in Turkey, it is highly observed that Turkey needs more support from the European Union and other international organizations in order to provide refugees with conditions in line with international standards (*Türkiye'deki Suriyeliler - Özel Rapor*, 2018-b).

3.2.2.4. Employment (Work Legislation) Challenges

In addition to problems with accessing services such as health and education, Syrian refugees also suffer from labor rights problems. Refugees complain about unemployment. As mentioned before, families are obligated to send their children to work instead of to school. Only a very low percentage have set up their own business in Istanbul.

Obtaining temporary protection status and an identity card does not give refugees the right to work. Most of the Syrian refugees are forced to work temporarily and illegally, with less income than Turkish workers, also under high-risk conditions especially in restaurants and construction industry. In addition, these jobs do not have rights to health insurance and social security.

It can be also argued that lack of work permits is still the most important problem faced by refugees in Turkey. This situation also reflects the unprotected environment for them and leads to exploitation. The second problem is that they do not have authorization or institutions to complain about unpaid wages and exploitation. Accordingly, all registered Syrians will be able to obtain an official work permit in the country. However, according to reports, only less than 0.1 percent of Syrians were able to obtain the right to work under the new labor law until April 2016. This is partly because Turkish employers' refusal to pay the minimum wage (Mackreath and Sağnıç, 2017).

Restrictions on work permits cause many difficulties. Some of them as follows:

1. A refugee worker holding a work permit cannot change the work area or workplace while on this permit. For this reason, the refugee worker is associated with certain employers, which leads to exploitation.
2. Exploitation arises from cheap labor and encourages employing informal workers. The situation might be seen as an advantage by some employers.
3. The local community started to complain about the limit of job opportunities and most of them are afraid of losing their jobs or unfair competition.

According to the report of the International Crisis Group in 2018, the competition between unskilled Syrian and Turkish workers over unregistered job opportunities fuels social tensions. Unregistered citizens complain about low wages, employers preferring Syrians, and therefore they are losing their jobs. The rate of informal employment is relatively high in sectors such as textile, furniture production, construction, seasonal agriculture (Türkay, 2019).

4. The Role of NGOs on Refugee Integration in Turkey

Meeting the urgent needs of Syrian refugees who fled to Turkey after the outbreak of the Syrian civil war became an important issue. In addition to government organizations, civil society organizations including international NGOs have emerged an important partner in the provision of humanitarian aid such as shelter, nutrition, transportation and health-care services.

Turkey experienced a surge in the registration and establishment of non-governmental national organizations; thus the number of registered NGOs has increased from 88,646 in 2011 to 111,307 in 2017 according to the official governmental reports (Sunata & Tosun, 2019), this increase is mainly due to the huge influx of Syrian refugees from 2011 onwards. When Syrian refugees first started to enter Turkey, the Government designated AFAD as the institution responsible for Syrian refugees.

In the tent and container cities established, the provision of services such as shelter, nutrition, health, security, education, worship, translation and communication for the refugees under temporary protection is carried out jointly with all relevant public institutions and organizations under the coordination of AFAD. Article 103 of the LFIP (No: 6458) regulates the establishment of the DGMM. In this context, various departments, research centers, commissions and committees have been established within the General Directorate of Migration Management (Kahraman & Taniyici, 2018).

Non-governmental organizations (NGOs), especially international NGOs, played an essential role during the refugee crisis in Turkey. Although problems have arisen regarding the operations of NGOs, many international organizations are still actively operating in Turkey at present. The resilient partnership of the Turkish state with international organizations, especially the United Nations, still remains. The role of international NGOs, NGOs, and the government in integrating Syrian refugees in Turkey. It is worth noting that the United Nations High Commissioner for Refugees (UNHCR), the International Organization for Migration, the International Center for Migration Policy Development, the World Bank, and especially the German Agency for International Cooperation (GIZ) are of particular importance among the international organizations working in the field of refugees in Turkey.

Another development that has occurred since 2011 in Turkey is the extraordinary increase in a crisis management capacity, particularly in the area of refugee rights and field operations. The amount of staff members employed by international organizations, NGOs, UN organizations and powerful local NGOs has increased. And it led to the establishment of new and sustainable sector capable of working in line with international principles, developing and implementing projects, arranging relations between public, non-governmental, and international organizations.

Again, the Migration Policies Board was established to ensure coordination between public institutions and organizations in the field of migration. In addition, representatives of national and international actors were also allowed to attend the meeting within the framework of the agenda.

