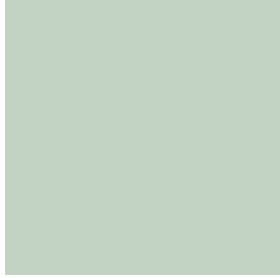


UPDATE ON 2024



TÜRKIYE



COUNTRY REPORT

JULY 2025

Acknowledgements & Methodology

The original report and first update were researched and drafted by Refugee Rights Türkiye and edited by ECRE. The updates since 2017 have been researched and drafted by an independent consultant and edited by ECRE and by an independent consultant.

The 2024 update of the report draws on desk research and information collected from civil society organisations, academia, and legal practitioners from cities across Türkiye. Access to official information on the situation of persons under international or temporary protection in Türkiye remains limited to date. The details of the stakeholders consulted remain anonymous in the report due to the possibility of receiving confidential or sensitive information during the interviews with the stakeholders who closely work with the refugee population, including the most vulnerable groups.

The information in this report is up-to-date as of 31 December 2024, unless otherwise stated.

The Asylum Information Database (AIDA)

The Asylum Information Database (AIDA) is coordinated by the European Council on Refugees and Exiles (ECRE). It aims to provide up-to date information on asylum practice in 25 countries. This includes 19 EU Member States (AT, BE, BG, CY, DE, ES, FR, GR, HR, HU, IE, IT, MT, NL, PL, PT, RO, SE, SI) and 6 non-EU countries (Egypt, Serbia, Switzerland, Türkiye, Ukraine and the United Kingdom) which is accessible to researchers, advocates, legal practitioners and the general public through the dedicated website www.asylumineurope.org. The database also seeks to promote the implementation and transposition of EU asylum legislation reflecting the highest possible standards of protection in line with international refugee and human rights law and based on best practice.



This report is part of the Asylum Information Database (AIDA), funded by the European Union's Asylum, Migration and Integration Fund (AMIF) and ECRE. The contents of this report are the sole responsibility of ECRE and can in no way be taken to reflect the views of the European Commission.



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Glossary & List of Abbreviations

AFAD	Disaster and Emergency Management Authority Afet ve Acil Durum Yönetimi Başkanlığı
CCTE	Conditional Cash Transfer for Education Şartlı Eğitim Yardımı
CİMER	Presidency Communication Centre Cumhurbaşkanlığı İletişim Merkezi
ÇODEM	Child Support Centre Çocuk Destek Merkezi
ECHR	European Convention on Human Rights Avrupa İnsan Hakları Sözleşmesi
ECtHR	European Court of Human Rights Avrupa İnsan Hakları Mahkemesi
ESSN	Emergency Social Safety Net Acil Durum Sosyal Güvenlik Ağı
EUAA	European Union Agency for Asylum
GEM	Temporary Education Centre Geçici Eğitim Merkezi
GHI	General Health Insurance Genel Sağlık Sigortası
HEP	Accelerated Learning Programme Hızlandırılmış Eğitim Programı
HRDF	Human Resource Development Foundation İnsan Kaynağını Geliştirme Vakfı
IPEC	International Protection Evaluation Commission Uluslararası Koruma Değerlendirme Komisyonu
İŞKUR	Turkish Employment Agency Türkiye İş Kurumu (İŞKUR)
LFIP	Law on Foreigners and International Protection Yabancılar ve Uluslararası Koruma Kanunu (YUKK)
MUDEM	Refugee Support Centre Mülteci Destek Derneği
PMM	Presidency of Migration Management Göç İdaresi Başkanlığı
PDMM	Provincial Directorate for Migration Management Valilik İl Göç İdaresi Müdürlüğü
RC	Removal Centre Geri Gönderme Merkezi
RFIP	Regulation on Foreigners and International Protection Yabancılar ve Uluslararası Koruma Kanunu'nun Uygulanmasına Dair Yönetmelik
SGDD-ASAM	Association for Social Development and Aid Mobilization Sosyal Gelişim ve Dayanışma Derneği
SIHHAT	Improving the Health Status of the Syrian Population under Temporary Protection and Related Services Provided by <i>Turkish</i> Authorities Geçici Koruma Altındaki Suriyelilerin Sağlık Statüsünün ve Türkiye Cumhuriyeti Tarafından Sunulan İlgili Hizmetlerin Geliştirilmesi
ŞÖNİM	Centre for the Elimination of Violence Şiddet Önleme ve İzleme Merkezi
SUT	Health Implementation Directive Sağlık Uygulama Tebliği
TAC	Temporary Accommodation Centre Geçici Barınma Merkezi
TPR	Temporary Protection Regulation Geçici Koruma Yönetmeliği
UNHCR	United Nations High Commissioner for Refugees Birleşmiş Milletler Mülteciler Yüksek Komiserliği
YİMER	Foreigners Communication Centre Yabancılar İletişim Merkezi
YKN	Foreigner Identification Number Yabancı Kimlik Numarası
YTB	Presidency for Turks Abroad and Related Communities Yurtdışı Türkler ve Akraba Toplulukları Başkanlığı
YTS	Foreign Terrorist Fighter Yabancı Terörist Savaşçı

List of PMM restriction codes and forms

Restriction codes are issued by PMM but are not governed by clear, publicly available criteria. The implementation and regulation of these codes is not set out in the law but likely in internal circulars and instructions within the administration.

Different letters stand for discrete categories of persons. "A" refers to court decisions, "Ç" refers to temporary entry bans, "G" and "O" to entry bans, and "N" to entry based on work permits. A few examples of restriction codes are listed below:

A99	Convicted by court (and unable to leave Türkiye) Mahkeme kararı (yurt dışına çıkış yasağı)
Ç114	Foreigner under criminal proceedings Haklarında adli işlem yapılan yabancılar
Ç116	Foreigner threatening public morality and public health Genel ahlak ve kamu sağlığını tehdit eden yabancılar
Ç119	Foreigner under administrative fine pursuant to Law 4817 for undeclared employment 4817 sayılı kanun, kaçak çalışan idari para cezası
Ç120	Visa / residence permit violation Vize ve ikamet ihlali nedeniyle
Ç137	Person invited to leave Terke davet edilen şahıslar
Ç141	Entry ban Ülkemize giriş bakanlık iznine tabi
G-43	Smuggling Crimes Kaçakçılık Suçları
G-47	Smuggling Kaçakçılık
G78	Illness Hastalık
G82	Activities against national security Milli güvenliğimiz aleyhine faaliyet
G87	General security Genel güvenlik
H42	Drug-related offences Uyuşturucu madde suçu
N82	Work permit – activities against national security İstizanlı vize – milli güvenliğimiz aleyhine faaliyet
N99	Work permit – other activities İstizanlı vize – diğer
N136	Deportation travel expenses Sınır dışı seyahat masrafları
N169	Failure to Comply with Administrative Obligations Determined by the Ministry Bakanlıkça Belirlenen İdari Yükümlülöklere Uymama
O100	Entry ban and cancellation of asylum Semt-i meçhul yurda giriş yasaklı sığınmacı
V71	Unknown location Semt-i meçhul
V74	Person requiring permission to exit Çıkış İzni Bakanlık – Valilik İznine Tabidir
V84	Short-stay entry (180/90 days) 180/90 İkamet şartlı vize
V87	Voluntary returned foreigner Gönüllü geri dönen yabancılar
V89	Greece – Return Yunanistan – geri dönüş
V91	Temporary protection holder requiring permission to exit Ülkemizden Çıkışı İzne Tabi Geçici Koruma Kapsamındaki Yabancı
V92	Subsequent registered foreigner Mükerrer kaydı olan yabancı
Y26	Illegal terrorist activity Yasadışı örgüt faaliyeti

PMM also has different numbers for forms issued to persons in immigration and asylum proceedings. Examples include the following:

- T1** Deportation / Irregular Entry Form | Sınır Dışı Etme Kararı Tebliğ Formu
- T2** Invitation to Leave the Country Form | Ülkeyi terke davet formu
- T6** Administrative Surveillance Decision Form ordering release from a Removal Centre and reporting obligation | İdari Gözetim Kararını Sonlandırma Tebliğ Formu
- T8** Notification Form for Court Decisions | Mahkeme Kararlarının Tebliğ Formu

Statistics

Overview of statistical practice

Statistics on the total number of international protection and temporary protection beneficiaries, as well as data on the registration of the latter across provinces, are provided by the Presidency of Migration Management (PMM). The number of decisions on international protection issued by PMM is not available.

International protection applicants: December 2024

Total	9,009
Afghanistan	5550
Iraq	1881
Iran	784
Others	794

Source: PPM Website, available at: <https://bit.ly/3Da9Jg4>.

Registered temporary protection beneficiaries: 30 January 2025

	Beneficiaries	Percentage
Total number	2,901,478	100%
Outside Temporary Accommodation Centres	2,841,682	98
In Temporary Accommodation Centres	59,796	2

As of 17 July 2025, the total number of temporary protection beneficiaries is shared as 2,605,508

Breakdown per fifteen main provinces: 30 January 2025

Province	Registered Syrian refugees	Total population in Province	Share of total
İstanbul	497,456	16,153,380	3,08%
Gaziantep	401,179	2,565,313	15,64%
Şanlıurfa	243,562	2,457,526	9,91%
Hatay	210,751	1,755,391	12,01%
Adana	209,363	2,479,661	8,44%
Mersin	182,523	2,120,912	8,61%
Bursa	165,271	3,379,842	4,89%
Konya	116,465	2,436,706	4,78%
İzmir	113,774	4,593,299	2,48%
Ankara	83,555	5,887,037	1,42%
Kahramanmaraş	81,431	1,198,049	6,80%
Kayseri	76,867	1,552,550	5,05%
Kilis	62,498	217,677	28,71%
Mardin	46,097	934,971	4,93%
Kocaeli	50,085	2,152,992	2,33%

Source: PPM Website, available at: <https://bit.ly/3Da9Jg4>.

Main legislative acts relevant to international protection and temporary protection

Title (EN)	Original Title (TR)	Abbreviation	Web Link
<p>Law No 6458 on Foreigners and International Protection, 11 April 2013</p> <p><i>Amended by:</i> Emergency Decree No 676, 29 October 2016</p> <p><i>Amended by:</i> Law No 7070, 1 February 2018 on the regulation of emergency provisions</p> <p><i>Amended by:</i> Decree No 703 on the harmonisation of laws, 9 July 2018</p> <p><i>Amended by:</i> Law No 7148 amending several acts, 26 October 2018</p> <p><i>Amended by:</i> Law No 7196 amending several acts, 6 December 2019</p> <p><i>Amended by:</i> Law no 7533 amending several acts, 21 November 2024</p>	<p>6458 Yabancılar ve Uluslararası Koruma Kanunu, 11 Nisan 2013</p> <p>676 Olağanüstü Hal Kapsamında Bazı Düzenlemeler Yapılması Hakkında Kanun Hükmünde Kararname, 29 Ekim 2016</p> <p>7070 Olağanüstü Hal Kapsamında Bazı Düzenlemeler Yapılması Hakkında Kanun Hükmünde Kararnamenin Değiştirilerek Kabul Edilmesine Dair Kanun, 1 Şubat 2018</p> <p>703 Anayasada yapılan değişikliklere uyum sağlanması amacıyla bazı kanun ve kanun hükmünde kararname, 9 Temmuz 2018</p> <p>7148 Bazı Kanunlarda Değişiklik Yapılması Hakkında Kanun, 26 Ekim 2018</p> <p>7196 Bazı Kanunlarda Değişiklik Yapılmasına Dair Kanun, 6 Aralık 2019</p> <p>7533 Dahiliye Memurları Kanunu ve Bazı Kanunlar ile 375 Sayılı Kanun Hükmünde Kararnamede Değişiklik Yapılmasına Dair Kanun, 21 Kasım 2024</p>	<p>LFIP</p>	<p>http://bit.ly/40YVwyW (EN)</p> <p>https://bit.ly/2ISX0RA (TR)</p> <p>http://bit.ly/2z0t3wh (TR)</p> <p>http://bit.ly/2S5DZzL (TR)</p> <p>https://bit.ly/2W Au8nx (TR)</p> <p>http://bit.ly/2EqekOa (TR)</p> <p>http://bit.ly/2Tsm0zU (TR)</p> <p>https://bit.ly/3IFRCoA (TR)</p>
<p>Law No 6735 on International Workforce, 13 August 2016</p>	<p>6735 Uluslararası İşgücü Kanunu, 13 Ağustos 2016</p>		<p>http://bit.ly/2jtRexU (TR)</p>
<p>Regulation on the Implementation of Law on International Workforce, 2 February 2022</p>	<p>Uluslararası İşgücü Uygulama Yönetmeliği, 2 Şubat 2022</p>		<p>https://bit.ly/3rp0gz7 (TR)</p>
<p>Law No 2577 on Administrative Court Procedures, 6 January 1982</p>	<p>2577 İdari Yargılama Usulleri Kanunu, 6 Ocak 1982</p>		<p>http://bit.ly/1KcDTzg (TR)</p>
<p>Law No 1136 on Attorneys, 19 March 1969</p>	<p>1136 Avukatlık Kanunu, 19 Mart 1969</p>		<p>http://bit.ly/1ftATsUx (TR)</p>
<p>Law No 1512 Notaries, 18 January 1972</p>	<p>1512 Noterlik Kanunu, 18 Ocak 1972</p>		<p>http://bit.ly/1Rw8wyN (TR)</p>

Main implementing decrees and administrative guidelines and regulations relevant to international protection and temporary protection

Title (EN)	Original Title (TR)	Abbreviation	Web Link
Presidential Decree No 4, 15 July 2018	Cumhurbaşkanlığı Kararnamesi 4, 15 Temmuz 2018		https://bit.ly/2HHXsnG (TR)
Regulation No 29656 on the Implementation of the Law on Foreigners and International Protection, 17 March 2016	Yabancılar ve Uluslararası Koruma Kanununun Uygulanmasına Dair Yönetmelik, 17 Mart 2016	RFIP	http://bit.ly/1U90PVq (TR) http://bit.ly/2ANlhVE (EN)
Temporary Protection Regulation 2014/6883, 22 October 2014 <i>Amended by:</i> Regulation 2016/8722, 5 April 2016 <i>Amended by:</i> Regulation 2018/11208, 16 March 2018 <i>Amended by:</i> Regulation 2019/1851, 25 December 2019	Geçici Koruma Yönetmeliği 2014/6883, 22 Ekim 2014 Geçici Koruma Yönetmeliğinde Değişiklik Yapılmasına Dair Yönetmelik 2016/8722, 5 Nisan 2016 Geçici Koruma Yönetmeliğinde Değişiklik Yapılmasına Dair Yönetmelik 2018/11208, 16 Mart 2018 Geçici Koruma Yönetmeliğinde Değişiklik Yapılmasına Dair Yönetmelik 2019/1851, 25 Aralık 2019	TPR	http://bit.ly/44S9Ykd (TR) http://bit.ly/3IC3jMU (EN) http://bit.ly/209ErLI (TR) https://bit.ly/2GynE4b (TR) https://bit.ly/2WPeM1w (TR)
Prime Ministry Circular 2016/8 on the Implementation of Procedures and Principles of Temporary Protection, 5 April 2016	2016/8 sayılı Geçici Koruma Kapsamındaki Yabancılarla İlgili Yapılacak İş ve İşlemlerin Uygulanmasına Dair Usul ve Esaslara İlişkin Genelge, 5 Nisan 2016	TPR Circular 2016/8	https://bit.ly/1S5rETG (TR)
DGMM Circular 2017/10 on Principles and Procedures for Foreigners under Temporary Protection, 29 November 2017	2017/10 Geçici Koruma Altındakilere Uygulanacak Prosedürler ve İlkeler Hakkında Genelge, 27 Kasım 2017	TPR Circular 2017/10	
DGMM Circular 2019/1 on Cessation of Status of Syrians due to Voluntary Return, 7 January 2019	Gönüllü Geri Dönüş Nedeniyle Kaydı Sonlandırılan Suriyeliler Hakkında Genelge, 07 Ocak 2019	TPR Circular 2019/1	
Regulation No 29695 on Work Permit of Applicants for International Protection and those Granted International Protection, 26 April 2016	Uluslararası Koruma Başvuru Sahibi ve Uluslararası Koruma Statüsüne Sahip Kişilerin Çalışmasına Dair Yönetmelik, 26 Nisan 2016	Work Permit Regulation	http://bit.ly/3UtNSc5 (TR) http://bit.ly/2ApyMKf (EN)
Regulation No 29594 on Work Permit of Foreigners under Temporary Protection, 15 January 2016	Geçici Koruma Sağlanan Yabancıların Çalışma İznine Dair Yönetmelik, 15 Ocak 2016	TPR Work Permit Regulation	http://bit.ly/2Aso4H0 (TR) http://bit.ly/2AYqdqH (EN)

Regulation No 28980 on the Establishment and Operations of Reception and Accommodation Centres and Removal Centres, 22 April 2014	Kabul ve Barınma Merkezleri ile Geri Gönderme Merkezlerinin Kurulması, Yönetimi, İşletilmesi, İşletirilmesi ve Denetimi Hakkında Yönetmelik, 22 Nisan 2014	Removal Centres Regulation	http://bit.ly/1Ln6Ojz (TR)
Regulation No 25418 on Legal Aid of the Union of Bar Associations, 30 March 2004	Türkiye Barolar Birliği Adli Yardım Yönetmeliği, 30 Mart 2004	Legal Aid Regulation	http://bit.ly/1dg9Nwd (TR)
Union of Bar Associations Circular 2013/59 on the Legal Aid Service Provided to Syrians under Temporary Protection, 22 July 2013	Türkiye Barolar Birliği'nin Geçici Koruma Altındakilere Verilecek Adli Yardım Hizmetiyle İlgili 2013/59 sayılı ve 22 Temmuz 2013 tarihli duyurusu	Legal Aid Circular 2013/59	https://bit.ly/2IY5JC7 (TR)
Regulation on the Implementation of Law on Notaries, 13 July 1976	Noterlik Kanunu Yönetmeliği, 13 Temmuz 1976	Notaries Regulation	http://bit.ly/1dgakOF (TR)
Union of Notaries Circular Circular No 1 on IDs to be used in notary procedures, 12 June 2016	Noterlik İşlemlerinde Kullanılacak Kimlikler hk Birleştirilmiş Genelge, 12.09.2019	Notaries Circular (1)	https://bit.ly/4IEQ2la (TR)
Ministry of Health Circular No 9468 on Health Benefits for Temporary Protection Beneficiaries, 4 November 2015	Geçici Koruma Altına Alınanlara Verilecek Sağlık Hizmetlerine Dair Esaslar Yönergesi, 4 Kasım 2015		https://bit.ly/45drRVb (TR)
Regulation on Marriage Procedures, 10 July 1985 <i>Amended by:</i> Regulation amending the Regulation on Marriage Procedures, 8 December 2016	Evlendirme Yönetmeliği, 10 Temmuz 1985 Evlendirme Yönetmeliğinde Değişiklik Yapılması Hakkında Yönetmelik, 08 Aralık 2016		http://bit.ly/1KabY1f (TR) https://bit.ly/4mch3MZ (TR)
Ministry of Interior Circular No 40004962-010.07.01-E.88237 on the Marriage and the Registration of Children of Refugees and Temporary Protection Beneficiaries, 13 October 2015	Mülteciler ve Geçici Koruma Altına Alınanların Evlenme ve Çocuklarının Tanınması Konulu Yazı, 13 Ekim 2015		https://bit.ly/4o0SCDQ (TR)
Regulation on the Implementation of Law on Turkish Citizenship Procedures, 11 February 2010 <i>Amended by:</i> Regulation amending the Implementing of Law on Turkish Citizenship Procedures, 12 May 2022	Türk Vatandaşlığı Kanununun Uygulanmasına Dair Yönetmelikte Değişiklik Yapılmasına Dair Yönetmelik, 12 Mayıs 2022		https://bit.ly/44E6k4V (TR)
Ministry of Interior Regulation No 29656 on the Fight against Human Trafficking and Protection of Victims, 17 March 2016	İnsan Ticaretiyle Mücadele ve Mağdurların Korunması Hakkında Yönetmelik, 17 Mart 2016	Anti-Trafficking Regulation	https://bit.ly/1VeEO5 (TR)

Ministry of Family and Social Services Regulation No 29656 on Centres for the Prevention and Elimination of Violence	Şiddet Önleme ve İzleme Merkezleri Hakkında Yönetmelik, 17 Mart 2016	ŞÖNİM Regulation	https://bit.ly/1ppy1L1 (TR)
Regulation No 28519 on Women Shelters, 5 January 2019	Kadın Konukevlerinin Açılması ve İşletilmesi Hakkında Yönetmelik, 5 Ocak 2013	Women Shelters Regulation	https://bit.ly/2Uj8IO0 (TR)
Ministry of Family and Social Services Directive No 152065 on Unaccompanied Children, 20 October 2015	Refakatsiz Çocuklar Yönergesi, 20 Ekim 2015		https://bit.ly/3IHvkTr (TR)
Regulation No 28741 on University Education Scholarship of Directorate General of Foundations, 20 August 2013	Vakıflar Genel Müdürlüğü Yükseköğrenim Burs Yönetmeliği, 20 Ağustos 2013		https://bit.ly/3cjU2qm (TR)
Ministry of Family, Labor and Social Services Circular on the organization and functions of the General Directorate of Disabled and Elderly Services, 25 November 2024	Aile, Çalışma ve Sosyal Hizmetler Bakanlığı, Engelli ve Yaşlı Hizmetleri Genel Müdürlüğü Teşkilat ve Görevlerine İlişkin Yönerge, 25 Kasım 2024		https://bit.ly/453Xxv0 (TR)
Regulation No 2324 on Penal Execution Institutions and Execution of Penalties and Security Measures, 29 March 2020	Ceza İnfaz Kurumlarının Yönetimi ile Ceza ve Güvenlik Tedbirlerinin İnfazı Hakkında Yönetmelik, 29 Mart 2020		https://bit.ly/3pnKmp1 (TR)
Regulation on Alternatives to Administrative Detention, 14 September 2022	İdari Gözetime Alternatif Yükümlülüklerle Dair Yönetmelik. 14 Eylül 2022		https://bit.ly/44jRMYy (TR)

Overview of main changes since the previous report update

In 2024, Türkiye hosted a population of over 2.9 million refugees¹ from Syria under the temporary protection regime and 194,637 asylum seekers and beneficiaries of protection of other nationalities, principally originating from Afghanistan, Iraq and Iran among others.² 9,009 asylum seekers applied for international protection; the majority is from Afghanistan (5,550). Many of the challenges highlighted in the last year's report remain for 2024, however, some events and policy changes in 2024 deepened some of the existing concerns and caused new challenges for displaced people in Türkiye.