One of the most important problem faced by refugees in Turkey in the medium and long term is education. In this respect, in most of the schools opened for Syrian refugees in Turkey, local, national and international non-governmental organizations have provided both financial aid and consultancy services, especially since the establishment of these schools. Because even in 2016, the Ministry of National Education did not have a special budget for such schools.

With the intention to hinder irregular migration from Turkey to the European Union, a joint action plan was signed to improve collaboration efforts cooperation between Turkey and the EU. According to this plan, Turkey through strengthening the exchange of information on migrant smuggling between Turkish law enforcement agencies and with actors in the European Union and the eleven member states, as well as to facilitate cooperation within the framework of the NATO operation in the Aegean and is supposed to start ground operations to prevent irregular departures, as well as to increase national efforts to combat migrant smuggling more effectively. But the ability of these units to deal with a huge number of illegal movements was not enough to stop these unofficial flows.

In response to the long-term presence of Syrian refugees in Turkey, civil society organizations started organizing themselves through developing strategic objectives and goals to serve and respond to the refugee needs through different aspects. So, NGOs and

INGOs as well as governmental organizations provide services to support and help Syrian refugees, to facilitate their integration into the host community. Further elaboration per sector is explained below.

4.1 Access for Health

In 2013, Turkey and the European Union signed the Readmission Agreement of Third World Country Citizens. According to the agreement, illegal refugees readmitted to Turkey will be held in removal centers and will be able to stay in these removal centers for 12 months until they return to their country of origin. During this time, Turkey is authorized to provide health services to these illegal refugees. Turkey has a limited number of removal centers at the time the agreement was signed. Once the agreement comes into force, European countries will send back a huge number of refugees, mostly Syrians, who crossed into Europe via Turkey. For this reason, Turkey is obliged to improve itself in matters such as health services in order to be able to send refugees to their countries safely.

As mentioned above, due to suffering encountered by refugee population during the civil war, a number of health diseases have erupted in these populations starting from malnutrition, communicable diseases, infectious diseases from lack of vaccination, and most importantly mental disorders such as post-traumatic stress disorder, depression, mania, etc...

Healthcare is an essential pillar in the overall well-being of Syrian refugees. The Turkish Ministry of Health established health facilities in temporary accommodation centers called “temporary health facilities”. Providing 24\7 hours services with temporary allocations within this framework interpreters can also be provided only to serve refugees under temporary protection.

All legally registered Syrian refugees have access to these health facilities which are completely run by the Ministry of Health. In 2015, health facilities have been established in their hosting localities, and in order to break the language barrier, it is recommended to have interpreters in all these centers. At the beginning of 2016, the European Union and the Ministry of Health designed a health project that has been

implemented, it aims to improve migrants' access to health services. Health services started to be provided for refugees under temporary protection without the requirement of registration.

This project aims to increase the number of health centers for refugees, in addition to increasing the employment of refugees within the health system of refugee and providing the necessary training. As of 2017, Bab-1 Healing Migrant Health Promotion Centers have been established within the scope of this project. In 2011, refugees benefited from health services for a fee. This situation changed in 2013, they began to benefit from health services free of charge. With the protocol signed between the AFAD and the Ministry of Health. (Rana MOLBAY 2016-70).

4.2 Access for Employment and Self-employment

In 2013, in the context of refugee integration, especially that the residents of Syrian Refugees will be for a long period, and they need an income for their family. From 2012 to late 2013, the influx of Syrian refugees was a regional employment shock. Therefore, refugees influence the labor market although that they did not have an official work permit; and due to the constraints for obtaining work permits and language barriers refugees work in the informal sector. However, as they provided inexpensive, informal unskilled labor" (Ceritlioğlu et. al, 2017). Turkish government began to introduce new policies and practices that cope with the new situation, for example, arrangements have been made to make it easier for Syrian refugees to obtain work permits.

With the Regulation on Work Permits of Foreigners Under Temporary Protection, published in 2016, the condition for obtaining work permits for Syrian asylum seekers were regulated. With the regulation, Syrian refugees were granted the right to apply for a work permit. Syrian asylum seekers who are provided with temporary protection 6 months after their registration can apply for a work permit. While arranging the conditions for obtaining work permits for Syrian refugees, it was considered that the employment of Turkish citizens would not be harmed.

The new law on work permits has been implemented, which allowed refugees to apply for work permits, but nevertheless the number of refugees who obtained work permits was less than 5 percent of the total Syrian workforce (Sunata & Tosun, 2019).

One of the big problems facing the employment of asylum-seekers are the inability to overcome the negative perspective of the local community. Sharing economic prosperity in hosting countries is something indigenous peoples do not want. In parallel, the situation of residents' unwillingness to share limited job opportunities with Syrian refugees has emerged. The initial shortage of work permits caused immigrants to settle the wages offered to them.

The fact that asylum seekers had no choice resulted in wages being significantly lower. The lack of work permits for asylum seekers also led to their employment in labor-intensive jobs, regardless of their level of education. In 2014, the Syrian refugees established Rızık Employment Office in order to help Syrian refugees deal with the problems they face in their working lives and prevent skilled refugees from working in unskilled jobs. Although it was effective in Şanlıurfa, legal regulation was required by the Turkish state (Molbay, 2019).

Turkish employers are taking advantage of the informal labor of refugees in terms of creating a cheap labor force. The work sometimes causes conflicts between the NGOs trying to prevent the informal labor and the owners of capital. The activities of NGOs in the defense of workers' rights remains limited. Because the work of NGOs is incompatible with the links between the state and capital.

In addition, these organizations' actions to improve working conditions may result in the dismissal or legal punishment of Syrian workers. Syrian refugees also avoid entering legal conflict with the state or employer for fear of dismissal or deportation. This heightened fear also prevents them from working together to improve working conditions. There is an increase in xenophobia in Turkey, especially against Syrian refugees. One reason for this hostility is the increase in the number of Syrian refugees working informally. Residents complain that they cannot find work due to the increasing number of refugees (Phillimore, 2012).

Turkey defends the rights of migrant workers and provides them with accommodation, food, and medical support in accordance with the EU-Turkey agreement signed in March, which also states that work permits can be granted to refugees under temporary protection. Therefore, those with or without a work permit. The number of

refugees workers in any workplace should not exceed 10% of the Turkish citizens employed there unless the employer proves that there are no qualified Turkish citizens who can do the same job.

In addition, the Ministry of Family, Labor, and Social Services of the Republic of Turkey can also intervene with Turkish citizens such as priority or limit the number of Syrian employees.

4.3 Access for Education

In order to facilitate the integration of refugees, in 2014, the legal framework for education services for Syrian refugees was drafted. Within this legal framework, various educational centers have been established. The government and civil society organizations formed temporary education center; refugees did not prefer Turkish education despite the possibility of Syrian refugee children getting education in Turkish schools. For this reason, the number of Syrian refugees enrolled in Turkish schools remained limited

One reason for this is that some Syrian refugee children do not have sufficient proficiency in the language to receive a Turkish education. As a solution to this problem, temporary education centers were opened by AFAD and the Ministry of National Education so that Syrian refugees inside and outside the temporary residence centers could receive education with the Arabic curriculum.

NGOs played a role in financing these centers. Language barriers as well as curriculum system, in addition to the instability of families' financials affect the enrollment of refugee into the Turkish school. Because of that here the role of some NGOs emerged, in order to register Syrian students without identity cards, OKDER (Okmeydan| Association) mobilized the media and enabled them to register as guests in the schools (Sunata and Tosun 2019:13).

On the other hand, in 2016, to prevent child labor and ensure the education for children from Syrian refugees with the cooperation of the Ministry of National Education and UNICEF implemented a "Project to Support the Integration of Syrian Children into the Turkish Education System". Thus, the temporary education centers that were funded

by non-governmental organizations were seized by the Ministry of National Education. As a starting point for Syrian refugees to continue their education in public schools considering that they had obtained sufficient Turkish education from the centers. Thus, the students who started their education in these centers were smoothly enrolled in public schools. Over time, all refugees were included in public schools.

To follow up on the international students' courses, grades, and absenteeism, An Information System (YÖBİS) has been established by the Ministry of National Education. through this system. while the students who continue their education in temporary education centers are followed up through this system as well. Through a decision of the Executive Council of the Higher Education Council In 2015, it was reported that 8 universities identified in the border area can open programs providing education in Arabic or another language for Syrian refugees. Syrian refugees who continue their education in universities will be exempted from contribution fees and tuition fees will be covered by the Presidency of Turks Abroad and related communities. At the beginning of the 2016-2017 academic year, the government decided to close the temporary education centers, a law was announced to gradually include Syrian children as part of the Turkish educational system (Sunata & Tosun, 2019).

The Foreign Academics Information System (YABSİS) was established by the Higher Education Institution which hired Syrian refugees as academics in the fields in which they are qualified according to their education level.

Adult Syrian refugees are trained in open courses at public education centers. Some of these trainings are vocational training with the aim of providing a career to asylum seekers. In public education centers, for Syrian refugees who are out of education age, in addition to vocational and Turkish language training, as well as training of foreign language courses, sports, personal development, art, and design.