In 2024, key concerns in the field of migration and asylum in Türkiye centered on the conduct of public officials, both in individual practices and public discourse. Access to registration and re-registration remained a persistent barrier, while increasing reports of arbitrary decisions regarding the cancellation or deactivation of temporary protection statuses emerged. Stakeholders also highlighted the inconsistency of judicial decisions concerning these cases. Throughout the year, authorities placed significant emphasis on the declining number of registered foreign nationals in the country.³ Some stakeholders have expressed the view that cancellation and deactivation practices may be contributing to this reduction in the number of individuals under temporary protection.⁴ Anti-refugee sentiment intensified around the local elections held in March 2024, further exacerbated by the July 2024 anti-refugee riots in Kayseri.⁵ Kayseri incidents had a long-lasting effect across various provinces, leading many Syrians to refrain from appearing in public due to safety concerns. Additionally, in 2024, for those with valid registration, access to health services under the General Health Insurance (GHI) scheme remained problematic.

A new phase began after December 2024. With the regime change in Syria, it is anticipated that many Syrians may wish to return, given the presumed elimination of persecution risks. As of June 2025, there was no formal announcement regarding the lifting of temporary protection. However, official figures indicate that 250,000 individuals have returned to Syria since December 2024. In addition, following the change in U.S. administration in January 2025, significant funding cuts to international assistance programs were observed. As a result, many NGOs operating in Türkiye had to scale down their operations, which in turn adversely impacted the refugee population's access to services and support. According to stakeholders, NGOs operating in the field have had to scale back their operations, including closing branches and reducing staff by 15% to 60%.⁶

Two years after the earthquake, the acute period is not over yet for both home and host communities, some families cannot still access water, basic needs, and shelter.

Deteriorating Access to Protection and Rights

In 2024, public authorities' practices regarding the status of individuals under international and temporary protection became increasingly arbitrary and unpredictable. Sudden cancellations, deactivations, apprehensions, and rejections created significant uncertainty and hardship for applicants. Individuals with minor or outdated criminal records, sometimes dating back years, or those merely attempting to file a legal complaint as a victim or complainant, were at risk of being apprehended on grounds related to "public order." These practices were further complicated by the opaque application of security codes, which often served as the basis for deportation orders or ID deactivation without clear justification. Even in cases where individuals successfully reactivated their IDs after long legal struggles against wrongful cancellations or deportation decisions, many ultimately gave up and opted for return due to the persistent uncertainty and bureaucratic fatigue. Beyond the actions of government officials, individuals increasingly lost trust in judicial actors as well. In addition to inconsistent rulings from administrative courts, obtaining a positive outcome

¹ PMM, Temporary Protection Statistics, available [here](#).

² UNHCR Türkiye Factsheet September 2024, available [here](#).

³ T.C., Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya, Adres Tahkikatlarından Sonra Suriyelilerin Sayısının 2 Milyon 935 Bin 742'ye Düşüğünü Açıkladı, 20.11.2024, available [here](#)

⁴ Information provided by a stakeholder, April 2025

⁵ BBC Türkçe, Kayseri olayları: Türkiye genelinde gözaltına alınan 1065 kişiden 28'i tutuklandı, 01.07.2024, available [here](#)

⁶ Information provided by multiple stakeholders, March, April and May 2025

from Magistrates' courts in challenges against administrative detention orders became nearly impossible. As a result, many legal practitioners began to question the effectiveness of this remedy.⁷

As a consequence, an increasing number of individuals, regardless of whether they had active IDs, sought to cross Türkiye's western borders irregularly, driven primarily by a perceived lack of future prospects in the country.⁸ Many of those who succeeded, primarily men, left their families behind hoping to find safer means to reunite with them later. This separation often forced children to drop out of school to contribute economically to their household, highlighting the severe social toll of the ongoing uncertainty and restrictive protection environment.⁹

Hostile Institutional and Political Environment

In 2024, migration policies in Türkiye continued to be shaped primarily by security concerns. The Minister of Interior, Ali Yerlikaya, frequently emphasized figures related to the reduction in the number of registered foreigners, the increase in returnees, operations targeting smuggling networks, and the number of individuals prevented from irregularly entering the country. These public statements and policy priorities reflected a predominantly enforcement-based approach, with little acknowledgment of the protection needs of those attempting to cross borders irregularly. In particular, individuals trying to enter Türkiye via the Iranian border continued to face severe risks, including exposure to freezing temperatures, attacks by wild animals, or violence by non-state actors. Despite reports of deaths and serious injuries, such incidents were largely absent from official narratives.

The growing number of Mobile Migration Points also contributed to a heightened sense of insecurity. Individuals fearing random checks or apprehensions avoided leaving their homes, which further limited their access to essential services. However, remaining at home did not always guarantee protection. Some individuals reported that despite staying home for extended periods in anticipation of address verification visits, their IDs were nonetheless deactivated on the grounds that they could not be located.

Return Dynamics and Post-December 2024 Developments

While this report primarily focuses on developments in 2024, it also addresses the significant shifts following the political transition in Syria on 8 December 2024. As of June 2025, there has been no formal public discussion regarding the lifting of temporary protection status in Türkiye. However, Turkish authorities permitted Syrians to realise up to three "go-and-see" visits between 1 January and 1 July 2025, with the stated aim of enabling individuals to assess the feasibility of rebuilding their lives in Syria. The return infrastructure at the Turkish-Syrian border was significantly expanded to accommodate this process. Despite this, according to stakeholders, the majority of those under temporary protection continue to adopt a cautious approach, citing serious concerns regarding the current state of infrastructure, healthcare, education, and overall security conditions in Syria. Furthermore, observed trends indicate that women and children are more inclined to remain in Türkiye compared to men. This is attributed in part to their perception that they enjoy broader rights and greater protection in Türkiye. One of the main challenges observed in the return process relates to custodial disputes. Single parents, predominantly mothers, who wish to return to Syria with their children are often required to present the consent of the father, even in cases where the father has abandoned the family, is untraceable, or has already returned to Syria either voluntarily or through deportation. This requirement has created significant legal and practical barriers, effectively preventing many mothers from returning with their children despite their willingness to do so.

Asylum procedures

- ❖ **Asylum statistics:** In 2024, there were 9,009 applicants for international protection, which corresponds to a 52% decrease compared to 2023.¹⁰ This represents the most significant decline in international protection applications since the introduction of the LFIP and the establishment of

⁷ Information provided by stakeholders, March, April and May 2025

⁸ Mülteci-Der, Belirsizlikle Başa Çıkmak, 24.01.2025, available [here](#)

⁹ Information provided by a stakeholder, April 2025

¹⁰ PMM, International Protection Statistics, available [here](#)

the PMM in 2014. It should be noted that the previous year also saw a significant decrease of 43%, which stakeholders believe does not meet the registration needs in the field and is not considered realistic.¹¹ Afghans were the most represented number of applicants (5,550) followed by Iraqis (1,881) and Iranians (784). According to PMM statistics,¹² 225,831 irregular migrants were apprehended in 2024, reflecting a decrease compared to 2023 (254,008). Afghans continued to constitute the largest group among those apprehended for irregular status, with 65,815 individuals. Syrians were the second most represented nationality, with 50,641 apprehensions. Other prominent nationalities included Palestinians, Egyptians, Turkmens, Moroccans, Uzbeks, Iraqis, and Iranians. While PMM does not publish disaggregated data on irregular entries, the reported figures encompass both individuals intercepted at or near borders and those whose legal status or identity documents were later cancelled by authorities. According to stakeholders, in line with these figures, Afghans remained the most frequently apprehended nationality following irregular border crossings in 2024.

- ❖ **Integrated and Increased Border Control:** The building of 80 percent of the borders of Iran and Syria, and a 1253 kilometer patrol road was completed including 715 patrol routes, 1,282 km of lighting, 36 kilometers of embankments, 368 cameras and sensors, 198 elevator-equipped towers, 362 electro-optical towers, 284 thermal cameras, and 139 reconnaissance and surveillance vehicles. A total of 950 million USD (30 billion TRY) has been spent on border security to date, and a budget of 136 million USD (4.5 billion TRY) has been allocated for 2024.¹³ The increased border control prevented 104,000 irregular immigrants from entering the borders in Türkiye in 2024. The Minister emphasized that 223,000 irregular migrants were prevented from crossing the border in 2023 by the “border eagles”, a special branch of the military responsible for border security. Although this number dropped to 104,000 in 2024, the Minister framed the decline as a success, attributing it to effective measures taken at the source of migration, within Türkiye’s borders, and in preventing irregular exits from the country, stating that “they are not coming to our side anymore.”¹⁴ Following the political transition in Syria on December 2024, the ‘go and see’ visits initially took place through the Çobanbey and Zeytindalı border gates, with Yayladağı later added to the list. The duration of the permission granted for these visits was limited to 15 days. Approximately 15,000 individuals returned to Türkiye after participating in these visits and were issued a V-175 restriction code.
- ❖ **Access to the territory and pushbacks at the borders:** Despite the building of border walls and increasing surveillance along Türkiye’s Eastern border, it did not prevent irregular crossings and instead led to crossings shifting to more dangerous, and mountainous routes or taking place during winter months when the weather conditions are very harsh. At the eastern border with Iran, the pushback practices continued in 2024, particularly targeting single men coming from Afghanistan, who faced more pushback to Iran than other groups. In some cases, they were held for months before being subjected to pushback without being taken to removal centres or the possibility of applying for protection. There are no clear or individual assessments at the border with Iran, and the migrants are often not informed about their rights. In 2024, disturbing reports emerged from the Iran–Türkiye border, including the case of an Afghan refugee who died shortly after being detained and allegedly tortured by Turkish border police before being forcibly returned to Iranian territory.¹⁵ Until December 2024, the border with Syria was closed, and crossings were only allowed for

¹¹ Information provided by multiple stakeholders, February, March, April and May 2025

¹² PMM, Irregular Migration Statistics, available [here](#)

¹³ PMM, İçişleri Bakanı Ali Yerlikaya: “Göçü Kaynağında Durdurduk”, 14 August 2024, available [here](#)

¹⁴ AA, İçişleri Bakanı Ali Yerlikaya, AA Editör Masası'nda soruları yanıtladı, available [here](#).¹⁵ BBC Persian, Afghan refugee dies after being "tortured by Turkish police" at the border with Iran, August 2024, available [here](#)

¹⁵ BBC Persian, Afghan refugee dies after being "tortured by Turkish police" at the border with Iran, August 2024, available [here](#)

individuals who require specific medical treatments and their attendants, for the duration of the treatment period.

- ❖ **Registration:** The registration of applications remained one of the most significant barriers to people seeking international protection in Türkiye in 2024.¹⁶ The provinces where PDMMs were willing to accept applications varied throughout the year and did not reflect a consistent practice. In a total of 1,169 neighbourhoods in 63 provinces where the foreign population exceeds 20% of the Turkish citizen population, were closed to new registrations of foreigners from 2023.¹⁷ This practice continued in 2024. Although registrations did not cease entirely notably for vulnerable persons, they were reported as 'almost impossible' in numerous places. Even when applicants were able to access registration in major cities, the waiting period for referral to another province remained challenging. Inconsistencies in PDMM practices also caused difficulties. In addition to the registration problems, PDMM address verification procedures continued for both international and temporary protection holders. When they were not found at their place of registration, and their IDs became inactive. The situation leads to an increasing number of people becoming undocumented.¹⁸
- ❖ **Voluntary return:** Voluntary, safe, and dignified returns have continued to be a priority policy area for the PMM in 2024, which established its voluntary return programme in 2021. Following the regime change in Syria in December 2024, this policy began to be referred to as voluntary, safe, dignified, and regular returns. From the beginning of 2024 until 8 December, approximately 120,000 individuals were reported to have voluntarily returned to Syria.¹⁹ In the two weeks following 8 December, an additional 23,440 individuals returned, following increased efforts by Turkish authorities to expand border gate capacity—from a daily return allowance of 3,000 to 20,000.²⁰ As of June 2025, the total number of Syrians who reportedly returned voluntarily reached 250,000, while overall return figures surpassed 1,000,000.²¹ However, despite the developments following December 2024 stakeholders have concerns whether they are voluntary or forced returns.²²
- ❖ **Increasing number of deportations:** Interior Minister Ali Yerlikaya stated that 141,000 deportations were carried out in 2024, marking the highest annual figure to date. The minister remarked that they are “competing” with Frontex in terms of deportation figures.²³ Unlike previous years, however, PMM refrained from publicly sharing deportation statistics, instead referring to apprehensions with the phrase 'deportation procedures were initiated.'²⁴ Several reports indicate that in 2024, individuals held in Removal Centers were pressured to sign voluntary return forms,

¹⁶ Information provided by stakeholders, February, March, – April and May 2025.¹⁷ PMM, “İstanbul'da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı” İddialarına İlişkin Basın Açıklaması, 16 July 2023, available [here](#).¹⁸ Information provided by stakeholders, March, April and May 2025.¹⁹ PMM, İçişleri Bakanı Ali Yerlikaya: “Gönüllü Geri Dönüş İşlemlerinde Randevu Sistemi Devreye Alındı, Sınır Kapılarında 7/24 Çalışma Esasına Geçildi”, 25.12.2024, available [here](#).

¹⁷ PMM, “İstanbul'da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı” İddialarına İlişkin Basın Açıklaması, 16 July 2023, available [here](#).¹⁸ Information provided by stakeholders, March, April and May 2025.¹⁹ PMM, İçişleri Bakanı Ali Yerlikaya: “Gönüllü Geri Dönüş İşlemlerinde Randevu Sistemi Devreye Alındı, Sınır Kapılarında 7/24 Çalışma Esasına Geçildi”, 25.12.2024, available [here](#).

¹⁸ Information provided by stakeholders, March, April and May 2025.¹⁹ PMM, İçişleri Bakanı Ali Yerlikaya: “Gönüllü Geri Dönüş İşlemlerinde Randevu Sistemi Devreye Alındı, Sınır Kapılarında 7/24 Çalışma Esasına Geçildi”, 25.12.2024, available [here](#).

¹⁹ PMM, İçişleri Bakanı Ali Yerlikaya: “Gönüllü Geri Dönüş İşlemlerinde Randevu Sistemi Devreye Alındı, Sınır Kapılarında 7/24 Çalışma Esasına Geçildi”, 25.12.2024, available [here](#).

²⁰ X (Twitter), PMM, available [here](#).

²¹ PMM, İçişleri Bakanı Ali Yerlikaya, 2016 Yılından İtibaren Ülkesine Gönüllü Geri Dönüş Yapan Suriyeli Sayısının 1 Milyona Ulaştığını Açıkladı, 28.05.2025, available [here](#).

²² Information provided by multiple stakeholders, March, April and May 2025.

²³ AA, İçişleri Bakanı Ali Yerlikaya, AA Editör Masasında soruları yanıtladı available [here](#).

²⁴ T.C. İçişleri Bakanlığı, Kalkan-25 Operasyonları İle 2 Bin 563 Düzensiz Göçmen Yakalandı, 02.07.2024, available [here](#)

and some were deported despite having pending legal cases against their deportation orders—cases which should have led to the automatic suspension of removal procedures.²⁵

- ❖ **Operations:** In 2024, according to Minister of Interior Ali Yerlikaya, the government intensified its fight against migrant smuggling networks. He stated that 12,088 operations were conducted, resulting in 19,655 individuals taken into custody, 7,539 arrests, 3,102 judicial control decisions, and the confiscation of 8,339 vehicles. Emphasizing the importance of combating migrant smuggling as part of the broader strategy to stop irregular migration at its source, Yerlikaya noted that operations were carried out in coordination with governorates, police intelligence, gendarmerie, public prosecutors, and the Ministry of Justice. He further stated that the authorities aim to ensure all those involved are imprisoned, closely monitor the release dates of those already in jail, and track those who have not yet been detained.²⁶
- ❖ **Mobile migration points:** The Mobile Migration Points, launched on 19 July 2023, have become a key tool in Türkiye's fight against irregular migration. By August 2024, the number of vehicles reached 268, with plans to increase to 350, including 75 stationed in Istanbul. Throughout 2024, over 1.18 million people were asked for identification at these points, resulting in the detection of 126,766 irregular migrants.²⁷ By December 2024, 270 Mobile Migration Points were operating across 81 provinces. Identity checks conducted at these locations rose from 49,999 in the first three months to 182,962 by six months, and 256,377 in the last month of the year. Notably, the percentage of irregular migrants detected at these points dropped sharply from 74.5% to 2.7% over this period.²⁸ Stakeholders emphasized that throughout 2024, Mobile Migration Points were positioned in front of courthouses, hospitals, police stations, and busy city centers. Individuals with deactivated or canceled IDs, security codes, or even criminal records with cases permanently closed years ago encountered difficulties at these points. As a result, many people began to avoid approaching these essential institutions when needed, fearing they might be stopped at a Mobile Migration Point.²⁹
- ❖ **Increased number of rejection decisions:** PMM took 85,125 decisions in 2024, which constitutes a decrease compared to the 94,506 taken in 2023. Despite this decrease, the number of decisions on international protection applications remains significant higher compared to 51,472 in 2022. According to stakeholders, PMM continued efforts in 2024 to conclude assessments of applications that have been pending for 7 to 10 years. While no public data is available, stakeholders report that rejection rates are considerably higher than acceptance rates. One stakeholder noted that PDMMs must obtain PMM approval to accept cases, but they can reject applications independently based on their assessments.³⁰
- ❖ **Annulment of deportation decisions:** In 2024, two Palestinian nationals who admitted to attempting to irregularly cross the Turkish-Greek border and were subsequently apprehended succeeded in having their deportation orders annulled. In its decisions, the İzmir 1st Administrative Court emphasized the ongoing situation in Palestine following 7 September 2023, particularly the continued bombardment of the Gaza Strip and the widespread killing of civilians. The court found that the deportation order had been issued without a sufficient individual assessment of these circumstances. In separate cases involving two Afghan applicants who had both previously worked

²⁵ UTBA, Report on Unlawful Deportation Proceedings, June 2024, available [here](#); Lighthouse Reports, Turkey's EU-funded deportation machine, 11.10.2024, available [here](#).

²⁶ AA, *Ibid*.

²⁷ PMM, İçişleri Bakanı Ali Yerlikaya: "Göçü Kaynağında Durdurduk", 14 August 2024, available [here](#).

²⁸ AA, *ibid*.

²⁹ Information provided by stakeholders, March, April, May 2025.

³⁰ Information provided by multiple stakeholders, April and May 2025.

for the military in Afghanistan before the Taliban's takeover in 2021, the Aydın 1st Administrative Court and the Erzurum 1st Administrative Court annulled the deportation orders. (See: Appeal before the Administrative Court)

Reception conditions

- ❖ **End of the 'satellite cities' concept.** Previously, applicants were referred to cities depending on their profile, in case of having any vulnerability, however recently this implementation is no longer in practice in 2024 as in 2023. As per PMM Circular No. 2022/01 dated 06.06.2022, the term "province of residence" (ikamet ili) is now officially used to designate the province in which an asylum seeker is required to reside, replacing the previously used term "satellite city". The PMM is responsible for informing which cities are open or closed to new registrations. According to the last available list, 62 provinces in Türkiye were listed as open/closed cities for the referral of international protection applicants.³¹ However, they are mostly closed to international protection applications.³²
- ❖ **Agreement between the European Commission and the Government of Türkiye to support the most vulnerable refugees:** The European Commission and the Government of Türkiye signed a €781 million contract to fund a social safety net for vulnerable refugees, marking the largest EU contract with Ankara to date.³³ This new Social Safety Net (SSN) contract extends the Emergency Social Safety Net program, the EU's largest humanitarian initiative, launched in 2016. Over the next three years, the funding will support the basic needs of around two million refugees and benefit the local economy. This brings the total EU assistance to refugees and host communities in Türkiye to nearly €10 billion since 2011. The EU Facility for Refugees in Türkiye is the answer to the EU Member States' call for significant additional funding to support refugees in the country, and manages a total of €6 billion, mobilised in two tranches. The first tranche serves to fund projects that ran until mid-2021 latest. The second tranche serves to fund projects which run until mid-2025 latest (most projects will finish earlier). The main focus areas are humanitarian assistance, education, health, municipal infrastructure, and socio-economic support.³⁴

Detention of asylum seekers

- ❖ **Detention facilities:** As of 2024, there are 32 Removal Centres operating across 25 provinces in Türkiye, with a total detention capacity of approximately 18,780. Throughout the year, around 350,000 individuals were held in these facilities. The centre located in Iğdır, as well as two of the three facilities in Arnavutköy, are listed as temporary Removal Centres.³⁵ In 2024, several reports highlighted serious concerns regarding unlawful deportations and ill-treatment in removal centres.