These courses are considered important especially that it helps and assist refugees learning the Turkish language and communicating in their daily life, mainly for Syrian refugees who are out of education age. on other hand, those services provided by public education centers are useful in terms of contributing to social development, taking advantage of their free time by acquiring a hobby, and making this skill a profession

through acquiring manual skills as well help out the process of refugee integration within the host community.

Aside from facilitating Syrian refugees' access to services and enabling them to share their problems more smoothly and easily, the Directorate General of Migration Management has set up "a foreigners' call center" with the employment of Arab translators. (Rana Molbay 2019)

4.4 Access for Social Services

Syrian refugees under temporary protection receive social and psychosocial support services from the Ministry of Family, Labor, and Social Services. This is considered important because of the psychological disturbances the Syrians went through from war or migration journey.

At the same time, one of the most important activities of the ministry is to determine the basic needs of Syrian refugees and to define social policies to meet these needs. Studies are conducted for disadvantaged groups such as women, children, and the disabled among Syrian refugees, the elderly and disabled among the Syrian refugees are given the opportunity to stay in nursing homes. Unaccompanied Syrian children asylum seekers are placed in child support centers of the Ministry of Family, Labor and Social Services (TBMM, 2018: 81-83).

The Ministry established "Community Centers" in order to perform preventive protection, education, development, orientation, and rehabilitation of Syrian refugees in line with the problems caused by war or migration. In 2015 the "Turkish Red Crescent Community Center Project" was issued by the Ministry of Family, Labor, and Social Services, to provide psychosocial support, orientation, and training services to Syrians under temporary protection living outside the country (Korać, 2003).

In terms of language barriers and in order to prevent Syrian women refugees from being subjected to violence within the scope of the Humanitarian Aid Program for Combating and Responding to Gender-Based Violence, civil society organizations

conducted activities for Syrian women refugees by providing Turkish-language and handcraft classes.

Due to the difficult situation that refugee has been through in their own crisis some civil society organizations used to organize a session providing psychological support for Syrian women refugees. These noteworthy attempts are considered as successful examples and sufficient by civil society organizations one of the benefits that give civil society organizations a good value is that they work in a specific area by focusing on a target group with certain needs and capabilities, which makes their work more smoothly and effectively, which play an important and significant role in the context of the refugees' integration process (Türkay, 2019).

Even though the Turkish government has adopted official laws and certain rights that has been provided by different agencies, such as legal protection, healthcare and education, refugees still face issues in access to these rights due to various reasons such as language barriers, registration concerns, transportation fees, etc. Government and civil organizations faced challenges in the integration process of Syrian refugees. For example, some organizations implementing activities at the borders faced challenges such as imperious arrests by government forces in Syria while distributing humanitarian relief to the persons concerned.

5. Multi-Level Governance Approach to Refugee Integration: Implications for Turkey

In recent years, governance become a crucial concept in the study of political responses to immigrant integration (Schiller, 2018). Indeed, current trend in refugee integration literature indicating the importance of governance approach including multi-level governance, network governance and collaborative governance. One important aspect of governance approach is that governance constitutes actors not only from public but also private, voluntary and community sectors (*OECD, 2019*).

Studying the development and implementation of refugee integration policies in terms of multi-level governance perspective has become a prominent feature in the field of immigration literature. A recent OECD report stated the necessity of multi-level governance arrangements by saying that: “No central government can ensure integration without working with other actors. The UN Global Compact on Refugees recognizes the role of relevant stakeholders, including local authorities, civil society and the private sector, among others. Similarly, the UN Global Compact for Safe, Orderly and Regular Migration calls for national integration policies to include local authorities and, as appropriate, civil society organizations, employers’ and workers’ organizations and other stakeholders, such as third sector organizations and social enterprises. Sub-national levels of government such as local authorities have a role to play and need to be involved. A whole of society approach is necessary, sharing responsibilities according to appropriate multi-level governance arrangements.” (*OECD, 2019*)

Before conceptualizing multi-level governance in more detail, it is better to explore the concept of governance.

5.1. The Concept of Governance

The concept of governance has been used very often since the previous decade and has become a common concept in social sciences. The concept, stemming in the field of political science, is defined in various ways. For instance, Schiller (2018) sees governance as an empirical phenomenon as well as an analytical concept. According to Schiller (2018) in the definitions of governance there are three key aspects in common. First of all, governance includes actors from public, private and voluntary sectors.

Therefore, the boundaries between private and public and between governmental and non-governmental actors are blurred. Secondly, governance involves the interaction and interrelationship of a number of autonomous but interdependent actors.