³¹ For the earlier list of cities as of August 2017, see Refugee Rights Türkiye, *Avukatlar için mülteci hukuku el kitabı*, August 2017, available in Turkish [here](#), 409. ³² Information provided by multiple stakeholders, April and May 2025. ³³ EU signs a €781 million agreement with Türkiye to continue support to most vulnerable refugees, September 2023, [here](#)³⁴ European Commission, The EU Facility For Refugees in Turkey Factsheet, December 2024, available [here](#).

³² Information provided by multiple stakeholders, April and May 2025. ³³ EU signs a €781 million agreement with Türkiye to continue support to most vulnerable refugees, September 2023, [here](#)³⁴ European Commission, The EU Facility For Refugees in Turkey Factsheet, December 2024, available [here](#).

³³ EU signs a €781 million agreement with Türkiye to continue support to most vulnerable refugees, September 2023, [here](#)³⁴ European Commission, The EU Facility For Refugees in Turkey Factsheet, December 2024, available [here](#).

³⁴ European Commission, The EU Facility For Refugees in Turkey Factsheet, December 2024, available [here](#).

³⁵ PMM Faaliyet Raporu

Allegations included individuals being coerced into signing voluntary return forms, deportations carried out before the automatic suspensive effect of pending legal cases could take effect, and instances of physical violence.³⁶ Some accounts also reported the use of so-called “cold chambers” as a form of punishment or coercion, raising serious questions about conditions and accountability within removal centres.³⁷ In 2024, it was observed that many Afghan nationals were held in the Şanlıurfa Harran Temporary Accommodation Center, a facility designated for individuals under temporary protection. Among them were individuals referred from various Removal Centres for the assessment of their international protection applications, as well as others who had been apprehended outside their province of residence—despite the fact that such cases are typically expected to result in a “deemed to be withdrawn” decision.³⁸

- ❖ **Increasing number of transfers:** The number of transfers between the centres increased significantly in 2024. Uninformed, sudden transfers are happening from one centre to another centre in different cities. This practice is problematic and potentially in violation of the right to legal representation, as lawyers are unable to locate their clients. Since the PDMMs do not provide information on where an individual is being held or any guidelines on which profiles are transferred to which locations and when, lawyers are often required to proactively search for their clients across multiple Removal Centres - a process that can take several days.

Content of international protection

- ❖ **Increasing anti-migrant sentiment.** Since 2022, there has been a noticeable rise in anti-migrant sentiment, with increased discussions during the election campaign in 2023 General Election focusing on issues such as voluntary return,³⁹ unwanted immigrants,⁴⁰ and border protection.⁴¹ During the election periods in Türkiye—such as before and after the 2024 municipal elections—anti-migrant sentiment tends to rise, creating additional challenges for refugee communities. In late June and early July 2024, a wave of anti-Syrian unrest broke out in Kayseri following allegations that a Syrian man had sexually abused a young Syrian girl. The incident rapidly escalated into widespread violence, during which protestors raided the homes of Syrian families, set vehicles on fire, and engaged in other acts of aggression. Fourteen police officers and one firefighter were injured during the events. A broadcast ban was imposed regarding the incident and its aftermath. The Minister of Interior later announced that 67 individuals had been detained in connection with the unrest, which extended into early July.
- ❖ **Policy changes in the issuing of permits.** Due to a policy change in 2023 regarding the issuing of residence permits, a number of short-term residence permits applications were denied⁴² causing difficulties in accessing to the international protection application. This problem continued in 2024.

³⁶ UTBA Report

³⁷ Karar, Avukatlardan Geri Gönderme Merkezi için çarpıcı iddialar: göçmenlere ‘Sessiz Oda’ ve ‘Soğuk Oda’ işkencesi, 07 November 2024, available [here](#); Karar, Deprem mağdurlarına çifte darbe: Göçmen aileye sınır dışı kararı, 19 November 2024, available [here](#)

³⁸ Information provided by multiple stakeholders, March 2025.

³⁹ AA, 20.05.2024, Cumhurbaşkanı Erdoğan: Suriyeli mültecilerin ülkelerine dönmelerini sağlayacağız, available [here](#).⁴⁰ BBC News, 06.09.2022, İYİ Parti “Milli Göç Doktrini”ni açıkladı, Akşener tarih verdi, available [here](#).⁴¹ Euronews, 14.03.2024. ‘Kılıçdaroğlu: Suriyeli ve Afganları göndereceğiz, demografik yapının değişmesini istemiyoruz’, available [here](#).

⁴⁰ BBC News, 06.09.2022, İYİ Parti “Milli Göç Doktrini”ni açıkladı, Akşener tarih verdi, available [here](#).⁴¹ Euronews, 14.03.2024. ‘Kılıçdaroğlu: Suriyeli ve Afganları göndereceğiz, demografik yapının değişmesini istemiyoruz’, available [here](#).

⁴¹ Euronews, 14.03.2024. ‘Kılıçdaroğlu: Suriyeli ve Afganları göndereceğiz, demografik yapının değişmesini istemiyoruz’, available [here](#).

⁴² Information provided by stakeholders, March – April 2024.

Applicants whose requests for residence permits were denied continued to reside in Türkiye despite the illegality of their stay, as submitting a lawsuit has no suspensive effect. Migrants from Africa who held residence permit previously face difficulties to renew their permits, consequently they found themselves as undocumented migrants who cannot access basic rights and services due to the fear of deportation.⁴³

- ❖ **Resettlement:** In 2024, UNHCR continued to expedite the resettlement processing of the most vulnerable refugees. More than 11,000 resettlement submissions were made during the year, 79% of which were for Syrian refugees from earthquake-affected regions. To date, over 6,800 refugees have departed to third countries. Around 13 EU countries were expected to participate in the resettlement efforts, including Belgium, the Netherlands, Slovenia, Italy, Finland, France, Norway, and Ireland. According to statistics shared by the Presidency of Migration Management (PMM), participation from all these countries was confirmed - except for Ireland.

Temporary protection

- ❖ **Detention of Syrian nationals:** Following a policy change in 2022, Syrians who enter the country are transferred to temporary accommodation centres in Gaziantep, Kahramanmaraş, Hatay, Kilis, and Malatya. Admission to the temporary accommodation centre is at the discretion PDMM and if rejected from accessing the camp, the only alternative for Syrians is to “voluntarily return” to Syria. Hence, the camps have become a new form of detention facility for Syrians who are either not registered under the temporary protection regime or have had their temporary protection status revoked. Individuals detained in the temporary accommodation centres often face indefinite detention, unlike those in regular detention centres, which have a maximum detention period of up to 12 months. Immigration lawyers believe that the indefinite detention in these centres aims to hinder Syrians from appealing deportation decisions or to coerce them into signing voluntary return forms⁴⁴. It is claimed that majority of Syrians who stay in Kilis and Nizip temporary accommodation centres are returned back to Syria and there are concerns among stakeholders about the voluntariness of these returns⁴⁵. An unpublished circular dated 6 June 2022 outlined four exceptions to the requirement of staying in Temporary Accommodation Centres (TACs): (1) children of individuals exempt from TAC residence; (2) those for whom travel is not advisable due to health conditions; (3) individuals married to Turkish citizens or to foreigners legally residing in Türkiye under a residence permit, work permit, or international protection status, along with their children; and (4) individuals with special needs who are not suitable for placement in TACs, as well as their dependent children. However, the implementation of these exceptions has continued to vary in practice. In some TACs like Kilis Elbeyli, there are claims of individuals being held in cold storage facilities and exposed to physical abuse.
- ❖ **Registration:** Registration continues to be one of the main issues faced by applicants. In a statement published in August 2024, the Ministry of Interior declared that no new registrations of Syrians under temporary protection had taken place since June 2022, effectively closing the discussion on the matter.⁴⁶ In line with this policy, the number of Syrians under temporary protection decreased to 2,901,478 as of 2024.

⁴³ Information provided by a stakeholder, March 2024.

⁴⁴ Global Detention Project, Türkiye: Submission to the Committee against Torture, 12 June 2024, available [here](#)

⁴⁵ Information provided by a stakeholder, March 2024.⁴⁶ PMM, İçişleri Bakanı Ali Yerlikaya: “Göçü Kaynağında Durdurduk”, 14.08.2024, available [here](#)

⁴⁶ PMM, İçişleri Bakanı Ali Yerlikaya: “Göçü Kaynağında Durdurduk”, 14.08.2024, available [here](#)

Content of temporary protection

- ❖ **Increased EU funding:** For 2023 and 2024, the EU has pledged over 2 billion EUR in support for Syrian refugees and their host communities. It was stressed that the EU would continue to collaborate with Türkiye to ensure the delivery of cross-border aid to Syria. As part of the MFF mid-term review package, the European Council on 1 February 2024 agreed to increase by 1.5 billion EUR the Solidarity and Emergency Aid Reserve for the period 2024-2027.⁴⁷
- ❖ **Increasing numbers of apprehensions of temporary protection beneficiaries:** By the end of 2024, there were 50,641 Syrians among the 225,831 people apprehended across the country. The number decreased in 2024, but was still more than double than the same figure in 2021.⁴⁸
- ❖ **1:1 Resettlement scheme:** The EU-Türkiye statement of 18 March 2016 established a specific resettlement procedure (“1:1 scheme”), under which one Syrian national would be resettled from Türkiye to the EU Member States for each Syrian national returned from Greece to Türkiye, taking into account the UN vulnerability criteria. As of March 2024, there are 65,927 persons have been resettled under this “1:1 scheme”, with primary resettlement destinations being Germany, Canada, U.S.A., and France.
- ❖ **Reception:** As of December 2024, ten large-scale camps are accommodating a total of 59,796 temporary protection beneficiaries, spread across eight provinces in Southern Türkiye: **Adana** (Sarıçam), **Hatay** (Apaydın, Yayladağı, Altınözü), **Kahramanmaraş** (Merkez), **Kilis** (Elbeyli), **Osmaniye** (Cevdetiye), **Gazinatep** (Nizip), **Malatya** (Beydağı) and **Şanlıurfa** Harran. The majority of individuals under temporary protection live outside the camps.

⁴⁷ European Commission, Commission signs €400 million agreement with Türkiye to support its recovery after the 2023 earthquakes, 07.02.2024, available [here](#)⁴⁸ PMM, *Irregular migration statistics*, available [here](#)

⁴⁸ PMM, *Irregular migration statistics*, available [here](#)

Introduction to the asylum context in Türkiye

Türkiye currently hosts a population of around 2,901,478 million refugees from neighbouring **Syria**⁴⁹ and 258,416 international protection applicants and status holders, most principally originating from **Afghanistan, Iran, Iraq**, and among others⁵⁰. These two populations of protection seekers are subject to two different sets of asylum rules and procedures. As such, the Turkish asylum system has a dual structure.

Türkiye maintains a geographical limitation to the 1951 Refugee Convention and only applies it to refugees originating from European countries. That said, in April 2013 Türkiye adopted a comprehensive, EU-inspired Law on Foreigners and International Protection (LFIP), which establishes a dedicated legal framework for asylum in Türkiye and affirms Türkiye's obligations towards all persons in need of international protection, regardless of country of origin. According to the UNHCR, the European *acquis* in the field of asylum and migration is clearly visible in Turkish asylum legislation thanks to this reform.⁵¹ The law also made the Directorate General of Migration Management (DGMM) the agency responsible for migration and asylum, which conducts the status determination procedure. Toward the end of 2018 DGMM took over all tasks relating to international protection, while UNHCR and its implementing partner, the Association for Social Development and Aid Mobilization (SGDD-ASAM), formerly known as Association for Solidarity with Asylum Seekers and Migrants— as it was called at that time, phased out of registration of international protection applicants. UNHCR maintains contact with the authorities and has a Host Country Agreement with Türkiye, which was signed in 2016 and entered into force on 1 July 2018.⁵² As of 29 October 2021, DGMM became the Presidency of Migration Management (PMM).⁵³

The LFIP provides three types of international protection status in accordance with Türkiye's "geographical limitation" policy on the 1951 Refugee Convention.

1. Persons who fall within the refugee definition of the 1951 Convention and come from a "European country of origin"⁵⁴ qualify for **refugee status** under LFIP, in full acknowledgment of Türkiye's obligations under the 1951 Convention.
2. Persons who fall within the refugee definition of the 1951 Convention but come from a so-called 'non-European country of origin' are instead offered **conditional refugee status** under LFIP. Conditional refugee status is a Turkish legal concept introduced by the LFIP for the purpose of differentiating in treatment between 1951 Convention-type refugees originating from 'non-European' states and those originating from 'European' states.
3. Persons who do not fulfil the eligibility criteria for either refugee status or conditional refugee status but would however be subjected to death penalty or torture in country of origin if returned, or would be at "individualised risk of indiscriminate violence" due to situations or war or internal armed conflict, qualify for **subsidiary protection** status under LFIP. The Turkish legal status of subsidiary protection mirrors the subsidiary protection definition provided by the EU Qualification Directive.

For refugees from Syria, Türkiye implements a temporary protection regime, which grants beneficiaries a right of legal stay as well as some level of access to basic rights and services. The temporary protection status is acquired on a *prima facie*, group basis, to Syrian nationals and stateless Palestinians originating from Syria. PMM is the responsible authority for the registration and status decisions within the scope of the temporary protection regime, which is based on Article 91 LFIP and the Temporary Protection Regulation (TPR) of 22 October 2014.

⁴⁹ PMM, Statistics, available [here](#).

⁵⁰ UNHCR Türkiye, 2024, available [here](#).

⁵¹ 11 Report, 'Long Road to Return II Durable Solutions for the Syrian Refugees in Türkiye,' December 2019, available [here](#) p. 13. The information was obtained through an interview with UNHCR that took place in September 2019.

⁵² UNHCR, 'Türkiye: Operational Update 2018 Highlights', available [here](#).

⁵³ Presidential Decree No 85 amending several presidential decrees, 29 October 2021, available in Turkish [here](#)

⁵⁴ For the purpose of "geographical limitation" with regards to the interpretation of the 1951 Convention, Government of Türkiye considers Council of Europe member states as 'European countries of origin'.

In line with the legislative framework, this report is divided into two sections, the first on international protection and the second on temporary protection.

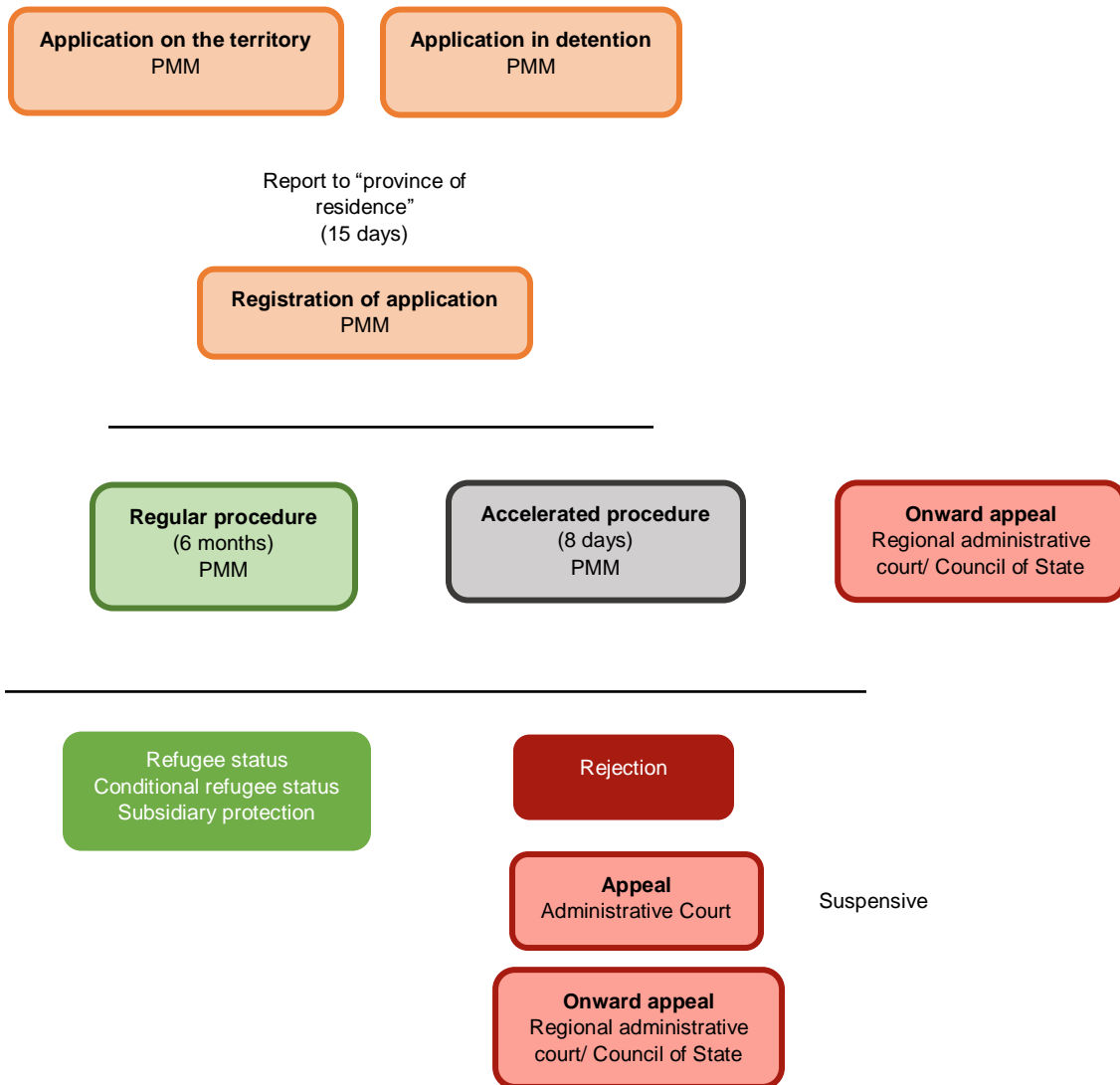


Asylum Procedure

Asylum Procedure

A. General

1. Flow chart



2. Types of procedures

Indicators: Types of Procedures

Which types of procedures exist in your country?

- | | | |
|--|---|--|
| ❖ Regular procedure: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ▪ Prioritised examination: ⁵⁵ | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ▪ Fast-track processing: ⁵⁶ | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Dublin procedure: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Admissibility procedure: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ❖ Border procedure: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Accelerated procedure: ⁵⁷ | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ❖ Other | | |

Are any of the procedures that are foreseen in the law, not being applied in practice? Yes No

3. List of authorities that intervene in each stage of the procedure

Stage of the procedure	Competent authority (EN)	Competent authority (TR)
Application	Presidency of Migration Management (PMM)	Göç İdaresi Başkanlığı (GİB)
Refugee status determination	Presidency of Migration Management (PMM)	Göç İdaresi Başkanlığı (GİB)
Appeal	International Protection Evaluation Commission Administrative Court	Uluslararası Koruma Değerlendirme Komisyonu İdare Mahkemesi
Onward appeal	Presidency of Migration Management (PMM)	Bölge İdare Mahkemesi/ Danıştay
Subsequent application	Presidency of Migration Management (PMM)	Göç İdaresi Başkanlığı (GİB)
(deemed) Withdrawal	International Protection Evaluation Commission Administrative Court	Uluslararası Koruma Değerlendirme Komisyonu İdare Mahkemesi

4. Number of staff and nature of the determining authority

Name in English	Number of staff	Ministry responsible	Is there any political interference possible by the responsible Minister with the decision making in individual cases by the determining authority?
Presidency of Migration Management (PMM)	14,052 ⁵⁸	Ministry of Interior	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

PMM is structured as a civilian agency. It has Provincial Departments for Migration Management (PDMM) across the 81 provinces of Türkiye. A Council of Ministers Decision issued in February 2018 established 36 District Directorates for Migration Management (*İlçe Göç İdaresi Müdürlüğü*) in 16 provinces, under the

⁵⁵ For applications likely to be well-founded or made by vulnerable applicants.

⁵⁶ Accelerating the processing of specific caseloads as part of the regular procedure.

⁵⁷ Labelled as “accelerated procedure” in national law.

⁵⁸ PMM, Göç İdaresi Başkanlığı Faaliyet Raporu 2024, available in Turkish [here](#).

responsibility of the respective PDMM.⁵⁹ The number of staffs working in provincial and district directorates is 14,052, and 999 staffs serve in the headquarters of PMM in Ankara.⁶⁰

UNHCR continues to assist PMM in building capacity in refugee law and provided training to staff. Similarly, the European Union Agency for Asylum (EUAA) provides support to PMM and PDMMs. EUAA implemented its fourth roadmap for cooperation 2022-2023 in January 2022, which ‘facilitates exchanges of best practices on asylum related- legislation, effective asylum procedures and reception system.’⁶¹ In addition, ICMPD, IOM and the Council of Europe have been carrying out a technical cooperation project with PMM as of 2023⁶². According to the Annual Report, within the scope of projects financially supported and completed by international institutions and organisations, 4 projects including CONTRIBUTE, RECORD, MAGNET, Supporting Provincial Migration Administration Directorates – Phase VI have been completed in 2024.⁶³ PMM publishes the both ongoing and completed projects regularly.⁶⁴

Similar to 2023, in 2024, PMM published its performance programme and annual report based on the 2019-2023 Strategy Plan, providing for the details regarding its human resources, organisational structure, resources and performance indicators.⁶⁵

Stakeholders mentioned that due to turnover among the staff especially in PDMMs, creating and maintaining sustainable dialogues with migration authority is sometimes challenging.⁶⁶

5. Short overview of the asylum procedure

To register an international protection application, potential applicants must approach a PDMM to register their application. If the PDMM cannot register the application itself, it instructs the applicant to report to a different province within 15 days, where he or she is required to reside and to register the application. Transportation costs are not covered but PMM refers people in need to NGOs for assistance. Practice is not standardised, and persons are often refused registration by the PDMM without being referred to another PDMM.