Actor's interactions can take formal structural arrangements such as partnerships as well as informal coalitions. Lastly, as an empirical concept governance is a tool in achieving a common objective, such as the delivery of public services or solving societal issues. It is a negotiation mechanism for formulating and implementing policy (Schiller, 2018).

Caponio and Jones-Correa (2018) defines governance as a process of governing through horizontal networks linking together state actors at different levels of government and (but not necessarily) non-state actors (Caponio and Jones-Correa, 2018:1998). In this descriptive meaning, governance implies negotiation and cooperation in contrast to compliance in hierarchical relations. Furthermore, governance also involves coordination and collaboration among actors.

5.2. The Concept of Multi-Level Governance

The concept of multi-level governance (MLG) was first introduced by Gary Marks (1993) in the early 1990s, to explain the increasing prominence of subnational authorities in the decision-making and implementation processes of EU politics. MLG has been adopted, especially by EU and global institutions (such as the World Bank), as a benchmark for good practices in policy formulation and implementation. Later on, the concept of multi-level governance was employed to other fields including immigration and migrant integration field.

The various definitions for multi-level governance concept have been proposed in the literature. Multi-level governance can be comprehended as “the dispersion of authority away from central government – upwards to the supranational level, downwards to subnational jurisdictions, and sideways to public–private networks.” (Panizzon & van Riemsdijk, 2019).

Caponio (2019:184) similarly defines the concept as “a process of state authority dispersion across different levels of government and/or non-state actors.”

Multi-level governance (MLG) approach highlights the reality that all states are framed under multiple levels of government. In addition, public policy is necessarily the result of the interactions between institutions and organizations operating at different levels. (Caponio and Jones-Correa. 2018:1995).

Implementation of integration policies through governance structures incorporates both vertical and horizontal dimensions. The MLG approach provides thorough sight into these structures, because it explicitly recognizes that policy-making and implementation derives from interactions between levels of government (vertical), and state and non-state actors (horizontal) (Careja, 2019).

Caponio and Jones-Correa (2018) stated that “States have attempted to shift their responsibilities on migration up, i.e. towards international and supra-national institutions; out, i.e. towards non-public actors; and down, i.e. towards local-level authorities; on the other, international institutions, local-level authorities, and civil society organizations have mobilized on their own in order to gain influence over debates and policies around this ‘wicked’ policy issue (Scholten, 2018).

MLG stands exactly at the intersection of these multiple processes of activation from above, i.e., from the state and from EU and supra-national institutions, and from below, i.e., from lower tiers of government and nonpublic actors.” (Caponio and Jones-Correa, 2018:1996).

According to Caponio and Jones-Correa (2018) there are at least three minimal requirements which should be achieved to consider a specific policymaking arrangement as an instance of MLG. They are as follows:

1. It must oppose vertical, state-centred formal hierarchies of distribution of power and responsibility.
2. Actors in MLG arrangements must be interdependent in order to ensure that policies are not carried out by just one level of government but requires the involvement and consultation of all other tiers as well as nonstate actors.
3. Interaction must entail a degree of bargaining and negotiation among all of the involved institutions and actors (Caponio & Jones-Correa, 2018:1996).

Some scholars attempted to elaborate further on the main dimensions of the concept. (Caponio & Jones-Correa, 2018) summarized converging elements in the definitions of MLG as follows:

1. Inclusion of diverse governmental levels, i.e., the multilevel aspect.
2. Inclusion of diverse non-governmental actors at different governmental levels.
3. Origination and emergence of sophisticated, heterogeneous, and non-hierarchical networks among autonomous and yet interdependent actors.

The initial couple of elements might be considered as uncontroversial, however the status of the horizontal dimension of MLG, i.e., of nongovernmental actors, remains vague in many aspects. As for the third element, interdependence among actors' pleas that non-governmental actors cannot be effectively excluded from direct participation in policy processes as their opinion and support is essential the success of the process (Caponio & Jones-Correa, 2018:1998).

5.3. The Important Role of Local Actors

At the beginning of the last century, a new angle started to gain momentum, emphasizing the core of local level as the appropriate locus for the analysis of integration dynamics.

There is a huge connection between MLG and the local governance in the area of immigration policies. Latest studies direct focus to the local level, which has become more significant in the area of migrant integration. The literature indicates that local administrations play an important role. This is mainly because most immigrants reside in cities and integration processes and related problems take place in cities. Consequently, cities increased their activity over the past years became highly autonomous, developing their own policies focused on immigrant integration (Alexander 2007). As a local actor, municipalities can play a crucial role in putting national integration policies into action and fostering integration at a local level (e.g. support in finding work, participate in the local culture).