When they are referred to another provinces, the potential applicants are not given any proof of their intention to apply for asylum, which may be an issue if they are controlled by police on their way to referred province, as they could be treated as irregular migrants⁶⁷ and transferred to removal centre as they are.

An international protection applicant has the right to remain on the territory throughout the asylum procedure, although derogations apply on grounds of “public safety”, “public health” and “membership of a terrorist or criminal organisation”. The Constitutional Court issued a pilot judgment in the case of *Y.T.* in 2018, launching the pilot procedure to examine whether requests for interim measures it had received stemmed from a structural problem to protection from *refoulement* and, if so, what measures could be taken. In its decision, published in July 2019⁶⁸ the Court stated that the application of Articles 53(3) and 54 of LFIP should be revised and that appeals against deportation should have suspensive effect especially where deportation could create severe human rights violations. The Court gave the governmental authorities one year to make the necessary legal changes or it would examine all applications filed requesting an interim measure to stop deportations in substance. The authorities adopted the legal amendment in December 2019.⁶⁹ If the authorities respect the ruling and appeals now often have a

⁵⁹ Council of Ministers Decision 2018/11464 of 19 February 2018. See also Anadolu, ‘36 ilçeye İlçe Göç İdaresi Müdürlüğü kurulacak’, 29 March 2018, available in Turkish [here](#).

⁶⁰ PMM, Göç İdaresi Başkanlığı Faaliyet Raporu 2024, available [here](#).

⁶¹ EUAA & PMM, ‘Roadmap for Cooperation between the EUAA–PMM (2022-2023), 2022, available [here](#).

⁶² PMM, ‘Göç İdaresi Genel Müdürlüğünün Devam Eden Projeleri, last accessed 20 May 2024, available in Turkish [here](#) and [here](#).

⁶³ PMM, Göç İdaresi Başkanlığı Faaliyet Raporu 2024, p.47, available [here](#).

⁶⁴ PMM, Göç Projeleri, available [here](#); PMM, Göç İdaresi Başkanlığı Faaliyet Raporu 2024, p.47, available [here](#).

⁶⁵ PMM, Göç İdaresi Başkanlığı 2024 Performans Programı, 2024, available in Turkish [here](#).

⁶⁶ Information provided by stakeholders, March – April 2024.

⁶⁷ Information provided by stakeholders, March – April 2024.

⁶⁸ Constitutional Court, Decision 2016/22418, 30 May 2019, in Turkish [here](#).

⁶⁹ Articles 53(3) and 54 of LFIP that were amended by Law No 7196 amending several acts, 6 December 2019, available in Turkish [here](#)

suspensive effect meaning that rights to prevent refoulement have been strengthened, there have been concerns that this had a knock-on effect of increasing 'voluntary returns' (see section on

Removal and refoulement). Stakeholders noted more cases where the Court did not give an injunction, but the ECtHR did. The Court reportedly gives more importance to concrete documents that prove that the applicant is in danger with the applicant's story considered less as evidence.⁷⁰ In the absence of concrete evidence, the Court almost always decides to reject objections to deportation decisions.

Under the LFIP, the PDMM shall aim to issue a first instance decision within 6 months in the regular procedure. This time limit is not binding and may be extended if deemed necessary. In practice, the procedure might take years⁷¹. Under the accelerated procedure, the personal interview has to be conducted within 3 days of the date of application and a decision must be issued within 5 days of the interview, thus reaching 8 days in total.

The LFIP also provides a differentiated set of remedies against decisions issued under the regular procedure compared to the accelerated procedure and admissibility decisions. Judicial appeals against negative decisions under the accelerated procedure and inadmissibility decisions have to be filed within 7 days. The reduction of the time limit for objecting to deportation decisions from 15 days to 7 days has sparked concerns regarding its constitutionality. Many argue that this shortened period does not afford enough time for individuals in deportation centres to understand their right to appeal or to access legal counsel. Various challenges, such as difficulties in locating individuals, or accessing to removal centres, further compound the issue, often making it logistically impossible to meet the seven-day deadline. Consequently, there are very few cases where appeals are lodged. Despite these concerns, the Constitutional Court has ruled that the continuation of the seven days is not unconstitutional.

Negative decisions in the regular procedure can be challenged at the International Protection Evaluation Commission (IPEC) within 10 days or directly at the competent Administrative Court within 30 days; in practice, the latter remedy is applied. All international protection appeals generally carry suspensive effect and guarantee applicants' right to stay in Türkiye until the full exhaustion of remedies, except for persons facing deportation on grounds of "public safety", "public health" and "membership of a terrorist or criminal organisation".

B. Access to the procedure and registration

1. Access to the territory and push backs

Indicators: Access to the Territory

1. Are there any reports (NGO reports, media, testimonies, etc.) of people refused entry at the border and returned without examination of their protection needs? Yes No
2. Is there a border monitoring system in place? Yes No
 - ❖ If so, who is responsible for border monitoring? National authorities NGOs Other
 - ❖ If so, how often is border monitoring carried out? Frequently Rarely Never

1.1. Access at the land border

Irregular arrivals are often reported in **Van, Ağrı, Hakkari**, and **Erzurum** in the east, and **Muğla, Aydın, İzmir, Çanakkale, Edirne**, and **İstanbul** in the west.

According to PMM statistics, the number of irregular migrants decreased in 2024, from 254,008 to 225,831, one of the main reasons mentioned by authorities is increased border controls. The percentage of Afghans among those considered as irregular migrants increased from 27% to 29% in 2024, and Afghanistan remains the top nationality of persons apprehended for irregular migration in 2024 with 65,815 Afghan nationals, and until 8 May 2025, with 16,268 Afghan nationals. As in the previous year, in 2024, Syrians are the second highest nationality among those registered as irregular migrants (50,641). The other main nationalities are Egypt, Palestinian, Turkmenistan, Morocco, Uzbekistan, Iraq and Iran. This represents a

⁷⁰ Information provided by a stakeholder, May 2022.

⁷¹ Information provided by stakeholders, March – April 2024.

slight decrease in the total number of irregular migrants apprehended from 2023, it is still far from 2019 (454,662) which had seen the highest number since records began.⁷² According to the statement of Interior Minister, 202,705 irregular migrants were prevented from entering the borders, between 4 June 2023 and 5 August 2024.⁷³

There has been some dialogue or cooperation in certain areas with Frontex,⁷⁴ such as risk management, training, capacity building on fundamental rights, monitoring, SAR, and exchange of experience and knowledge.⁷⁵

In 2024, applying for international protection remained problematic for irregular migrants who faced pushback. Another worrying trend is increased number of crossing attempt of migrants who have status in Türkiye.⁷⁶ Registered migrants attempting to cross lose their rights in Türkiye due to the inactivation of their IDs.

Eastern Borders:

Türkiye constructed a wall on its Iranian border in 2018-2019.⁷⁷ The wall includes trenches and fences, with an increasing number of watchtowers and surveillance technologies such as unmanned aerial vehicles. In 2023, a wall of 1160 kilometres, corresponding to 80 percent of the borders of Iran and Syria, and a 1234-kilometer patrol road have been completed, and the work on the remaining 20 percent continues. 341 electro-optic towers, 250 of which are on eastern borders were established, serving with high technological capacity along the borders, which allows monitoring 740 km of the Eastern border. In addition, 284 thermal cameras, 151 elevator towers, 139 armoured surveillance vehicles, and seismic sensor systems were used in the borders.⁷⁸ Based on the profiles of groups arriving in Türkiye, it is estimated that most of these interceptions are from the Iranian border and the interceptions on the Syrian border continue to be small numbers as per the apprehension numbers published by the Turkish authorities.⁷⁹ There is no official information about how many migrants are affected regarding their nationality and which border.

In a statement delivered in December 2024, Interior Minister Ali Yerlikaya reported that a 78-kilometer segment of the Iranian border remains unsecured, with plans to complete securing the border by the end of 2025 through an investment of 10 billion Turkish liras. He noted that there are currently no remaining gaps along the borders with Syria or Iraq. According to the same statement, 230,438 individuals were prevented from irregular border crossings during the current cabinet's term, while, 212,910 persons were deported in the same period. The Minister also reported that 131,000 deportations were carried out in 2023, with a target exceeding, 140,000 set for 2024.⁸⁰

The presence of the wall has led to crossings shifting to more dangerous, rugged, and mountainous routes or taking place during winter months when the snow level is elevated. This situation increases the risk to people's lives by forcing them to cross more hazardous routes. As a result, migrants and smugglers favour steep and risky paths with no gendarmerie or police oversight⁸¹.

Increasing numbers of arrivals through the Iranian border have led to restrictive measures and arbitrary detention and deportation practices (see [Place of Detention](#)), with mainly single Afghan men being issued

⁷² PMM, *Irregular migration statistics*, available [here](#).

⁷³ Habertürk TV- İçişleri Bakanı Ali Yerlikaya Habertürk'te soruları yanıtlıyor, 9 August 2024, available [here](#).

⁷⁴ Yıldız, A., & Turhan, E. (2022). Entegre sınır yönetimi ve Frontex ile ilişkiler bağlamında Türkiye'nin farklılaştırılmış entegrasyonu. AB ile harici İstanbul Ticaret Üniversitesi Sosyal Bilimler Dergisi Türkiye'nin Göç Siyaseti Özel Sayısı, 21 (Özel Sayı), 211-231. doi: 10.46928/iticusbe.1110418

⁷⁵ Information provided by a stakeholder, March 2024.

⁷⁶ Information provided by a stakeholder, April 2025.

⁷⁷ TRT, 'Wall set to improve security along Türkiye-Iranian border', 8 November 2018, available [here](#)

⁷⁸ PMM, December 2023, İçişleri Bakanı Ali Yerlikaya: "Düzensiz Göçmenlere ve Göçmen Kaçakçılığı Organizatörlerine Asla Geçit Vermiyoruz", available [here](#).

⁷⁹ Information provided by stakeholder, March – April 2024

⁸⁰ Gazete Duvar, Yerlikaya açıkladı: Türkiye'de 2 milyon 938 bin Suriyeli mülteci var, 04.12.2024, available [here](#)

⁸¹ Information provided by stakeholder, March – April 2024.

deportation (“T1”) forms,⁸² or being pushed back without being provided any official form.⁸³ The “T1” forms are usually issued following administrative detention in a Removal Centre or at a police station, and are stored in the PMM electronic file management system named “Göç-Net”. If a “T1” deportation decision has been issued, the officials would unlikely agree to put into process the person’s international application and the deportation decision can only be challenged by a judicial appeal.⁸⁴ It was claimed that some people who left Van and Ağrı Removal Centres with T1 forms were sent across the border in 2023; however, it was claimed that this practice was temporary.⁸⁵

In 2024, individuals pushed back into Iran continued to face the risk of being left stranded in the mountainous terrain between Iran and Türkiye. As in 2023, there were reported incidents of non-state armed groups operating on the Iranian side who captured migrants, subjected them to beatings and torture, and demanded ransom payments from their families. Migrants also reported mistreatment by Iranian state authorities, including being shot at and injured. There is also news that may be related to the chain refoulement of these individuals.⁸⁶

Afghan nationals, in particular, were reported to face significant discrimination upon return to Iran, according to several stakeholders. Due to the fear of such treatment, many Afghan migrants repeatedly attempt to cross back into Türkiye, despite the life-threatening risks involved. Smugglers reportedly accept a single payment for multiple crossing attempts, facilitating continued migration efforts. Upon arrival in Türkiye, many of these individuals attempt to reach western cities.⁸⁷

Some of people who cross the border, including families, women, and children, are sent to removal centres, and the majority are pushed back to Iran⁸⁸. In some cases, they may be held for 3-4 months before being subjected to pushback without being taken directly to removal centres. As in 2023, reports continued reports in 2024 indicating that Afghan migrants were being transferred from towns near the land border with Greece to areas along the Iranian border. According to the stakeholders, Afghan nationals who sought to register for international protection in western cities were, in some cases, informed that registration would only be possible if they consented to relocation to provinces adjacent to the Iranian border.⁸⁹ (See [access to registration](#)). There are no clear or individual assessments, including for UAMs, regarding who will be transferred to removal centres, and the migrants are often not informed about their rights. It is important to note that among the groups crossing the border, there were unaccompanied minors aged from 12 to 17. There were some incidents that the records show that migrants are released after being held in removal centres, but they might be pushed back to Iran. It is very hard to follow the location of people and almost impossible to have any proof of the pushback.⁹⁰

Another common pushback method occurs within cities. In Van, it is reported⁹¹ that undocumented Afghans caught in the city or while traveling to western parts are detained at police stations for up to a few days without official registration. They are then carried back to the Iranian border, despite this practice being illegal under domestic and international law. Such pushbacks, especially in Van, Iğdır, Erzurum, and Ağrı, create unofficial borders within cities guarded by checkpoints. In February 2024, an Afghan national who had lodged an application for international protection was reportedly apprehended and unlawfully returned to Iran, without the implementation of a formal deportation procedure. The individual was allegedly held detained after requesting a change in their registered province, and was held —alongside others—city.in unofficial detention facilities rather than formal removal centers. The group was subsequently transported

⁸² See e.g. Afghanistan Analysts Network, ‘Mass Deportations of Afghans from Türkiye: Thousands of migrants sent back in a deportation drive’, 21 June 2018, available [here](#).

⁸³ Information provided by stakeholder, March – April 2024; TBB, Hukuka Aykırı Gerçekleştirilen Sınır Dışı İşlemlerine İlişkin Rapor, June 2024

⁸⁴ Information provided by a stakeholder in April 2025.

⁸⁵ Information from a stakeholder, March 2024.

⁸⁶ AP, At least 1.2 million Afghans forced to return from Iran and Pakistan this year, says UN, 28.06.2025, available [here](#)

⁸⁷ Information provided by stakeholders, March and April, 2025.

⁸⁸ Information provided by a stakeholder, March 2024.

⁸⁹ Information provided by stakeholders, March 2025.

⁹⁰ Information provided by stakeholders, March 2024.

⁹¹ GAR Report No. 9, Actors and Mechanisms of (Non-)Reception of the Afghans in Turkey, October 2023, available [here](#).

to the border and compelled to cross into Iranian territory by armed Turkish officials. A formal complaint was filled regarding the incident; however, the relevant Governorship declined to grant authorization denied for an investigation.⁹²

While crossings have decreased during the summer months due to the wall and heightened border measures, migrants often travel through mountains and over high cliffs, particularly in the winter season or on foggy summer days. Due to harsh cold, blizzards, avalanches, frostbite, and accidents, each year people lose their lives during this dangerous journey, and many are injured by loss of limb due to hypothermia or frostbite⁹³. Usually, detection is made by drones, due to the high level of snow during winter times. In an incident that occurred in March 2023,⁹⁴ 17 irregular immigrants suffered frostbite and were hospitalised. During the 6 months of the winter period of 2023-2024, there have been 8 separate incident reports, including babies, children, and women due to weather conditions.⁹⁵ On 15 November 2024, the bodies of three individuals — a man, a woman, and a child — were found near the border, lacking any form of identification. They were believed to have died from hypothermia, and their bodies bore evidence of damage caused by wild animals. In early 2025, another individual suffering from hypothermia was rescued, in addition to two others who had been saved in previous incidents.⁹⁶ Stakeholders expressed concern that these cases represent only a small proportion of similar occurrences. According to their accounts, many such incidents remain unreported, as authorities often refrain from disclosing them unless prompted by interventions from civil society actors, including NGOs and bar associations.

With the completion of the wall of a height of 3.5 m on the southeastern border with Syria, monitored 24/7 by cameras and drones, irregular crossings are limited.⁹⁷ Crossings are only allowed for individuals who require specific medical treatments and their attendants, for the duration of the treatment period.⁹⁸

Access to the territory through the Syrian land border is discussed in detail in [Temporary Protection: Admission to Territory](#).

Western Borders:

At the beginning of 2023, Greece announced a further extension of its border fence with Türkiye to be extended by another 35 kilometers and ultimately wants the five-meter high steel fence on the Evros River (Meric) to cover most of the 192-kilometer border.⁹⁹ On the other side of the border, 91 electro-optic towers were established by Turkish authorities which allows monitoring 350 km of the western border. Edirne Governor reported irregular crossings through the land border between Greece and Türkiye have decreased by more than 95%, and Turkish authorities stopped 1,452 irregular migrants trying to cross.¹⁰⁰ Additionally, the Governor of Edirne announced plans to build 8.5 kilometers of border wall, which may eventually be extended along the entire border.¹⁰¹ Since the improvement of the relationship and cooperation between Greece and Türkiye, mobile immigration points have been located in Edirne, and police control at the entrances and exits of the city has increased. The crossing attempts in Edirne are lower than the attempts to cross the sea. Accordingly, the Governor of Edirne stated that 78% of apprehensions have been carried out before migrants reach the border zone.¹⁰²

⁹² Information provided by a stakeholder, March 2025

⁹³ Information from a stakeholder, March 2024.

⁹⁴ Van Barosu Faaliyet Raporu 2023, available [here](#).

⁹⁵ Van Barosu Göç ve İltica Komisyonu (@Vaniltica) / X (twitter.com) Van ili sınır bölgesinde yaşanan donma olayları ve hak ihlallerine ilişkin basın açıklaması. [here](#)

⁹⁶ Van Barosu Göç ve İltica Komisyonu (@Vaniltica) / X (twitter.com) available [here](#)

⁹⁷ Information provided by a stakeholder, March 2024.

⁹⁸ Ibid.

⁹⁹ Info Migrants, 23.01.2023, [Greece expands border fence with Turkey and urges EU support - InfoMigrants](#).

¹⁰⁰ Daily Sabah, 18.02.2024, [Türkiye's main land border sees drop in migrants heading to Europe | Daily Sabah](#).

¹⁰¹ Anka, Edirne Valisi Yunus Sezer: "Yunanistan sınırına 8,5 kilometre duvar yapılacak", 04.03.2025

¹⁰² T.C. Edirne Valiliği, 28.04.2024, Vali Sezer, "Yakalamaların yüzde 78'ini sınır hattına gelmeden gerçekleştiriyoruz"

In 2024, the Bulgarian-Turkish border recorded the highest reported number of pushbacks and incidents of violence against migrants among all European countries.¹⁰³ In 2024, the Bulgarian Ministry of Interior reported the prevention of 52,534 border crossings on the Bulgarian Turkish border.¹⁰⁴

As in previous years, the main route of crossing has been to Greek islands, there was also another route to Italy. There have been reports of pushback in Aegean from **Greece** to Türkiye for several years. 11,715 migrants were pushed back off the coast of western İzmir province, which has a meandering coast stretching over 460 kilometres and close to the Greek islands.¹⁰⁵ İzmir was followed by other western provinces, Muğla, Çanakkale, Aydın and Balıkesir.

45 people died while crossing from the Turkish coast in the Aegean Sea.¹⁰⁶ According to the Aegean Boat Report, in the Aegean Sea, 508 pushback incidents were recorded in 2024, involving 14,482 women, men, and children attempting to reach in Europe¹⁰⁷. While there was an increase in the number of deaths, a decrease in the number of pushback incidents was noted. Between August and October 2024, at least 167 migrants were rescued by Turkish Coast Guard units.¹⁰⁸ In the same year, UNHCR provided 267,713 core relief items to individuals who had been rescued, intercepted, or apprehended.¹⁰⁹ According to the announced figures, the number of irregular migration cases were 1,607 in 2022, 1,879 in 2023 and 2005 in 2024. The number of migrants who were rescued while attempting to cross and pushed back into Turkish territorial waters was 49,312 in 2022, 56,289 in 2023¹¹⁰ and 55,467 in 2024.¹¹¹ The trend regarding the multiple crossing attempts continued in 2024. The decrease in pushback incidents may be partly attributed to the improvement in relations between the two countries. The increase in the number of irregular migration cases, along with the decrease in apprehensions, may reflect the efforts of Turkish authorities to intercept individuals before they reach the coasts. Despite the declining number of migrants and cases, the rising death toll may be linked to the increasingly aggressive measures employed by Greek forces.¹¹²

According to Turkish Coast Guard,¹¹³ 484 organisers were apprehended in 2024.¹¹⁴ With the amendment made to Article 79, paragraph 1 of the Turkish Penal Code in 2023, the minimum penalty for the crime has been increased from 3 years to 5 years imprisonment. It is noted that while the minimum prison sentence has been increased, there has been no changes regarding the fines.

Compared the previous years, more families, with children were trying to cross via sea. It is worrying that the number of people who have been registered in Türkiye, and lived there for longer periods increased among the people who attempted to cross to Europe in 2024.¹¹⁵ This means that these people will lose their rights to access education, healthcare, employment and others, as a consequence more children will be out of school and an increasing number of people will find themselves in precarious situations in Türkiye. Predicted reasons can be listed as, earthquakes, deepening economic crisis with a high inflation rate, discourses used in the election campaign on “sending migrants back” increased anti-refugee sentiments, and problems on accessing housing.¹¹⁶ Concerns have been raised about the possible negative impact of the EU Pact on migration and asylum on asylum seekers attempting the crossing, as it is started to be

¹⁰³ Euronews, [EU borders recorded over 120,000 migrant pushbacks in 2024, says report by NGOs.](#)

¹⁰⁴ Pushed, Beaten, Left To Die European Pushback Report 2024, February 2025 available [here](#)

¹⁰⁵ Daily Sabah, 18.02.2024, [Türkiye's main land border sees drop in migrants heading to Europe | Daily Sabah](#)¹⁰⁶
Dipnot, [2024'te Düzensiz Göçle Mücadelede Öne Çıkan Veriler](#), 2 January 2025.¹⁰⁷ Annual report for 2023 from Aegean Boat Report, available [here](#).

¹⁰⁶ [Dipnot, 2024'te Düzensiz Göçle Mücadelede Öne Çıkan Veriler](#), 2 January 2025.¹⁰⁷ Annual report for 2023 from Aegean Boat Report, available [here](#).

¹⁰⁷ Annual report for 2023 from Aegean Boat Report, available [here](#).

¹⁰⁸ Daily Sabah, Turkish coast guard rescues 23 migrants pushed back by Greece, 05.08.2024, available [here](#); Daily Sabah, 116 migrants pushed into Turkish waters by Greece rescued, 20.08.2024, available [here](#); Daily Sabah, Turkish coast guard rescues 28 migrants after Greek pushback, 14.10.2024, available [here](#)

¹⁰⁹ UNHCR, UNHCR in the Aegean and Mediterranean Coastal Region Factsheet - UNHCR Türkiye January 2025, available [here](#)

¹¹⁰ IHA, 30.12.2023, 2023'te bin 879 düzensiz göç olayı yaşandı, available [here](#).

¹¹¹ Daily Sabah, Turkish coast guard catches over 55,000 irregular migrants in 2024, 02.01.2025, available [here](#)

¹¹² Info Migrants, [Greek coast guard denies allegations of illegal pushbacks](#), 23 July 2024.

¹¹³ Sahil Güvenlik Dergisi Ekim Sayısı, October 2023, available [here](#).

¹¹⁴ Dipnot, [2024'te Düzensiz Göçle Mücadelede Öne Çıkan Veriler](#), 2 January 2025.

¹¹⁵ Information provided by stakeholders, April 2025.

¹¹⁶ Information provided by stakeholders, March - April 2024.

heard that EU policies will be getting more restricted¹¹⁷. A report published by the Association for Solidarity with Refugees (Mülteci-Der), based on four focus group discussions conducted in 2024, identified key reasons for irregular migration, including obstacles in accessing legal documentation, healthcare services, and employment. Participants often chose this path due to a lack of stability, feeling invisible, and a sense of disappointment.¹¹⁸ The top nationalities among the migrants attempting to cross the Aegean are Afghans, Syrians, and Palestinians. In 2024, there were increases in the numbers of Congolese and Pakistani and Sudanese nationals.¹¹⁹ According to stakeholders, unlike in 2023, irregular border crossings in 2024 were observed throughout the entire year, rather than being limited to summer months.¹²⁰ After settling of the mobile migration points in the main crossing cities, the numbers decreased. For instance, in İzmir, mobile migration points were introduced in October 2023, and there is mobile migration vehicle moving through the main crossing points by the coast.¹²¹ According to stakeholders, in 2024, the primary reason for the apprehension of individuals—both with and without identification—was attempting to irregularly cross Türkiye’s western border. Stakeholders observed a distinction between those trying to reach Greece and those attempting to reach Bulgaria. While attempts to reach Greece typically ended in violent pushbacks by state authorities or Frontex forces, those heading toward Bulgaria—often through forested areas—were reportedly subjected to violence by state-supported civilians, including Afghan gangs. Individuals also reported being attacked by aggressive dogs, resulting in serious injuries. Following December 2024, the number of Syrians attempting to cross the western border irregularly decreased, reportedly due to news and widespread rumours that some EU Member States had suspended the processing of asylum claims from Syrians.¹²²

A 2024 study revealed that, in recent years, at least nine migrants were deliberately pushed into the sea by Greek forces. Some of them had already set foot on a Greek island.¹²³ Investigations have been initiated both within Greece and at the EU level¹²⁴. During a monitoring visit, the Human Rights and Equality Institution of Türkiye interviewed a survivor of a pushback incident, who described the following: the group set out to sea at night in a boat but was intercepted at the Greek border by individuals wearing ski masks. They were taken to a forested area, then forced onto a boat and transported to the middle of the sea. There, they were subjected to physical violence, and their cash, phones, identity documents, and other personal belongings — including, in some cases, their shoes — were confiscated. Some of these items were thrown into the sea. Finally, they were abandoned in a damaged inflatable boat and left to die.¹²⁵

The Facility for Refugees in Türkiye previously has funded a project under the first tranche for a total of EUR 80 million to strengthen the capacity of the Turkish Coast Guard to carry out search and rescue operations.¹²⁶

1.2. Access at the airport

Airports in İstanbul (Sabiha Gökçen and İstanbul) continue to serve as a key international hub for connection flights from refugee-producing regions to European and other Western destinations for asylum. The main airport is now the new İstanbul Airport. It should be noted that visa restrictions have applied to Syrian nationals arriving from third countries by air and sea since 2016. Türkiye’s open-door policy ended with the signature of the EU-Türkiye Statement in 2016 and since then very few applications have been accepted at the borders.

¹¹⁷ Information provided by stakeholders, March - April 2024.

¹¹⁸ Mülteci-Der, Belirsizlikle Başa Çıkmak: İzmir’deki Mültecilerin Karşılaştığı Zorluklar ve Deneyimler- Odak Grup Toplantılarından Elde Edilen Görüşler (Haziran-Kasım 2024), 24 January 2025, available [here](#).

¹¹⁹ Information provided by a stakeholder, March 2024 And May 2025

¹²⁰ Information provided by a stakeholder May 2025

¹²¹ Information provided by stakeholders, March – April 2024.

¹²² Information provided by multiple stakeholders, February, March and April 2025.

¹²³ BBC Türkçe, [Görgü tanıklarına göre, Yunan sahil güvenliği göçmenleri denize atarak ölümlerine neden oldu](#), 17 June 2024.

¹²⁴ Bianet, [Yunanistan’da ana muhalefet SYRIZA’dan mülteci ölümleriyle ilgili soruşturma talebi](#), 18 June 2024; Reuters, [EU border agency reviewing 12 cases of potential rights violations by Greece](#), 8 April 2024.

¹²⁵ TIHEK, Aydın Kuşadası Sahil Güvenlik Karakol Komutanlığı Göçmen Bekleme Alanı Ziyareti Raporu, 2024/56, available [here](#).

¹²⁶ EC, Seventh Annual Report of the Facility for Refugees in Turkey, COM (2023) 543 final, 22 September 2023, Brussels.

According to the legal framework, the conditions for foreigners who are not allowed to enter Türkiye should not be interpreted or applied in a way that prevents them from applying for international protection. However, it is very difficult to apply for international protection at airports, and individuals are often unable to submit their applications. Similarly, to previous years, in 2024 it continues to be difficult to apply for asylum at the airport. The conditions worsened in transit zones, especially at the İstanbul Airport. In airport transit zones, for example, it is legally impossible to file for the suspension of a deportation order, as the authorities do not issue such orders on the grounds that the individuals are not considered to be “inside” the country’s borders. The only available legal remedy is to request an interim measure to secure access to a lawyer — a request that the Constitutional Court has consistently denied since 2017.

The common practice appears to be either explicitly or implicitly rejecting applications by not processing them. Finding a contact person to apply for international protection and receiving a response is particularly challenging at the airport. Even if lawyers manage to submit a file, receiving a response is unlikely. This issue remains one of the blind spots. When it is not possible to reach immigration authorities, files are not processed, effectively blocking the right to petition. Once the individual informs lawyers, NGOs, or UNHCR, these actors notify officials outside the airport and wait for them to contact the authorities inside the airport. In almost every case, the standard response is that the individual cannot be located in the transit zone and is expected to present themselves at the Provincial Directorate of Migration Management (PDMM) desk within the airport. However, when the individual attempts to do so, the same cycle tends to repeat. Despite this consistent pattern, stakeholders reported two exceptional cases in 2024 in which individuals were able to submit international protection applications and were admitted to Türkiye: one Palestinian at İstanbul Airport and one Chinese national at Sabiha Gökçen Airport.¹²⁷

Stakeholders also reported that in 2024, at İstanbul Airport, many Sudanese applicants were denied the opportunity to submit their petitions for international protection. These individuals were not allowed to officially lodge their claims. Applicants often try to endure the harsh conditions of the transit zones, but eventually give up and depart for another country in hopes of seeking protection elsewhere.¹²⁸

In one case, the person stayed in the transit area for 7-8 months, an international protection application was received but ultimately rejected. The meetings with lawyers take place in a publicly accessible space, without any attorney-client privacy.¹²⁹ According to stakeholders, in 2024, in the transit zone, even being officially rejected and waiting for a court decision — with the reassurance that a legal procedure had at least been initiated — became challenging.¹³⁰

The Constitutional Court of Türkiye unanimously rejected the claim of a Cameroonian applicant, who was held in the inadmissible passenger waiting area at İstanbul Airport for about seven months after attempting to enter the country with a fake passport, that his right to liberty and security under Article 19 of the Constitution was violated. The rejection was based on the grounds that legal remedies had not been exhausted. The decision, published in the Official Gazette on 1 February 2023,¹³¹ highlights that such detentions in airport transit zones are not considered administrative detention by authorities, as the foreigner can theoretically return to their home or a third country at any time. Consequently, no administrative detention orders are issued, and applications to review the legality of such detentions are often dismissed by judges for this reason.

The airline company which brought the protection seeker to the country covers the food and beverage expenses of that person and meets some basic needs. One stakeholder described the conditions saying people were kept in a place with no windows, no ventilation, with the lights were on 24 hours for nine months, and only cold airline sandwiches given to eat.¹³²

After the application is submitted to PMM, the procedure is managed by the PDMM. According to law, they have to be accepted into the country once the application is received. In İstanbul Airport, people who have applied for international protection can stay for months in rooms provided at the airport. Those whose

¹²⁷ Information provided by a stakeholder, March 2025.

¹²⁸ Ibid.

¹²⁹ Information provided by a stakeholder, March 2024.

¹³⁰ Information provided by a stakeholder, March 2025.

¹³¹ [T.C. Resmi Gazete, 01.02.2023](#), 1 February 2023.

¹³² Information provided by a stakeholder, May 2023.

applications are rejected file a lawsuit against the refusal decision before the administrative court and should remain in the room until the case is concluded. This makes it almost impossible to apply. According to law, an international protection application cannot be made through a proxy. This application cannot be made at the airport due to the physical limitations of that area as it is very difficult to access. If the applicant needs to apply to the court after receiving a decision, a lawyer can meet with that person at the border at the airport.

In 2024, stakeholders confirmed that it has been still difficult to obtain permission from the airport administration for a private interview with clients. Even when a lawyer manages to meet the client, it is almost impossible to submit an international protection application at the airport.¹³³ Accessibility to transit zones at **Istanbul** airport remains a problem. Even if the person contacts an NGO or a lawyer, the transit zone administrator does not frequently inform lawyers and NGOs accurately.¹³⁴ Lawyers are not permitted to enter the transit zone to meet with migrants unless their potential clients have already received a formal decision — whether positive or negative. Otherwise, access is denied on the grounds that "there is no evidence that the mentioned person is in the airport." Even in some cases lawyers have been advised to purchase a flight ticket to gain access to the area. There is a glass in the middle of the meeting place, where passport control occurs, and lawyers can only meet with their clients while standing in a publicly accessible space, without any attorney-client privacy. Although meeting places were planned, the meetings have been made difficult for security reasons.¹³⁵

If the person arrives with a fake passport, they are taken to a room called 'problematic passengers' room. Communication with PDMMs about asylum requests is not quick. This systemic issue can lead to the extended stay of such persons in the transit zone or problematic passenger room.¹³⁶

The report prepared by the Turkish Human Rights and Equality Institution (TİHEK)¹³⁷ in 2024 based on their unannounced visits to the Istanbul Sabiha Gökçen Airport, Muğla Dalaman and Milas Airports and Antalya Airport Transit Center, indicates overall positive improvements in the conditions at the center in the transit area. Passengers who are denied entry to Türkiye for reasons such as lack of valid travel documents, entry bans, or expired passports are directed to the Airport Working Group Directorate. Here, they are informed of the reasons for their denial and their legal rights and obligations, fingerprinted, and have their identity, country of origin, and airline recorded. Denied passengers undergo searches, with their belongings documented and stored securely. Searches are conducted by security personnel of the same gender. Accordingly, international protection applications are rarely submitted at Sabiha Gökçen Airport. Whereas, at Antalya Airport's Transit Area, the institution conducted interviews with the international protection applicants and examined their files. While the applicants' countries of origin are generally unknown, one case involved an Afghan national whose international protection application was rejected; this individual remained in the transit area for eight months, pending the conclusion of his judicial process. At Dalaman and Milas airports, no international protection applications were reported.

In 2024, while notary services at the nearest Removal Center (Arnavutköy) reportedly cost around 2,500 TRY, this process proved far more complicated at Istanbul Airport. A lawyer attempting to bring a notary to the airport faced repeated refusals from approximately ten notary offices. Eventually, an agreement was reached with a notary based in Kartal, on the opposite side of the city, but the visit never took place. Unlike in the past, the governor's office at the airport now requires the original professional ID cards of the notary, their clerk, and the interpreter in advance, as part of the application process. If the request is approved, the notarial act may take place on another day. In practice, this means a lawyer must collect and hold these ID cards for several hours ahead of the appointment—an arrangement that stakeholders view as unrealistic and incompatible with the normal course of professional life.¹³⁸

¹³³ Information from a stakeholder, May 2023.

¹³⁴ Information provided by a stakeholder, April 2023.

¹³⁵ Information provided by a stakeholder, March 2024.

¹³⁶ Information from a stakeholder, May 2023.

¹³⁷ Turkish Human Rights and Equality Institution Reports, 202t, Sabiha Gökçen available [here](#), Antalya [here](#), Dalaman [here](#), Milas [here](#)

¹³⁸ Information provided by a stakeholder, May 2025.

2. Removal and *refoulement*

2.1. The derogation from the *non-refoulement* principle

Applicants for international protection generally have the right to remain on the territory of Türkiye throughout the procedure.¹³⁹ However, an exception to this rule was introduced by way of emergency decree in October 2016, providing that a deportation decision “may be taken at any time during the international protection proceedings” against an applicant for reasons of: (i) leadership, membership or support of a terrorist organisation or a benefit-oriented criminal group; (ii) threat to public order or public health; or (iii) relation to terrorist organisations defined by international institutions and organisations.¹⁴⁰ Law No 7070 on 1 February 2018 consolidated the reform.

For foreigners who have been convicted of an offence, the Public Prosecutor shall request the opinion of the Ministry of Interior as to whether they should be removed from the country.¹⁴¹

The law effectively enables the deportation of asylum seekers, beneficiaries of international protection and beneficiaries of temporary protection (see [Temporary Protection: Protection from *Refoulement*](#)) on the aforementioned grounds which remain largely vague and could be interpreted widely. The reform introduced by the Decree has been criticised for facilitating and exacerbating risks of arbitrary deportations jeopardising the life and safety of refugees.¹⁴²

Amendments to the LFIP in 2019 allow for the travel costs for removal to be borne by the deportee. If the individual does not have sufficient means, the expense shall be borne by PMM yet in the same article it states “money belonging to the foreigner, apart from the amount that is required to meet the basic needs identified by the Directorate General, will be recorded as income to the Treasury”.¹⁴³ There is no information yet about how this has been applied in practice.

A new regulation on Penal Execution Institutions and Execution of Penalties and Security Measures was enacted on 29 March 2020. According to Article 52 the following principles apply to convicts to be deported:

(1)

a) The decree on expulsion is sent to the Office of the Chief Public Prosecutor where it is recorded in the execution book and sent to the highest security authority and immigration administration units.

b) Before being released from the institution, the administration of the institution informs the highest security authority of that place and the units of immigration administration on the release date of the convict. On the date of release, the convict is delivered to law enforcement for deportation proceedings.

c) The deportation of convicts not housed in institutions are carried out by immigration administration units.

(2) Assessments regarding deportation procedures for convicts are made by the Ministry of Interior.

The country of deportation is not specified in deportation orders, which makes it questionable as to how assessment of the risk of *refoulement* is carried out as this assessment inherently requires an assessment of conditions in the country of deportation. This administrative deficiency is addressed in different ways by the courts. The general tendency is to assume that the country of removal is the country of origin and assess risk of *refoulement* based on this assumption. However, there are some positive decisions problematise the non-specification of country of removal. In 2024, the Şanlıurfa Administrative Court found a deportation decision of a Syrian national unlawful because the deportation order did not clearly specify the country to which the foreign national would be deported. According to the Court, the absence of the

¹³⁹ Article 80(1)(e) LFIP.

¹⁴⁰ Article 54(2) LFIP, as amended by Article 36 Emergency Decree 676 of 29 October 2016. The provision cites Article 54(1)(b), (d) and (k) LFIP, the latter inserted by Emergency Decree 676.

¹⁴¹ Article 77 Regulation No 28578 on Conditions of Probation, 5 March 2013, as amended by Article 1 Regulation No 30631 of 20 December 2018.

¹⁴² Information provided by a stakeholder, May 2023.

¹⁴³ Article 60/3 (l) LFIP.

Third Country Assessment Form for Nationals of Vulnerable Countries, which is required to be issued by the governorate, renders the deportation decision unlawful and contrary to the case law of the Constitutional Court. In line with this, the Court has outlined five key principles that must be followed in such assessments. First, the deportation order must clearly indicate the country to which the individual will be removed. Second, it must be determined whether the person wishes to return to their country of origin. Third, the safety of the designated third country must be investigated, and the deportation order must include concrete assessments explaining why it is considered safe for the individual. Fourth, the individual must be informed about the safety of the third country and their opinion must be obtained. Finally, the deportation and third country assessment must be conducted by the governorate.¹⁴⁴ However, in another case where the form was issued for a Syrian national and Germany was designated as a safe third country, the Istanbul 18th Administrative Court did not consider this determination unlawful and dismissed the case filed against the deportation order. The Court failed to question the feasibility of carrying out the deportation of a Syrian national to Germany.¹⁴⁵

There are also instances where the absence of a specified country of removal is used as an excuse to avoid conducting a risk assessment, assuming that the removal will adhere to the principle of non-refoulement. Administrative practice of non-specification of country of removal and its judicial oversight renders an effective risk assessment difficult.¹⁴⁶

According to the Union of Turkish Bar Association's report published in June 2024,¹⁴⁷ there have been numerous complaints that migrants are being deported despite the administrative appeal period not having expired, or even after having filed a lawsuit against the deportation orders in accordance with Article 53/3 of the LFIP. An extensive survey among 47 bar associations revealed that these unlawful deportations are not isolated incidents but systematic administrative practices. A total of 491 lawyers reported that at least one of their clients was either deported before they could file an appeal within the seven-day time limit, or deported between 11 August and 11 October 2023 despite having a pending case against the deportation order. The first category involved at least 1,772 individuals, while the second affected at least 696 individuals. Furthermore, cases were documented where deportations occurred even after the Constitutional Court issued stay orders. Over half of those deported in such a manner were Syrian nationals, with others from Afghanistan, Iran, Iraq, and other countries. Lawyers have taken multiple legal actions, including filing complaints with the Prosecutor's Office. Additionally, it was reported that different deportation methods are used, with particular concern for Afghans being pushed back at the Iranian border into dangerous situations involving criminal gangs. Ankara Bar Association published a statement to draw attention to unlawful deportations despite the fact that a lawsuit was filed for the annulment of the deportation decision and the relevant authority was notified.¹⁴⁸ According to LFIP, if a lawsuit is filed against the deportation decision, people cannot be deported until the final decision has been taken by the court.

In 2024, two stakeholders — based in Van and Hatay respectively — reported incidents involving the immediate and unnotified deportation of individuals, falsely framed as transfers to Removal Centers (RCs). In Van, a stakeholder described a case in which a client, initially told he would be transferred to Kurubaş RC, was instead forcibly deported without notice. Despite multiple inquiries, the individual's whereabouts remained unclear until he later reported being part of a group forcibly pushed back across the Iranian border, where he was also subjected to physical violence. When the stakeholder lodged a complaint with the public prosecutor's office, the response reportedly reflected a broader sentiment of deterrence, suggesting a lack of institutional will to provide protection.

In Hatay, a Syrian national was similarly apprehended and represented by a lawyer who was told the individual would be transferred to an RC. However, the person was reportedly deported to Syria within half an hour of arrival at the center, without prior notification to legal counsel or the family. These cases raise

¹⁴⁴ T.C. Şanlıurfa 1. İdare Mahkemesi 2024/311 E., 2024/1773 K., T: 30.09.2024.

¹⁴⁵ T.C. İstanbul 18. İdare Mahkemesi 2024/3898 E., 2025/1922 K., T: 30.04.2025.

¹⁴⁶ For further analysis, see; Gamze Ovacık, *Turkish Judicial Practices on International Protection, Removal and Administrative Detention in Connection with the Safe Third Country Concept* (On İki Levha Publications 2021) 168-177.