It is considered that the local level is also a driver of innovation. Studies show that local level of governance drive policy innovation. Innovation can be erupted via many means including best practices from similar contextual countries, evidence-based policymaking, research-policy dialogues, etc. In addition, innovative projects obtained from local level usually make their way into national policies, and thus fostering policy innovation as well.

In relation to the study of migration refugee in Denmark stated that cities that has corporate status and local government with sufficient resources and extensive experience dealing with diverse populations develop integration policies that completely differ from the national one and adopt measures reflecting local needs and interests (Careja, 2019). In addition, Careja (2019) studied the Danish experience to conduct a comparative study to identify how the local authorities in a municipality has started to pay closer attention to integration interaction with local non-state actors and with the central government in their effort obtain a centrally decided goals and local priorities. Careja relied on theoretical constructs derived from the multi-level governance framework (Careja, 2019:1328).

Scholten and van Breugel (2018) argues that refugee integration governance is increasingly observed as a domestic concern. Initially, the role of local governments in migrant integration governance was solely to implementation and operationalize national policies, but later on, local governments started playing a role in the policy-making process. Different integration programs have been drawn to facilitate and encourage collaboration between the various levels of government. For example, the German National Action Plan on Integration, the French ‘Local strategic Partnerships’ (France) ‘Urban Contracts for Social Cohesion (CUCS) and the UK ‘Local Area agreements’ bringing together state and non-state actors in their efforts to improve the neighbourhoods (Scholten, 2018). Similarly, it is argued that refugee tragedy has toughened a ‘turn to the local’, whereby cities have ‘decoupled’ from national integration policies to formulate their own ‘localist’ policies (Caponio & Jones-Correa, 2018).

City networks not only engage horizontally with migrant associations and NGOs in network governance (Careja, 2019), They also interact vertically with global institutions, through formal representation in the GFMD and informal consultations regarding the

GCM. Several civil society organisations (CSOs), like the International Catholic Migration Commission and the Migration and Development Civil Society Network (MADE) ‘orchestrate’, jointly with the UN, coalitions with lower-level national migrant CSO.

An inverse development to ‘de-coupling’ is observed in Switzerland where the national government supports local civil society’s advocacy at the global level. Civil society actors have broadened their range of interaction due to the ‘crisis’, and scholars further argued that engagement of civil society actors is better comprehended by the MLG model than through network governance f.

In recent years, there has been a shift towards decentralization of immigrant integration policy frameworks. Jensen (2018) argues that trends pointed out towards raised multi-level governance. Although decentralization is a common trend, particular policy implications are highly diverse, contingent on the existing national traditions for decentral policy updates (Maan et al. 2015: 31). The implication is substantial discrepancies between cities within a country in integration governance, plus between the local and the national level, or between neighbourhoods.

In several countries, for example the UK and Spain, the local level policy development of integration policy has been prominent for quite some time, with more recent amendments constituting a continuation of long-term decentralization mechanisms. An example is ‘Creating the Conditions for Integration’, the 2012 policy framework for integration in Britain (DCLG 2012). Launched by the Department for Communities and Local Government, the document stated that ‘Instead of large-scale, centrally led and funded programs, we want to inspire and enable civil society and local areas to take action on integration issues that are important to them’ (DCLG 2012: 19). (Jensen, 2018:77 in Peter Scholten, I. van Breugel (eds.).

The previous years have been characterized by a drift from state-centric to more polycentric integration governance approaches, with more emphasis on the local. (Jensen, 2018:80).

The multilevel governance literature focuses on the collaboration of state and non-state actors for developing and implementing integration policies. For example, in a

Swedish case study, (Ljung, 2013) conducts a research on the local cooperation agreements set up by the administration with other public and private actors and their effect on the labour market integration of immigrants.

5.4. The Important Role of Civil Society Organizations

Presence of efficient and effective civil society actors is essential in coping with the huge burden emanating from recent refugee crisis. Civil society is a comprehensive term that includes all the non-state actors ranging from small-scale immigrant associations to local, national and international NGOs. The terms ‘NGOs’ and ‘CSOs’ are generally used interchangeably. This study also uses the terms interchangeably.