¹⁴⁷ TBB, Hukuka Aykırı Gerçekleştirilen Sınır Dışı İşlemlerine İlişkin Rapor, Haziran 2024. [here](#)

¹⁴⁸ Barosu, "Hukuka Aykırı Sınır Dışı Etme İşlemleri Durdurulmalıdır!", 27.10.2023, available [here](#).

serious concerns regarding due process, transparency, and access to legal safeguards in deportation procedures.¹⁴⁹

PDMM has been using a form for the evaluation of a safe deportation country where Syrians could be deported. On this form, four countries are determined as safe countries for Syrians: **Iran, Sudan, Haiti, and Micronesia**. Refugees signed the form, but there was no information on Syrians being deported to Iran or another country based on this document.¹⁵⁰ As of the end of 2021 this form was still valid, but the country names had been changed; for example, **Russia** was included.¹⁵¹ Another stakeholder mentioned that these countries are Dominican Republic, Malaysia, Sudan, and Ecuador in 2023.¹⁵² According to stakeholders, no individual was deported to one of these countries. In 2024, in the case of a Syrian national, the Bursa 1st Administrative Court ruled that designating Ecuador as a safe third country for the applicant was not unlawful and rejected the case filed against the deportation order.¹⁵³ However, this practice might result in the cancellation of international protection and prevents individuals from re-applying for international protection.¹⁵⁴ In the case of an Afghan from the Hazara region, the 1st Administrative Court of Izmir discussed whether the deportation decision was suitable for his family and if the country of deportation was to be considered safe for him.¹⁵⁵

Security codes

Deportation on public order, public security and public health grounds is linked to the security restriction codes issued by PMM, a practice still not governed by clear and publicly available criteria.¹⁵⁶ The implementation and regulation of these codes is not set out in the law but likely in internal circulars and instructions within the administration.

Security-related codes such as “G-89” for foreign terrorist fighters and “G-87” for general security seem to still be applied, though mainly in specific parts of the country, such as **Istanbul**.¹⁵⁷ The assessment of risks, conducted by the Risk Analysis Department as far as airports are concerned,¹⁵⁸ is made with reference to broad criteria and in practice may be based on the appearance or point of entry of the individual e.g. Turkish-Syrian border.¹⁵⁹ Intelligence from other countries often leads to the issuance of a security restriction code, even though the content and quality of intelligence vary depending on the issuing country.¹⁶⁰

Security codes can be only appealed before the 1st Administrative Court of **Ankara**, since they are issued by PMM Headquarters. In appeals against the issuance of security codes, confidential documents submitted by PMM are not available to the individual or their lawyer; they can only be accessed in person at the registry of the Administrative Court of Ankara.¹⁶¹ The court generally leaves a wide margin of discretion to PMM regarding the issuance of codes. A couple of years ago, it appeared as if it has not taken a uniform approach to the scrutiny of codes, with some rulings annulling the issuance of codes for lack of evidence and others upholding them.¹⁶² In Gaziantep, two rulings annulling the issuance of codes were recorded in 2022.¹⁶³ In one case, a Syrian resident challenged the G-87 code, deportation, and detention orders issued by the PMM in 2017. He won initially but lost at the regional court. His deportation was halted in 2018, and he regained his residence permit. In January 2022, the PMM reissued the orders, but he won his cases as the PMM provided no specific evidence for the G-87 code. He received a humanitarian visa

¹⁴⁹ Information provided by multiple stakeholders, March and April 2025

¹⁵⁰ Information provided by a stakeholder, March 2021 and March 2024.

¹⁵¹ Information from a stakeholder, May 2022.

¹⁵² Information provided by a stakeholder, March 2024.

¹⁵³ T.C. Bursa 1. İdare Mahkemesi, 2024/17 E., 2024/654 K., 28.05.2024 T.

¹⁵⁴ Information from a stakeholder, May 2023.

¹⁵⁵ Information from a stakeholder, May 2023.

¹⁵⁶ Information provided by multiple stakeholders, May 2023.

¹⁵⁷ Information provided by a stakeholder, May 2022 and March 2024.

¹⁵⁸ Karar, 'Risk analiz merkezi kapılarını KARAR'a açtı', 28 April 2016, available in Turkish [here](#).

¹⁵⁹ Information provided by a stakeholder, May 2023.

¹⁶⁰ Information provided by a stakeholder, May 2023.

¹⁶¹ Information provided by a stakeholder, May 2023.

¹⁶² For examples of decisions cancelling a “G87” code due to lack of evidence, see 1st Administrative Court of Ankara, Decision 2018/2207, 13 February 2019; Decision 2018/524, 14 March 2018.

¹⁶³ Information provided by a stakeholder, May 2023.

instead of a residence permit. In another case, a G-82 code was issued to an INGO employee due to alleged terrorist links of her employer. She was detained for a year, her deportation was suspended in 2021, but the administrative court upheld the deportation in 2022. She reapplied for temporary protection, with 15-20 others in similar situations in Gaziantep.¹⁶⁴ According to stakeholders, it has become nearly impossible to cancel a security code. In 2024, the Ankara 1st Administrative Court rejected a case challenging the G-43 security code issued against a Syrian national, despite the fact that the criminal investigation had concluded with a decision of non-prosecution.¹⁶⁵ The Court of Appeal also dismissed the applicant's appeal, stating that the issuance of such security codes falls within the State's sovereign powers.

¹⁶⁶

In 2024, an Iraqi national challenged his deportation order, which was based on a G-87 security code, arguing that he should be protected under the principle of non-refoulement. He claimed that his previous service in Saddam's Guards battalion, his prolonged imprisonment in Iraq, and the risk he faced from Shia groups placed him in danger upon return. Despite the fact that the public prosecutor had issued a decision of non-prosecution, the Afyonkarahisar 1st Administrative Court held that administrative courts have a broader margin of appreciation and rejected the appeal against the deportation order.¹⁶⁷ In another case, the same court rejected an appeal against the deportation order of an Iraqi woman whose husband was subject to a G-87 security code. Although the husband had received a decision of non-prosecution, the woman was also issued a G-87 code and deportation order solely on the basis of being his spouse. In its reasoning, the court stated that terrorist organizations specifically exploit women who do not have any criminal record, and in cases where the husband cannot be deported, there is a risk that such organizations may approach and provoke the spouse, potentially using her in activities against the State¹⁶⁸. An Afghan applicant's international protection application was rejected due to the presence of a G-87 security code. When he challenged the decision on the grounds that he had not been provided with an interview form, the İzmir 1st Administrative Court dismissed the case, reasoning that the applicant was using the international protection procedure as a means to an end rather than genuinely seeking protection¹⁶⁹. Although the previous cases raise concerns regarding the disregard of the presumption of innocence, the Şanlıurfa 1st Administrative Court offered a contrasting example by annulling a deportation order based on a G-82 security code. The court explicitly relied on the principle of the presumption of innocence, noting that there were no ongoing criminal proceedings against the applicant and that enforcing the deportation order under such circumstances would constitute a violation of this fundamental principle.¹⁷⁰ Reports from lawyers suggest that individuals labelled with the code G-89 are often from Chechnya or the Caucasus, with most of them having entered Türkiye legally and valid residency permits for many years¹⁷¹. Stakeholders in **Izmir** observed that the majority of G codes are issued to Syrians and Iraqis, and that this application is prevalent among Iraqis living in Samsun, Kutahya, Ordu, Afyon, and Manisa. Personal issues among Iraqis or Syrians who relayed false information to Turkish intelligence services may be an explanation of this practice.¹⁷²

Stakeholders in Istanbul observed that any non-Syrian who has entered or stayed in Syria, even once, is almost automatically labelled as a jihadist fighter and issued a G-code.¹⁷³ The 1st Administrative Court of Izmir is regarded as one of the best courts for the impartial evaluation of code cases, and stakeholders are more likely to receive favourable rulings from it than from other courts.¹⁷⁴ In many cases,¹⁷⁵ the 1st Administrative Court of Ankara rulings annulling the issuance of a security restriction code are later overturned by higher instance courts.¹⁷⁶

¹⁶⁴ Information provided by a stakeholder, June 2023.

¹⁶⁵ T.C. Ankara 1. İdare Mahkemesi, 2023/2293 E., 2024/713 K., 01.03.2024 T.

¹⁶⁶ T.C. Ankara Bölge İdare Mahkemesi 10. İdari Dava Dairesi 2024/4260 E., 2024/4979 K., 23.09.2024 T.

¹⁶⁷ T.C. Afyonkarahisar 1. İdare Mahkemesi, 2024/775 E., 2024/1231 K., 30.12.2024 T.

¹⁶⁸ T.C. Afyonkarahisar 1. İdare Mahkemesi, 2024/772 E., 2024/1210 K. 30.12.2024.

¹⁶⁹ T.C. İzmir 1. İdare Mahkemesi, 2024/1745 E., 2025/291 K., 30.01.2025 T.

¹⁷⁰ T.C. Şanlıurfa 1. İdare Mahkemesi 2024/257 E., 2024/1331 K., 04.07.2024 T.

¹⁷¹ Global Detention Project, Türkiye: Submission to the Committee against Torture, June 2024.

¹⁷² Information provided by a stakeholder, May 2023.

¹⁷³ Information provided by a stakeholder, May 2025

¹⁷⁴ Information provided by a stakeholder, May 2023.

¹⁷⁵ See e.g. District of Ankara, Decision 2018/462, 7 September 2018, which overturned the 1st Administrative Court of Ankara Decision 2018/524 of 14 March 2018.

¹⁷⁶ Information provided by multiple stakeholders, May 2023.

In June 2025, a joint report by MAZLUMDER, the Platform for Refugee Rights, and ULFED raised concerns regarding the use of security restriction codes (*tahdit kodları*), noting their severe impact on individuals and potential risks to the right to life. The report highlighted that the absence of an effective appeal or oversight mechanism, and observed that the existing administrative litigation process averages 1.5 years and results in dismissal of most cases. It called, for the establishment of a review commission composed of representatives from relevant authorities and a dedicated administrative mechanism to ensure timely and effective mechanisms.¹⁷⁷

In 2024, particularly following the incidents in Kayseri, widespread arbitrary detention and cancellation (see: Exclusion and cancellation of temporary protection) linked to security codes occurred. Consequently, many individuals avoided contacting approaching the PDMM offices to inquire about their security status. These concerns were well-founded, based on real cases where acquaintances were suddenly apprehended after it was revealed they had a security code when they made inquiries. This led to an informal practice in which people paid approximately 100 USD to certain individuals who provided screenshots from the GöçNet system showing security code information. Lawyers have also utilized these screenshots to file lawsuits, given the difficulty in obtaining accurate official information about these codes.¹⁷⁸

Operations targeting irregular migration

In previous years, the authorities conducted 'peace practices' and what were commonly referred to as sweeping operations targeting irregular migration, particularly in major cities.¹⁷⁹ Currently, these terms are no longer used; instead, **Kalkan (Shield) operations**, are carried out against migrant smuggling organisers and irregular immigrants, especially in metropolitan and border cities, often where mobile migration points are located. As of May 2025, 37 Kalkan operations were carried out in various cities. Sometimes operations were carried out simultaneously in different cities, while sometimes operations were targeted a specific neighbourhood in a city. In September 2024, it was announced that, during four days of operations which were carried out in 27 cities (İzmir, Edirne, Kocaeli, Muğla, Van, Antalya, İstanbul, Kırklareli, Konya, Adana, Amasya, Aydın, Bilecik, Bitlis, Erzincan, Eskişehir, Gaziantep, Hakkari, Kayseri, Niğde, Ordu, Sakarya, Samsun, Şanlıurfa, Bayburt, Karaman and Osmaniye) 84 migrant smuggler was apprehended and 25 of them were arrested. During the same group of operations 1029 irregular migrants were apprehended¹⁸⁰. From the beginning of 2023 to May 2023, 40,480 irregular immigrants were caught, 93% of them (37,785) were deported, and the total number of deportations since 2016 reached 487,735.¹⁸¹ According to the Minister of Interior, Ali Yerlikaya, the total number of deportations in 2024 reached 141,000 — a figure he claimed to be the highest in Türkiye's history and comparable to the deportation statistics of Frontex.¹⁸² From 1 June 2023 to 11 April 2025, the migrants without a regular status who have been deported are approximately 260,000.¹⁸³

Mobile migration points¹⁸⁴ carry out identity checks of foreigners they suspect of being irregular migrants by law enforcement units (police, and gendarmerie) and if the document that allows the legal stay cannot be shown or if any issues arise, they are being taken to mobile migration points where the PMM staff can query data with fingerprints. Accordingly, these mobile units are equipped with a biometric fingerprint detection system, the GocNet database, an interpreter, and a PDMM expert. Authorities also plan to install cameras inside the units, which typically operate from a minibus¹⁸⁵. When foreigners who do not have a

¹⁷⁷ Mazlumder, Göç Politikasını Beraber İyileştirelim, 20.06.2025, available [here](#)

¹⁷⁸ Information provided by multiple stakeholders, February, April, May, June 2025

¹⁷⁹ Anadolu Agency, 'Peace Practice' was carried out to combat irregular migration', 29 January 2022. Available in Turkish [here](#); PMM, '2016 Yılından Bu Yana Kolluk Birimlerimizce Toplam 38.117 Göçmen Kaçakçısı Yakalandı, 9.288'i Tutuklandı', 20 April 2022, available in Turkish [here](#).

¹⁸⁰ T. C. İçişleri Bakanlığı, Göç İdaresi Başkanlığı, "Kalkan-27" Operasyonlarında 84 Göçmen Kaçakçısı, 1029 Düzensiz Göçmen Yakalandı, 25.09.2024, available [here](#)

¹⁸¹ PMM, 20.05.2023, Son Günlerde Sınırlarımızda Çekildiği İddiasıyla Dolaşıma Sokulan Gerçek Dışı Paylaşımına İlişkin Basın Açıklaması available [here](#).

¹⁸² AA, İçişleri Bakanı Ali Yerlikaya, AA Editör Masası'nda Soruları Yanıtladı, 25.12.2024, available [here](#)

¹⁸³ T.C. Göç İdaresi Başkanlığı İçişleri Bakanı Ali Yerlikaya: "Türkiye, Göç Yönetiminde Dünyaya Model Ülke", 16.04.2025, available [here](#)

¹⁸⁴ Haber Turk, Göç İdaresi Başkanı Toros: 1 Haziran'dan bu yana 45 bin 454 göçmen sınır dışı edildi, 5 October 2023, available [here](#).

¹⁸⁵ AA, Ibid [here](#).

legal right to stay in Türkiye are identified, they are sent to the removal centres and the administrative detention and deportation process is initiated. The total number of mobile migration points is 270, and they are present in 81 provinces. Since 19 July 2023, a total of 2,542,274 individuals have been checked at these mobile migration points, resulting in the detection of 164,842 irregular migrants. Authorities reported that, over time, the proportion of individuals identified as irregular migrants has significantly decreased. For instance, during the first three months of implementation, 49,999 individuals were checked, and 74.5% (37,289) were identified as irregular migrants. By contrast, in December 2024, the number of checks increased substantially to 256,377, yet only 2.7% (7,164 individuals) were identified as irregular migrants.¹⁸⁶ In practice, according to observation of some stakeholders, there are some unofficial quotas for each police to capture certain numbers of migrants¹⁸⁷. Some stakeholders also emphasized that the increasing number of mobile migration points had a significant impact on social life, as many individuals began to hesitate to go outside. Additionally, certain foreigners apprehended at these points were directly transferred to border gates without being processed in a removal centre. In 2024, the number of Mobile Migration Points in Gaziantep increased from 5 to 20. These points were generally established in front of public institutions such as hospitals and courthouses. In addition to irregular migrants, individuals holding International Protection (IP) or Temporary Protection (TP) IDs who were unable to verify their addresses also encountered difficulties at these locations.¹⁸⁸ According to Ali Yerlikaya, in 2025, the proportion of individuals identified as irregular migrants decreased to 1.8%, down from 74.5% two years earlier.¹⁸⁹

Afghans have been labelled as 'illegal migrants' by the press and government officials, facing restrictive measures. In January 2022, Türkiye resumed deporting 'illegal Afghans' via Ariana Airlines and charter flights. Former Minister Soylu mentioned that five charter flights were departing every 3-5 days¹⁹⁰. By September 2022, 186 charter flights had returned 44,786 Afghans, and by October 2022, 78,716 irregular migrants had been deported since January 2022. Deportations of Afghans increased by 146% over 2022¹⁹¹, and continue during 2023. The detailed data regarding the charter flights have not been shared in 2023. In the first quarter of 2023, the number of immigrants deported from all nationalities was 21,211. With the 15 charter flights 2,319 migrants and with scheduled flights, 4,526 migrants were deported to Afghanistan¹⁹². Sometimes Afghans are deported to Pakistan with the charter flights with Pakistan nationals¹⁹³. The other statements regarding deportations did not provide the details regarding the nationalities. In August 2024, the Minister of Interior, Ali Yerlikaya, announced that 163,745 irregular migrants had been deported over the previous 14 months, marking a 20% increase compared to the previous period and reportedly representing the highest deportation figure in Türkiye's history. He also noted that Türkiye had conducted more deportations than all EU countries combined during this period. Since 4 June 2023, a total of 121 charter flights had deported 22,987 irregular migrants.¹⁹⁴

The vast majority of returns from removal centres are believed not to be voluntary and there are serious concerns about people being forced to sign voluntary return forms.¹⁹⁵ Detained migrants also frequently criticised the conditions in detention centres.¹⁹⁶ As defined in a report¹⁹⁷ the conditions in the removal centres 'contribute the degradation of the individual's dignity and constituting forms of mistreatment, violating the rights of detainees and perpetuating their suffering'. Although legally lawyers can appeal a deportation decision and applicants are allowed to remain in the territory until the time for exercising their

¹⁸⁶ AA, Ibid.

¹⁸⁷ Information provided by stakeholders, March – April 2024.

¹⁸⁸ Information provided by stakeholders, March 2025.

¹⁸⁹ T.C. İçişleri Bakanlığı, İçişleri Bakanımız Sayın Ali Yerlikaya: Ülke Genelinde Düzensiz Göçe Yönelik Düzenlenen Denetimlerimizde 509 Düzensiz Göçmen Yakalandı, 22.05.2025, available [here](#).

¹⁹⁰ Duvar, 'Minister Soylu: Süleyman Soylu: We will not give temporary protection to those coming from Damascus', available in Turkish [here](#).

¹⁹¹ PMM, 'Yılbaşından Bugüne 72.578 Kaçak Göçmen Sınır Dışı Edildi', 23 August 2022, available in Turkish [here](#).

¹⁹² TRT Haber, 13.03.2023, Sınır dışı edilen düzensiz göçmen sayısı 21 bin 211'e ulaştı, available [here](#).

¹⁹³ Information provided by a stakeholder, March 2024.

¹⁹⁴ T.C. İçişleri Bakanlığı Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya: "Düzensiz Göçle Mücadelede Bütün Zamanların En İyi Sayılarını Yakaladık", 10.08.2024, available [here](#).

¹⁹⁵ Information provided by multiple stakeholders, May 2023 & Information provided by stakeholders, March - April 2024.

¹⁹⁶ Asya Robins, 'Sınır dışı kararı verilen İranlı mülteciler geri gönderme merkezindeki koşulları anlattı: 'Şiddet normal bir şey'', *BBC News*, 16 February 2022, available [here](#).

¹⁹⁷ Global Detention Project, Türkiye: Submission to the Committee against Torture, June 2024.

right to an effective remedy expires, in practice this rule is not always applied, and the risk of deportation remains¹⁹⁸.

2.2. Appeal before the Administrative Court

The appeal against a deportation decision is a remedy separate from remedies in the international protection procedure.¹⁹⁹ It has an automatic suspensive effect, following a review of the LFIP in reforms from December 2019, and the deletion of exceptions to the right to remain on the territory.²⁰⁰ Appeals are made with legal counsel or by a direct petition to the court.

However, removal decisions must be appealed before the Administrative Court within seven days of notification.²⁰¹ With an amendment introduced in 2024, the procedures for challenging deportation orders were expedited. According to the new regulation, the case is considered concluded after the administration submits its initial defense. If official notification cannot be delivered to the applicant's address, the timeframe for deeming the case as not filed has been reduced from one year to two months. It is at the court's discretion to decide whether to hold a hearing. Applications submitted after the conclusion of the case, during interim decisions, or following a hearing must be finalized within 15 days²⁰². Deportation decisions are often poorly communicated to individuals, hindering their ability to notify legal representatives or family members, this lack of communication obstructs timely appeals. In practice, detainees face obstacles in accessing legal representation, as lawyers are frequently misinformed about the detainee's location or case status, significantly delaying legal assistance.²⁰³ In 2024, the practice of frequent transfer of individuals, including unaccompanied minors whose age appeared to be over 18 on paper²⁰⁴, from one centre to another centre made it very hard for the lawyers to trace the location and to reach out to the person²⁰⁵. Accessing information about foreigners detained is very difficult due to the lack of a centralised system²⁰⁶ and Lawyers reported difficulties in trying to gather all the information and write an appeal in seven days particularly if the case needs translation work or there are difficulties accessing a client in detention²⁰⁷. This short time limit has a negative effect on both access to justice and the quality of the lawyer-client relationship. Some courts exercise the seven-day rule very strictly, which creates significant problems, as Administrative Court decisions on deportation appeals are final.

Appeals against deportation and administrative detention decisions mean different practices in different provinces since there are no higher judicial bodies or higher authority to standardise practices. Lawyers have found it difficult to prepare and file an appeal in such a short period. Notification is also a common issue in removal centres. The seven-day time limit starts with the notification of the deportation decision, so it carries special importance. Due to issues with official notifications, lawyers cannot be certain whether a deportation order will be issued following an applicant's apprehension, or on what grounds. As a result, it becomes difficult to take prompt legal action upon being informed of a detention. According to a stakeholder, some applicants do not inform their lawyers for several days after being apprehended, as they initially expect to be released, which results in the loss of a significant portion—often around half—of the legal time limit to challenge the decision.²⁰⁸ When the file of the applicant is sent to the court by PDMM, sometimes there is no notification. In this case, the PDMM sometimes include a note such as "refused to give their signature" before sending the documents to the court. The 1st Administrative Court of **Izmir** requested the Constitutional Court to conduct a normative review of the seven-day limit in January 2023.²⁰⁹

¹⁹⁸ Bianet, 21.09.2023, "Bir Geri Gönderme Merkezine günde 6 bin kişi götürülüyor" available [here](#).

¹⁹⁹ Article 53 LFIP.

²⁰⁰ Law No 7196 amending several acts, 6 December 2019, available in Turkish [here](#).

²⁰¹ Article 53(3) LFIP. This time limit has been ruled to be in line with the Turkish Constitution: Constitutional Court, Decision 2016/135, 14 July 2016, available in Turkish [here](#).

²⁰² Law no 7533/36 21.11.2024, available in Turkish [here](#)

²⁰³ Global Detention Project, Türkiye: Submission to the Committee against Torture, June 2024 & Information provide by stakeholders, March – April 2024.

²⁰⁴ Information provided by a stakeholder, June 2023.

²⁰⁵ Information provided by stakeholders, March 2024.

²⁰⁶ Global Detention Project, Türkiye: Submission to the Committee against Torture, 12 June 2024, available [here](#).

²⁰⁷ Information provided by stakeholders, March – April 2024.

²⁰⁸ Information provided by a stakeholder, April 2025.

²⁰⁹ Information provided by a stakeholder, May 2023.

The Constitutional Court of Türkiye reviewed a petition challenging the reduction of the appeal period for deportation orders from 15 days to 7 days as stipulated in Article 53, Paragraph 3 of the LFIP. The arguments highlighted that the shortened appeal period is of vital importance because it undermines constitutional guarantees, making deportation easier and preventing foreigners in removal centres from adequately understanding their right to appeal or accessing a lawyer. Difficulties in determining the location of detained foreigners and other obstacles, such as not speaking Turkish, lack of financial means, and being under surveillance in removal centres, were cited as reasons why the 7-day period is insufficient, thus excessively restricting the right to seek legal remedy and defend against deportation, potentially leading to ill-treatment in their home countries. The Constitutional Court found that the reduction was justified by the need to limit the freedom of foreigners and reduce accommodation costs. Referring to the European Convention on Human Rights Protocol No. 7, it noted that while it mandates an opportunity to challenge deportation decisions, it does not specify a minimum appeal period. Concluding that the 7-day period was not excessively short to the extent that it prevents the preparation of an appeal or securing legal representation, it ruled that the 7-day appeal period did not violate the Constitution, without addressing the mentioned challenges.²¹⁰ According to stakeholders, in recent years - particularly in 2024 - administrative courts have begun to apply the seven-day rule more rigidly. Previously, courts were more flexible and could accept the date on which the applicant's lawyer was informed as the starting point for the deadline. For example, the Konya 1st Administrative Court rejected the appeal of an Afghan national whose deportation order was issued on 7 November 2023. Although the applicant became aware of the legal consequences and challenged the decision on 15 November 2023 - eight days later - the court dismissed the case for missing the deadline.²¹¹

The mere existence of a criminal investigation can be sufficient for a deportation decision to be issued. An acquittal has not stopped deportations. Deportation decisions have started to be made even for those whose trial was pending and brought before the court due to a summary offense.²¹² The quality of decisions often depends on the judges. According to stakeholders, the issuance of deportation orders solely on the basis of criminal investigations has significantly increased in 2024. The grounds for these decisions have become increasingly tenuous, with cases based, for example, on the alleged actions of a family member or even on situations where the individual concerned is merely the complainant. Although some of these weakly substantiated deportation orders can be overturned by administrative courts when challenged, the number of such successful challenges has declined. This is due both to the rising number of questionable decisions and to structural barriers—particularly the difficulty of securing legal assistance and filing an appeal within the strict seven-day deadline.²¹³

For instance, in 2024, the İzmir 1st Administrative Court annulled the deportation order of a Syrian national that had been issued based on a criminal investigation targeting the applicant's father, who was suspected of membership in an armed terrorist organization. The court reaffirmed the fundamental principle that criminal responsibility is personal.²¹⁴ Likewise, in January 2025, the Eskişehir 1st Administrative Court cancelled a deportation order issued against an Iranian transgender woman, based on a criminal investigation in which she was actually the complainant. Notably, a dissenting judge argued that the deportation order was lawful, reasoning that the applicant—being a transgender woman—had attracted public attention due to the nature of the incident, which occurred at approximately 3:00 AM in a residential neighbourhood and involved shouting, loud arguments, and the breaking of glass and bottles. According to this dissenting view, the disturbance amounted to a violation of public order, thereby justifying the deportation, regardless of her role as complainant.²¹⁵

There are data verification centres for refugees in **İzmir** where individuals can update the information on their ID cards as well as a separate building from the PDMM. In the two communications, it was implied that the software used by the PMM (Göç Net database) is now connected to UYAP and can draw on

²¹⁰ Resmi Gazete, 27.06.2023, available [here](#).

²¹¹ T.C. Konya 1. İdare Mahkemesi, 2023/1339 E., 2024/47 K., 11.01.2024 T.

²¹² Information provided by a stakeholder, May 2022.

²¹³ Information provided by stakeholders in March, April and May 2025.

²¹⁴ T.C. İzmir 1. İdare Mahkemesi, 2024/811 E., 2024/2422 K., 31.10.2024.

²¹⁵ T.C. Eskişehir 1. İdare Mahkemesi, 2024/1594 E., 2025/51 K. 24.01.2025 T.

personal information about foreigner nationals regarding their legal cases, etc. PMM did not have this access in the past. PMM does not require the existence of a final judgment - it is sufficient to identify a criminal file linked to the foreigner. In the past, in data verification centres, deportation procedures could be initiated if the foreigner had a security-related code such as G87. However, according to a stakeholder, this system may also be used to the detriment of foreigners. In 2024, a foreigner residing in Türkiye with a family residence permit, and the mother of a one-month-old baby, was apprehended at her home and transferred to a Removal Center. Thanks to the intervention of her lawyer, it was discovered that she had been assigned an N-99 code due to an argument she had with a doctor five years earlier—an incident that ultimately resulted in her acquittal. Despite this, and although the authorities could have accessed the underlying details of the code through the connection between UYAP and PMM systems, she was detained without any apparent effort to verify the actual basis of the code. This decision was taken while she was still breastfeeding her new-born, raising serious concerns about the proportionality and due diligence of the procedure.²¹⁶

Since first-instance Administrative Court decisions are not shared with the public in Türkiye, it is difficult for experts and lawyers to assess the effectiveness and quality of judicial review. However there are some initiatives trying to collect and publishing the decisions.²¹⁷ In the past, there was no uniform application of the *non-refoulement* principle in Administrative Court reviews of deportation decisions. Even where the execution of removal was suspended by Administrative Courts, compliance with court orders was reported to be arbitrary and dependent upon the individual police officers in question.

In 2024 and in the beginning of 2025, there were some positive decisions to annul deportations. Two Palestinian nationals who admitted to attempting to irregularly cross the Turkish-Greek border and were subsequently apprehended succeeded in having their deportation orders annulled. In its decisions, the İzmir 1st Administrative Court emphasized the ongoing situation in Palestine following 7 September 2023, particularly the continued bombardment of the Gaza Strip and the widespread killing of civilians. The court found that the deportation order had been issued without a sufficient individual assessment of these circumstances²¹⁸. In separate cases involving two Afghan applicants who had both previously worked for the military in Afghanistan before the Taliban's takeover in 2021, the Aydın 1st Administrative Court and the Erzurum 1st Administrative Court annulled the deportation orders.²¹⁹ Another Afghan national, whose student residence permit had been rejected despite being enrolled at a university, succeeded in annulling his deportation order. In its decision, the İstanbul 15th Administrative Court referred to a 2022 report²²⁰ published by the Human Rights and Equality Institution of Türkiye, (TIHEK), which underlined the necessity of conducting a thorough assessment before deciding on the deportation of Afghan nationals to Afghanistan.²²¹ In contrast, the İzmir 1st Administrative Court rejected the case of an Afghan woman challenging her deportation order. She argued that during the assessment of her international protection application, she had been incorrectly categorized as a dependent of her family, whereas her individual claim—as an Afghan woman at risk under Taliban rule—should have been assessed separately. The court held that, since her claims had already been addressed during the appeal process against the rejection of her international protection application, no further examination was necessary.²²²

These last two examples raise concerns regarding the courts' differential treatment of applicants based on perceived functionality or social contribution, as one case involved a university student while the other concerned a woman seeking asylum on individual protection grounds.

If a deportation order is canceled by the court, the individual is issued a T8 Document by PDMM offices, which clearly indicates the official notification of the cancellation. However, stakeholders believe that in

²¹⁶ Information provided by a stakeholder, April 2025

²¹⁷ Mülteci-Der, Karar Bankası available [here](#); Mülteci Hakları Merkezi, Karar Bankası [here](#)

²¹⁸ T.C. İzmir 1. İdare Mahkemesi, 2024/2706 E., 2025/708 K., 06.03.2025 T.; T.C. İzmir 1. İdare Mahkemesi, 2024/2707 E., 2025/707 K., 06.03.2025 T.

²¹⁹ T.C. Aydın 1. İdare Mahkemesi, 2024/318 E., 2024/945 K., 26.11.2024 T.; T.C. Erzurum 1. İdare Mahkemesi, 2024/417 E., 2024/1049 K., 07.06.2024 T.

²²⁰ TIHEK, Sınır Dışı Edilen Yabancılar ve Geri Gönderme Yasağı, available [here](#)

²²¹ T.C. İstanbul 15. İdare Mahkemesi, 2023/1531 E., 2024/1091 K., 27.02.2024 T.

²²² T.C. İzmir 1. İdare Mahkemesi, 2024/603 E., 2024/2220 K., 09.10.2024 T.

most cases—especially for those who previously applied for international protection—obtaining this decision does not significantly change the individual’s situation.²²³ See: ([Subsequent applications](#))

Article 60(a) LFIP on assisted voluntary return was amended in December 2019 to add that in-kind or cash support can be provided to persons deemed appropriate by the PMM in cases of voluntary return to their country of origin.²²⁴ PMM created its own assisted voluntary return mechanism; however, such mechanism lacks transparency, and the number of returnees is unclear. There are ongoing legislative works for enactment of a regulation on assisted voluntary return, which could potentially address the issues of transparency.²²⁵ Problems regarding voluntary returns and the process remained the same in 2024. (For more details, see [Temporary Protection Procedure section](#)) Voluntary returns are ongoing and those who returned are mostly Syrians.²²⁶ According to Human Rights Watch,²²⁷ since 2017, thousands of Syrian refugees have been often coerced into signing “voluntary” return forms and deported to northern Syria, in July 2023 alone, Türkiye sent back over 1,700 Syrians into the Tel Abyad area. PMM mentioned in the Annual Report 2023 there was 30% increase in voluntary and safe returns.²²⁸ According to the UTBA report, most of the unlawful deportations were carried out under the guise of voluntary repatriation, with officials coercing applicants into signing the relevant forms. In particular, at the Şanlıurfa, Gaziantep, and Adana Removal Centres, officials reportedly applied psychological pressure on detainees to obtain their signatures.²²⁹ (See: [Material conditions in Detention](#))

Stakeholders kept reporting that people who had been persuaded to sign a voluntary return form from removal centres came back to Türkiye in 2023. The temporary protection regulation provides a legal opportunity for re-arrivals, as it is stipulated in the law that re-application will reactivate IDs. In practice, people either cannot access registration or their applications are rejected, and they have to appeal against the decision.²³⁰

2.3. The complaint procedure before the Constitutional Court

An individual complaints procedure is available before the Constitutional Court, which is styled after the individual complaints procedure of the European Court of Human Rights (ECtHR) and is partially aimed at reducing the high number of complaints against Türkiye at the ECtHR. Individuals can file an individual complaint with the Constitutional Court on claims of a violation of “any of the fundamental rights and liberties provided by the Turkish Constitution and safeguarded by the ECHR and its Protocols” within 30 days of the exhaustion of all existing administrative and judicial remedies.²³¹

While individual complaints to the Constitutional Court do not carry suspensive effect, the applicants can request an urgent interim measure as per Article 73 of the Rules of Court on account of “serious risk on the applicant’s life, physical and moral integrity”. This urgent application procedure by the Constitutional Court, in situations of imminent risk of deportation where the person concerned alleges a risk to their life or risk of torture if returned, is similar in nature to the Rule 39 procedure of the ECtHR. From October 2016 to December 2019, the Constitutional granted 1,545 interim measures to halt deportation decisions when automatic suspensive effect of the appeal of deportation orders were removed with a legislative amendment and stopped this practice when a legal amendment to these and other articles of the LFIP was made in December 2019 to bring back the automatic suspensive effect.²³² Lawyers no longer directly apply to the Constitutional Court when an administrative entity unlawfully deports their client but to the relevant administrative court.

²²³ Information provided by stakeholders, February and March 2025.

²²⁴ Mülteci-Der, *Joint Assessment: Proposed Amendments in the Law on Foreigners and International Protection of Türkiye*, 4 December 2019, available [here](#).

²²⁵ Information provided by a stakeholder, June 2023.

²²⁶ Information provided by a stakeholder, May 2023 & Information provided by stakeholders, March – April 2024.

²²⁷ HRW, “Everything is by the Power of the Weapon”, 29 February 2024, available [here](#).

²²⁸ PMM, Faaliyet Raporu 2023, available [here](#).

²²⁹ TBB, Hukuka Aykırı Gerçekleştirilen Sınır Dışı İşlemlerine İlişkin Rapor, Haziran 2024 [here](#).

²³⁰ Information provided by a stakeholder, May 2023 & Information provided by a stakeholder, April 2024

²³¹ Articles 45-51 Law No 6216 on the Formation and Procedures of the Constitutional Court.

²³² Law No 7196 amending several acts, 6 December 2019, in Turkish [here](#).

On 17 July 2024, the Constitutional Court ruled on the application of an Iraqi national (Application No: 2020/18122). The Court found no violation of the applicant's rights concerning respect for private and family life or the prohibition of ill-treatment. It also declared the claim related to the right to a fair trial inadmissible due to lack of jurisdiction. The applicant had argued that he would be at risk of persecution by al-Hashd al-Shaabi militias if returned to Iraq. While the Court acknowledged that the applicant had previously been forced to pay money to Daesh while in Iraq, it concluded that this did not establish any affiliation with the group. Furthermore, the Court was not persuaded that the applicant, as a Sunni Muslim, would face a real risk of persecution upon return.²³³

According to stakeholders, following its publication, this judgment has been frequently relied upon by administrative courts to reject the international protection claims of Iraqi nationals who assert that they are at risk in Iraq due to their Sunni identity.²³⁴ Stakeholders also observed that the Constitutional Court has reduced the number of interim measure decisions compared to previous years. According to their assessments, the Court appears more inclined to grant interim measures in cases involving Syrian nationals, while similar requests from non-Syrian applicants are less frequently accepted.²³⁵

The European Court of Human Rights convicted Türkiye in a lawsuit filed on the grounds that Türkiye illegally deported a Syrian temporary protection holder to his country.²³⁶ In 2022, the European Court of Human Rights found a violation of articles 3, 5 and 13 of the ECHR in *Akkad v. Türkiye* judgement on the ground of expulsion of the temporary protection holder applicant to Syria.²³⁷

On 6 February 2024, the European Court of Human Rights (ECtHR) delivered its judgment in the case of *J.A. and A.A. v. Türkiye* (case no. 80206/17).²³⁸ The case involved Iraqi applicants and their four children who entered Türkiye in 2014 with valid tourist visas after ISIS bombed their house in Iraq. They had applied for residence permits but were arrested and faced deportation. They submitted an asylum request and challenged the deportation order. The ECtHR emphasised the obligation of states to thoroughly assess the risk of ill-treatment in the destination country by rigorously examining asylum applications. The Court found that Turkish authorities failed to adequately assess the applicants' asylum requests and did not inform them properly about the rejection or the deportation orders. The Istanbul Administrative Court and the Constitutional Court did not sufficiently consider the risk of ill-treatment in Iraq. Consequently, the ECtHR concluded that deporting the applicants to Iraq would violate Articles 2 and 3 of the Convention, which protect the right to life and prohibit torture and inhuman or degrading treatment.²³⁹ On 21 March 2024, another decision ruled by ECtHR²⁴⁰ (application no. 14820/19) on the deportation of an Iranian applicant faced expulsion to Iran, where she alleged that she would be at real risk of life imprisonment or death due to her conversion from Islam to Christianity. The Court unanimously held that deporting the applicant without a comprehensive evaluation of the risks involved would breach her rights under Articles 2 and 3 of the Convention. Regarding the pushback incidents that occurred on the Turkish-Greek border in 2024, one case against Greece has been communicated²⁴¹, and two cases²⁴² were finalized in January 2025. (See: AIDA 2024 Greece)

²³³ T. C. Anayasa Mahkemesi N.S.M.M. Başvurusu, 2020/18122, 17.07.2024, R.G.: 23.12.2024 – 32761.

²³⁴ Information provided by a stakeholder, April 2025.

²³⁵ Information provided by stakeholders, March, April and May 2025.

²³⁶ On the contrary, decisions of the Administrative Court are notified to the PDMM since they are party to the proceedings. ECHR, *Akkad v. Türkiye*, application number: 1557/19, 21 June 2022 available [here](#).

²³⁷ AKKAD/ TÜRKİYE KARARI (Başvuru No: 1557/19) AKKAD v. TURKEY [Turkish Translation] by İstanbul Bar Association, available [here](#).

²³⁸ CASE OF J.A. AND A.A. v. TÜRKİYE (Application no. 80206/17), available [here](#).

²³⁹ Ibid.

²⁴⁰ ECtHR, CASE OF B.S. v. TÜRKİYE (Application no. 14820/19), Strasbourg, 21 March 2024, available [here](#).

²⁴¹ ECHR, *Salman Muhammad v. Greece*, 34331/22, communicated on 10.06.2024, available [here](#).

²⁴² ECHR, *G.R.J. v. Greece*, 15067/21, 07.01.2025, available [here](#); ECHR, *A.R.E. v. Greece*, 15783/21, 07.01.2025, available [here](#).

3. Registration of the asylum application

Indicators: Registration

1. Are specific time limits laid down in law for making an application? Yes No
❖ If so, what is the time limit for lodging an application?
2. Are specific time limits laid down in law for lodging an application? Yes No
❖ If so, what is the time limit for lodging an application?
 - The applicant has to register at a PDMM within 15 days.
3. Are registration and lodging distinct stages in the law or in practice? Yes No
4. Is the authority with which the application is lodged also the authority responsible for its examination? Yes No
5. Can an application be lodged at embassies, consulates or other external representations? Yes No

According to LFIP, the PDMM is the responsible authority for receiving and registering applications for international protection.²⁴³

3.1. Applications on the territory

Applications for international protection are made to the “Governorates” “in person”, indicating that applicants are expected to physically approach the PDMM and personally present their request.²⁴⁴ A lawyer or legal representative may not make applications for international protection. However, a person can apply on behalf of accompanying family members, defined to cover the spouse, minor children and dependent adult children as per Article 3(1)(a) LFIP.²⁴⁵ Where a person wishes to file an application on behalf of adult family members, the latter written approval needs to be taken.

According to the law, for applicants who are physically unable to approach the PDMM premises to make a request for an international protection request, officials from the PDMM may be directed to the applicant’s location in order to process the application.²⁴⁶ In the same way, registration interviews with unaccompanied minors and other persons who are unable to report to the designated registration premises in the province may be carried out in the locations where they are.²⁴⁷ There is no indication that these provisions have been applied in practice so far.

Article 65 LFIP does not impose any time limits on persons for making an application as such, whether on the territory, in detention or at the border. However, Article 65(4) appears to impose on applicants the responsibility of approaching competent authorities “within a reasonable time” as a precondition for being spared from punishment for illegal entry or stay. The assessment of whether an application has been made “within a reasonable time” is to be made on an individual basis.²⁴⁸

The LFIP states that applications for international protection shall be registered by the PDMM.²⁴⁹ Applicants can request and shall be provided interpretation services for the purpose of the registration interview and later the personal interview.²⁵⁰

²⁴³ Türkiye is administratively divided into 81 provinces. The provincial governorate is the highest administrative authority in each province. Therefore, provincial directorates of all government agencies report to the Office of the Governor. The agency responsible for registering all applications for international protection is the PDMM, which technically serves under the authority of the Provincial Governorate.

²⁴⁴ Article 65(1) LFIP.

²⁴⁵ Article 65(3) LFIP.

²⁴⁶ Article 65(1) RFIP.

²⁴⁷ Article 65(2) RFIP.

²⁴⁸ Article 65(1) RFIP.

²⁴⁹ Article 69(1) LFIP.