It can be argued that traditionally civil society in Turkey is weak because of predominance of strong state tradition, state-centered policies and highly centralized administrative structure. However, in Turkey civil society organizations became more visible and gained importance following the 1999 Marmara Earthquake which resulted in the death of more than 17,000 people. This is mainly because the devastating earthquakes in the Marmara region showed that the organizational capacities of public institutions were inadequate to cope with the disaster. In order to fill the gap civil society organizations helped urgently the people in need whom official actors cannot reach.

Sunata & Tosun (2018) states that the second big increase in the number of CSOs was seen after the Syrian refugee influx starting from 2011 onwards. In response to the presence of refugees in Turkey, there has been a considerable increase in the number of NGOs. The number of registered NGOs has increased from 88,646 in 2011 to 111,307 in 2017. In addition to the emergence of newly established voluntary organizations, there has been pattern of existing CSOs adapting their work to deal with Syrians through either increasing or changing their activities (Sunata & Tosun, 2019). Because of the shortcomings regarding legal and institutional framework and the urgent need of refugees, the activities of non-governmental organizations (NGOs) in Turkey have a prominent role within the context of Syrian refugees.

In general NGOs those engaged in refugee and migrant-related issues, provide basic services such as humanitarian aid, safety or welfare services to refugees and migrants. They can be summarized as follows:

1. Providing food and health services.
2. Delivering social and humanitarian services.
3. Implementing sustainable development programs.
4. Providing basic services in countries of origin (Sunata & Tosun, 2019).

Sunata & Tosun (2018) developed general classification of NGOs operating in refugee and migrant-related issues. They created four kinds of NGOs by taking into consideration five key factors: (i) field of activity, (ii) funding, (iii) activation, (iv) sphere of influence and (v) background of volunteers. (2018:689).

The first classification represents the NGOs which are operated by migrants or refugees. These NGOs are generally focused on activities that migrants require in their receiving countries such as education services. The second classification of NGOs consists of the organizations whose mandate, sphere of influence and activities are localized and has limited funding capacity.

They can be called as local NGOs. Local NGOs are usually active within their local area, and they provide services to a small number of people of concern. The Third one is international non-governmental organizations (INGOs). These are large-scale highly funded organizations operating in numerous countries and locations. These are involved in the activities, aiming at assisting refugees in their country of origin or in different countries.

Even though they do not focus on delivering humanitarian assistance to refugees or their founding mission is not about refugee-related issues, they can amend their work later to alleviate the hardships derived from the humanitarian crisis going on in a particular country.

What makes this group of NGOs noteworthy is that they are able to cultivate projects with important actors in the field and they receive significant donations so that they can internationally operate in a professional manner. The last classification represents professional NGOs with local activities. Professional NGOs have expert staff and operate on a prominent manner.

Unlike INGOs, they continue to operate only at the local level, regardless of the size of their funding. Because of their international partners, they make use of their international funding and of professionalism for operating local community centers for the refugees (Sunata & Tosun, 2019).

5.5. Implications for Turkey

In line with recent trend on literature on migration and integration this study argues that developing and implementing refugee integration policies is a multilevel policy issue and need to be investigated in terms of multi-level governance approach.

Schiller offers two main elements characterizing the various forms of immigrant integration governance. The first one is the division of power among the various state and non-state actors. State or non-state actors can have a stronger or weaker role in governance interactions and can lead or follow the development of policies. The second element covers the organizational variances between forum of interaction, which can be organized with a high or low intensity (Schiller, 2018:206).

It can be said that in Turkey, immigrant integration governance is based on top-down approaches because policies and content are designed at the national level. This is mainly because Turkey is a unitary state and traditionally has a strong state tradition.

In terms of non-governmental organizations, it can be said that the Syrian refugee crisis has brought vitality to non-governmental organizations in Turkey. There has been a huge increase in their number. In other words, with the influx of Syrian refugees, civil society organizations have flourished in Turkey. Moreover, because of humanitarian crisis that Syrian refugees face, the aid of international non-governmental organizations in Turkey increased.

They developed cooperation with national and local non-governmental organizations through funding and developing partnerships. Such cooperation and collaboration with INGOs increased the capacity of local NGOs. The proliferation of civil actors in numbers and their partnership with INGOs indicate that non-governmental organizations are crucial actor in migration governance that cannot be ignored.

Therefore, non-governmental organizations are an important stakeholder that should cooperate in the formulation and implementation of integration policies. Central and local authorities should take this into account. This also shows that Turkey should reconsider its state-centered and top-down hierarchical administrative structure and accommodate the multi-level governance approach in migration governance.

So, in Turkey, in the process of refugee integration, local governments and other local actors should have a more prominent role. Central government should encourage and provide legal and institutional mechanisms.

When we look at the activities of civil society organizations regarding Syrian refugees in Turkey, with the influx of Syrian refugees, the numbers of civil society organizations significantly increased. These actors are extremely diverse in their levels of professionalization, relationship with the state, sources of funding, and agendas. Kahraman & Taniyıcı (2018) observed that from the beginning the most active CSOs are 'faith' based non-governmental organizations.

On the other hand, non-governmental organizations based on 'rights' operate with the financial support they receive from many international actors. In addition, professional associations, trade unions and political parties also engage in various activities (Kahraman & Taniyıcı, 2018).

Another important development has been huge increase in aid provided by international organizations in order to meet the needs of Syrian refugees and to facilitate the integration of them. “International organizations including UN agencies; the Bureau of Population, Refugees, and Migration (BPRM); the European Commission’s Humanitarian Aid and Civil Protection Department (ECHO); as well as international NGOs such as the Danish Refugee Council (DRC) and Mercy Corps, have funded community center projects that are usually implemented by their local Turkish counterparts.” (İçduygu & Şimşek, 2016:65).

6. Conclusion

Turkey remains to be one of the largest refugee hosting areas in the globe, on daily basis the refugee caseload worldwide continues to increase due to various factors including war, violence and natural disasters hitting skyrocketing records. Turkey currently harbors nearly 4 million registered Syrian refugees as well as more than 300,000 refugees from other nationalities.

It can be argued that traditionally civil society in Turkey is weak because of predominance of strong state tradition, state-centered policies and highly centralized administrative structure. However, in Turkey civil society organizations became more visible and gained importance following the 1999 Marmara Earthquake which resulted in the death of more than 17,000 people. This is mainly because the devastating earthquakes in the Marmara region showed that the organizational capacities of public institutions were inadequate to cope with the disaster. In order to fill the gap civil society organizations helped urgently the people in need whom official actors cannot reach.

The Republic of Turkey is a signatory to the 1951 Refugee Convention and 1967 Protocol, acting as a transit for refugees until being considered for relocation to a third country as the most preferred durable solution. Turkey has been undertaking massive legislative and institutional reforms to establish an effective asylum system in compliance with the international standards.

In 2013, the Republic of Turkey launched its first asylum law, the Law on Foreigners and International Protection, which was endorsed by the Parliament and entered into force on 11 April 2014. The Law states the main cornerstones for the Turkish asylum system and establishes the Directorate General of Migration Management (DGMM) which acts as the central regulating entity in charge of policymaking and management of all foreigners residing in Turkey.

On the 22nd of October 2014, Turkey adopted Temporary Protection (TP) Regulation, which layout the rules and regulations as well as standard operating procedures for those who are granted temporary protection status in Turkey.

The Syrian refugee crisis has brought vitality to non-governmental organizations in Turkey. There has been a huge increase in their number. With the influx of Syrian refugees, civil society organizations have flourished in Turkey. Moreover, because of humanitarian crisis that Syrian refugees face, the aid of international non-governmental organizations in Turkey increased.

In Turkey, immigrant integration governance is based on top-down approaches because policies and content are designed at the national level. This is mainly because Turkey is a unitary state and traditionally has a strong state tradition.

The study reached several conclusions, including that due to its unitary state structure, strong state tradition and highly centralized bureaucratic structure, it is difficult to say that Turkish public administration system has the mechanisms to ensure effective participation of the civil society.

Moreover, it is also difficult to say that there is a strong civil society tradition in Turkey even though the number of non-governmental organizations has increased in recent years. The weakness of civil societal and individualist elements vis à vis the state can also be seen another constraint in developing collaborative arrangements and establishing effective partnerships with non-state actors.

Therefore, the study indicates that the proposal to reconsider the hierarchical administrative structure centered around the state and from top to bottom and to accommodate the multi-level governance approach in migration governance can help the state and migrants in achieving the objectives of integration and integration policies.

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CURRICULUM VITAE

Name and Surname: Munira MOHAMMED

Language: English, Arabic, and Turkish

Place/Year of Birth:

E-mail.:

Education

☐ **2011-2016:** Graduated bachelor degree of Organizational Management in National Ribat University, Khartoum, Sudan.

Work Experiences, Internship, Volunteer, ans Awards

- ☐ January-June 2017: Assist Organization – Education - Khartoum
- ☐ June - December 2016: Labina Organization – Program Officer - Khartoum
- ☐ 2015: Faisal Islamic Bank – Internship – Khartoum
- ☐ 2015: Aldawa Al-Islamiya Organization – Volunteer – Khartoum
- ☐ 2018: Awarded Turkish Scholarship