²⁵⁰ Article 70(2) LFIP.

Access to the international protection procedure changed substantially in 2018 when the operation of RSD procedures by UNHCR ceased. Applications for international protection are now registered solely by the PDMM in the 81 provinces. In practice, however, if the PDMM is approached by an asylum seeker and cannot receive their application, it directs the person to another city so they can register the application there. Applicants are expected to register at the PDMM of the assigned city within 15 days. Failure to appear within 15 days leads to the application being considered as withdrawn (“cancelled”). PMM does not provide assistance with transportation costs but can refer applicants to NGOs such as SGDD-ASAM for assistance. UNHCR has been supporting the registration of persons in need of international protection by working with PMM and its PDMMs.²⁵¹

It was noted that PDMM found some new rejection causes. In the case of an Iranian residing in Türkiye with a valid residence permit who wishes to apply for international protection in October 2022, PDMM argued that the individual was a regular migrant and therefore could not apply for international protection. This was a verbal rejection from **Kocaeli** and **Kastamonu** PDMMs. They did not issue a decision but instead referred the Iranian person to another PDMM located in a small city.²⁵² The trend of not being able to apply for protection in case of residing in Türkiye previously with residence permit continued in 2023.

Article 69 LFIP does not lay down any time limits for the completion of registration by the PDMM, although its Implementing Regulation, the Regulation on Foreigners and International Protection (RFIP), requires applications to be recorded “within the shortest time on the institutional software system” of PMM.²⁵³ The RFIP provides that application authorities shall notify the applicant a date for their registration interview during the application if possible, otherwise at a later stage.²⁵⁴ According to stakeholders, when comparing two applicants - one who applies for international protection within one month of entry and another who waits two years - the former is more likely to have their application accepted, whereas the latter may be prevented from submitting an application altogether.²⁵⁵

In practice, the takeover of the process by PMM in September 2018 resulted in obstacles to access to the asylum procedure. Issues persisted in 2024 and arbitrariness increased after the takeover of registration of non-Syrians. It is difficult to assess the overall system since there is no standardised application.²⁵⁶ Accessing the application remains very difficult in 2024,²⁵⁷ the registration system remained the most significant barrier to accessing basic rights and services in 2024. Access to international protection registration became nearly impossible in certain provinces that were identified as closed for new applications and especially for certain groups without any specific vulnerabilities. Single women, people with serious health issues, and families, more often, were able to access the application. However, single men from Afghanistan, Pakistan, and Uzbekistan, faced significant challenges to be able to access application. The main public policy has seemed to be to leave people unregistered to push them to leave Türkiye or decrease the official numbers, except in vulnerable cases.²⁵⁸

In one case, an Afghan family - including a child with scoliosis - attempted to apply for international protection at the Manisa PDMM with the support of an NGO worker. However, their application was refused on the grounds that Afghanistan is now considered safe and that no serious conflict is ongoing in the country. In another case, a single woman from an African country approached the İzmir PDMM, where an official, displaying a dismissive attitude, verbally questioned her need for protection by asking, “What problem does that country have?”²⁵⁹ For instance, Afghan women with Hazara ethnic identity, and Afghan men who served in the military in Afghanistan (if they could prove their claims) could access applications faster, however, there were some cases who held student residence permits wanted to apply for protection

²⁵¹ UNHCR, ‘TÜRKIYE 2021 Operational Highlights’, 2022, available at: <https://bit.ly/3rwWHGT>.

²⁵² Information provided by a stakeholder, April 2023.

²⁵³ Article 70(4) RFIP.

²⁵⁴ Article 66(2) RFIP.

²⁵⁵ Information provided by a stakeholder, May 2025

²⁵⁶ Fabrizio Foschini, ‘Between the Devil and the Deep Blue Sea: No good options for Afghans travelling to and from Turkey’, 16 May 2022, available [here](#) & Information provided by stakeholders, March – April 2024.

²⁵⁷ Information provided by stakeholders, March- April 2025.

²⁵⁸ Information provided by a stakeholder, May 2023 & Information provided by stakeholders, March- April 2024.& Information provided by stakeholders April-May 2025.

²⁵⁹ Information provided by stakeholders April 2025.

after the Taliban took over were not able to access the application.²⁶⁰ According to stakeholders, in some cases, applicants are verbally informed by the PDMM that they will be contacted within one month. However, they are not provided with any official documentation confirming their application attempt or appointment. This leaves them vulnerable to potential apprehension, as they have no proof of having approached the authorities. Stakeholders noted that individuals who are told they will receive such a call often report never being contacted. If these individuals were formally registered at that stage, they could then be referred to another city through official procedures.²⁶¹

The registration interview serves to compile information and any documents from the applicant to identify identity, flight reasons, and experiences after departure from the country of origin, travel route, mode of arrival in Türkiye, and any previous applications for international protection in another country.²⁶² The PDMM may carry out a body search and checks on the personal belongings of applicants in order to confirm that all documents have been presented.²⁶³ Where an applicant is unable to present documents to establish their identity, the registration authorities shall rely on an analysis of personal data and information gathered from other research. Where such identification measures fail to provide the relevant information, the applicant's own statements shall be accepted to be true.²⁶⁴

Where there are concerns that an applicant may have a medical condition threatening public health, he or she may be referred to a medical check.²⁶⁵ Information on any special needs shall also be recorded.²⁶⁶ Since the termination of UNHCR registration activities in 2018, it is unclear how this is handled by the PDMM. Nevertheless, registration is generally allowed for asylum seekers facing emergencies such as pregnancy or severe illness, who are registered in order to make sure that they get medical assistance.²⁶⁷

At the time of applying, the asylum seeker must provide a hand-written, signed statement containing information about the international protection application in a language in which he or she is able to express himself or herself. The statement shall contain specific elements including the reasons for entering Türkiye, as well as any special needs of the applicant.²⁶⁸ Illiterate applicants are exempt from this requirement. Furthermore, the PDMM shall also obtain any supporting documents that the applicant may have with him or her and fill in a standard International Protection Application Notification Form, which will be delivered to the PMM Headquarters within 24 hours.

At the end of the registration interview, all the information recorded on the screen of the electronic system must be precisely read back to the applicant who will have the opportunity to make corrections.²⁶⁹ A printed version of the registration form filled in electronically is also handed to the applicant.²⁷⁰

The law states that the applicant will receive an International Protection Applicant Identification Card upon completion of registration.²⁷¹ The Ministry carries out the renewal and extension of International Protection Applicant Identification Card.²⁷² As of 24 December 2019, the LFIP provides that this document is also issued to applicants falling under the Accelerated Procedure or the inadmissibility provisions,²⁷³ and the obligation to renew Identification Cards every six months was abolished.²⁷⁴ According to stakeholders, the International Protection Applicant Identification Card may remain valid for one year or even longer in some cases.²⁷⁵

²⁶⁰ Information provided by stakeholders, March- April 2024.

²⁶¹ Information provided by stakeholders, April 2025.

²⁶² Article 69(2)-(4) LFIP.

²⁶³ Article 69(2) LFIP; Article 69(4) RFIP.

²⁶⁴ Article 69(3) LFIP; Article 69(3) RFIP.

²⁶⁵ Article 69(6) LFIP.

²⁶⁶ Article 70(5) RFIP.

²⁶⁷ Information provided by a stakeholder, May 2023.

²⁶⁸ Article 65(5) RFIP.

²⁶⁹ Article 70(6) RFIP.

²⁷⁰ Article 70(7) RFIP.

²⁷¹ Article 76(1) LFIP, as amended by Article 35 Law No 7148 of 18 October 2018.

²⁷² Article 76(1) LFIP, as amended by Article 81 Law No 7196 of 24 December 2019.

²⁷³ Article 76(2) LFIP.

²⁷⁴ Article 76(1) LFIP, as amended by Article 81 Law No 7196 of 24 December 2019.

²⁷⁵ Information provided by a stakeholder, May 2025.

Following this reform, the PDMM no longer issues a Registration Document when directing the asylum seeker to the assigned “province of residence” with a view to registering the international protection application. The only documentation the applicant receives after registering their application with the PDMM in the province where the application was submitted is the International Protection Applicant Identification Card which is generally valid for usually one month. Within one month, if the authorities complete their assessment, the applicant is invited to the PDMM where they initially applied and is officially referred to the appointed province, with an obligation to report there within 15 days. This official referral also functions as a travel permit, allowing the applicant to travel without risk of apprehension. If the authorities do not complete the assessment within two months, the identification card is renewed for an additional two months, and this cycle continues until the procedure is completed. As this procedure becomes prolonged, applicants tend to settle in the initial city where they were issued an ID card, making it difficult to relocate to the referred city due to having established a routine or entered into rental agreements, among other factors. However, if the applicant is denied the opportunity to submit their application at a certain PDMM and is told to approach another PDMM that “accepts” international protection applicants, then s/he is required to travel to the assigned province without being provided documentation to attest to their intention to seek international protection. In practice, people are often apprehended during police controls throughout the country and are thus at risk of being transferred to a Removal Centre²⁷⁶ (see [Detention of Asylum Seekers](#)).

On 30 June 2022, PMM announced that 1,169 districts would be closed to protection seekers registrations as of 1 July 2022 except for new-born registration and family reunifications. In early 2022, the previously unconfirmed ‘satellite city’ policy was publicly confirmed with the announcement of the ‘deconcentration policy.’²⁷⁷ Neighbourhoods with a 25% refugee density had been completely closed to registration, including Fatih, Esenyurt, Avcılar, Bahçelievler, Başakşehir, Bağcılar, Esenler, Küçükçekmece, Sultangazi and Zeytinburnu in **İstanbul**. The percentage later decreased to 20% and it is prohibited by PMM for any region or area in Türkiye to have a population of foreign nationals that is more than one-fifth of the total population. This includes both people who have made Türkiye their permanent home and those who are merely visiting the country. These districts are disclosed to foreign nationals seeking address registrations for temporary protection, international protection, and residence permits, as well as changes to their city of residence if they are foreign nationals with residence permits or are under temporary or international protection, with the exception of newborns and instances of nuclear family reunification. Because of this, no non-Turkish national are able to select any of these 1,169 neighbourhoods in Türkiye as their registered address for official matters, nor will they be able to ask the authorities to change their address to any of these places, in 58 cities (Adana, Adıyaman, Afyon, Ağrı, Aksaray, Amasya, Ankara, Antalya, Bartın, Batman, Bilecik, Bingöl, Bolu, Burdur, Bursa, Çanakkale, Çankırı, Çorum, Diyarbakır, Düzce, Elazığ, Erzincan, Gaziantep, Giresun, Gümüşhane, Hatay, Iğdır, Isparta, İstanbul, İzmir, Kahramanmaraş, Karabük, Kastamonu, Kayseri, Kırklareli, Kırşehir, Kilis, Konya, Kütahya, Malatya, Mardin, Mersin, Muğla, Muş, Nevşehir, Niğde, Osmaniye, Rize, Sakarya, Samsun, Sinop, Sivas, Şanlıurfa, Tokat, Trabzon, Uşak, Yalova, Yozgat).²⁷⁸ According to the latest notice in 2024, the number of districts remains the same, but the number of cities increased to 63 without any details of which cities are added in 2023.²⁷⁹ According to the YİMER call center, the closed neighbourhood policy does not apply to foreigners of Turkish descent.

The distinction between the ‘*province of residence*’ policy and the ‘*deconcentration*’ policy is significant, though the two are often conflated due to their overlapping implementation practices. The province of residence policy applies specifically to applicants and status holders of international protection and temporary protection. It requires them to remain within the province where they are registered and imposes strict sanctions, including the risk of ID or application cancellation, if they violate this obligation. In contrast, the deconcentration policy is applied more broadly and aims to redistribute foreigners — including those holding residence permits — from provinces with high refugee density to provinces with lower density,

²⁷⁶ Information provided by stakeholders, March – April 2024 and May 2025.

²⁷⁷ İkamet, Türkiye Closes 781 Neighborhoods to Foreigners, Addresses, May 22, available in English [here](#)

²⁷⁸ PMM, ‘Mahalle Kapatma Duyurusu hk.’, 30 June 2022, available in Turkish at: <https://bit.ly/44zWSQk>.

²⁷⁹ PMM, “İstanbul’da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı” İddialarına İlişkin Basın Açıklaması, 16 July 2023, available [here](#)

ostensibly to alleviate pressure on local services and social cohesion. While both policies restrict the freedom of residence and movement, the former operates under a legal obligation tied to the protection status, whereas the latter appears to be implemented through administrative discretion without a clear legal framework. This lack of transparency and legal basis, particularly for deconcentration, raises concerns about arbitrariness and disproportionality. Both policies have disproportionately negative effects on vulnerable groups, especially when individuals are transferred to provinces where they lack community ties, access to services, or safety — as is often the case for LGBTIQ+ individuals or those with specific medical or protection needs. Furthermore, for Syrians under temporary protection, many of the restrictions stem not from primary legislation but from the Temporary Protection Regulation, raising additional questions about the legality and human rights implications of these practices.

In 2024, the procedures varied from one city to another.²⁸⁰ While the PDMM accepts applications, it refers them to province of residences, considering factors such as the residence of family members. Recently, applicants were not referred to the cities where crossing into the EU could happen.²⁸¹ In Istanbul,²⁸² accessing the application process is challenging, and referrals to other provinces are sometimes done verbally without providing any official document. In some cases, applicants are only given a small piece of notepaper with a date written on it, without any explanation, names, stamps, or signatures to make it an official document. According to stakeholders, in 2024, the Istanbul PDMM began asking individuals who wish to apply for international protection whether they are willing to be referred to provinces located along the Iranian border. This practice has had a discouraging effect, particularly on Iranian and Afghan applicants.²⁸³ While there has been slight improvement over 2023, only a few cases with serious vulnerabilities, such as severe health issues or disabilities, were successfully registered in Istanbul in 2024. Some of the PDMMs²⁸⁴ requires a rental contract for registration, yet undocumented individuals face fines for renting, creating a paradoxical barrier. In Izmir, applications are rarely accepted except for very vulnerable cases, with applicants directed to provinces like Afyon, Uşak, and Manisa. However, in 2024, officials at the Manisa PDMM stated that they would not accept international protection applications without written documentation. In Uşak, applicants were required to submit notarized rental agreements. As they were unable to provide such documents—having arrived in the province as irregular migrants—they encountered shops selling fake, ready-made rental agreements specifically for use at PDMM offices.²⁸⁵ In Van, registration is difficult to access but unlikely to the other provinces it is possible especially thanks to the effort of NGO workers and interview appointments are scheduled far in the future. Similar to other provinces, in Ağrı access to registration was nearly impossible due to the capacity issues, five migration officers were handling approximately one thousand cases. Ağrı Bar Association and PDMM have established effective communication over the past year; however, personal interviews are not conducted promptly making the application impossible.²⁸⁶ Gaziantep is closed for registration, but Adana and Malatya frequently serve as referral cities. Previously, LGBTIQ+ individuals were referred to certain cities, such as Eskişehir, Yalova, Isparta, and Denizli, in 2024, stakeholders observed that even when LGBTI+ applicants are able to complete the registration process, they are often officially referred from the province where they initially applied to provinces such as Afyon or Uşak, where they are likely to face discrimination.²⁸⁷ Following a change in management, Mersin is no longer considered a favourable destination for registration. In contrast, in Aksaray and Bilecik, registrations have been possible in some cases thanks to the efforts of NGO workers who were able to persuade the authorities. In some PDMM offices, there is a misconception that only those who arrive irregularly can apply for international protection.²⁸⁸ This creates difficulties for individuals who previously held any type of residence permit and now need protection due to changes in their home countries, as well as for those under alternatives to detention. In contrast, since individuals who enter Türkiye irregularly are often apprehended and issued deportation orders, those subjected to alternatives to detention—mainly holders of the T6 document—sometimes face difficulties when attempting

²⁸⁰ Information provided by stakeholders, March, April and May 2025.

²⁸¹ Information provided by stakeholders, March – April 2024.

²⁸² Information provided by stakeholders, March – April 2024.

²⁸³ Information provided by stakeholders, May 2025

²⁸⁴ Information provided by stakeholders, March – April 2024.

²⁸⁵ Information provided by a stakeholder in April 2024

²⁸⁶ Information provided by a stakeholder, May 2023.

²⁸⁷ Information provided by a stakeholder, April 2025

²⁸⁸ Information provided by stakeholders, March – April 2024.

to apply for international protection. Some PDMM offices take the position that a deportation order which has not been legally challenged prevents an individual from applying for international protection, although this is not stipulated in the LFIP. Given the high number of apprehensions, in 2024, individuals with unchallenged deportation orders increasingly refrained from lodging international protection applications out of concern that they would be rejected or ignored. This concern is not unfounded. On 2 May 2024, a lawyer accompanied her client to the Çankırı PDMM to support their application for international protection. After submitting their petition, they were made to wait for several hours. When the lawyer inquired about the delay, an official responded that the application would not be accepted and that the police had been called. It was later revealed that the applicant had a deportation order which had not been appealed and had been released from a Removal Center with a T6 document. Although the lawyer argued that this did not constitute a legal barrier to applying for international protection, officials insisted that the application could only be submitted from within a Removal Center. Thanks to the lawyer's intervention, the application was ultimately accepted, but the applicant was immediately transferred to a Removal Center.²⁸⁹

People in precarious circumstances isolated themselves and did not leave their homes to avoid police and deportation. When they did so, their foreign identification numbers were deactivated, preventing them from accessing services such as healthcare and education. There were also issues when individuals travelled to other provinces without permission from PDMM. People could not afford to live in the province where they were registered, so they moved to larger cities.²⁹⁰ Unauthorised departure from the province of registration without a valid excuse and travel permit results in the application for international protection is deemed withdrawn, and in judicial appeals against withdrawal decisions, economic reasons are frequently not regarded as a legitimate excuse.²⁹¹ (See: Travelling outside the "province of residence" and sanctions)

When authorities in the PDMM believe that a person fled to Türkiye for economic or medical reasons, they typically adopt a negative stance towards them. In addition, PDMM practices constantly change and even lawyers sometimes have trouble accessing the PDMM premises. The director of the Şanlıurfa PDMM was accused of bribery and corruption, according to an investigative journalism report. After the news became visible, the director lost his position and was transferred to Muş PDMM.²⁹²

The Izmir Bar Association's Migration and Asylum Commission highlighted various issues and rights violations faced by foreigners and lawyers during and after international protection applications in their report. The report²⁹³ pointed out legal irregularities and inconsistencies across different provinces, including: applications not being registered, lawyers and applicants being made to wait for long hours, lack of suitable waiting areas leading to adverse physical conditions for lawyers and vulnerable applicants, applicants being deprived of basic human rights such as education and healthcare due to not being issued international protection applicant IDs.

In 2024, 9,009 individuals applied for international protection,²⁹⁴ a significant decrease when compared to the registrations in previous year (19,017 applications) potentially due to the above-mentioned difficulties, earthquakes, and deepened economic crisis. Based on this specific statistic, stakeholders emphasized that the figures are difficult to interpret, as the need for registration persists.²⁹⁵

The EU launched a project in April 2022 to be implemented during three years called 'Reinforce Effectiveness of National Asylum Procedures in Compliance with International Standards and National Legislation' in Türkiye under the Instrument for Pre-Accession Assistance (IPA II) to support the asylum-seeking processes.²⁹⁶ The expected outcomes are to strengthen and maintain the effectiveness of the

²⁸⁹ T24, [Uluslararası koruma başvurusu yapmak için göç idaresine gitti, alıkonuldu](#), 02.05.2025

²⁹⁰ Information provided by various stakeholders, May-June 2023

²⁹¹ For further analysis, see; Gamze Ovacık, *Turkish Judicial Practices on International Protection, Removal and Administrative Detention in Connection with the Safe Third Country Concept* (On İki Levha Publications 2021) 112-120.

²⁹² Gazete Duvar, 'Şanlıurfa İl Göç İdaresi'nde neler oluyor?', 11 July 2022, available in Turkish [here](#).

²⁹³ Uluslararası Koruma Başvurusu Sırasında Yabancıların ve Avukatların Yaşadığı Sorunlar ve Yaşanan Hak İhlalleri İle İlgili Rapor Hazırlandı, available [here](#).

²⁹⁴ PMM, Statistics, 2024, available [here](#)

²⁹⁵ Information provided by a stakeholder, April 2025.

²⁹⁶ PMM, 1 April 2022, 'Ulusal İltica Prosedürlerinin Etkinliğinin Kuvvetlendirilmesine İlişkin Projenin Açılış Toplantısı Gerçekleştirildi', available in Turkish [here](#) & UNHRC, 31.03.2022, Press Release: Reinforce

procedures, to establish quality assurance for an effective and sustainable system in the procedures through the relevant principles and standards developed, to take measures to reduce vulnerability to abuses, including fraud, and to strengthen and maintain the effectiveness of resettlement procedures. The project has been supporting the PMM quality assurance board to ensure uniformity of treatment for applications in 81 cities.²⁹⁷

3.2. Applications from detention and at the border

Where an application for international protection is presented to law enforcement agencies on the territory or at the border²⁹⁸, the PDMM shall be notified “at once” and shall process the application.²⁹⁹ Applications for international protection indicated by persons in detention shall also be notified to the PDMM “at once”.³⁰⁰ In addition to Removal Centres for pre-removal detention on territory, there is one facility in the transit zone of **Ankara Esenboğa Airport**, which serves to detain persons intercepted in transit or during an attempt to enter Türkiye (see [Place of Detention](#)).

Persons whose international protection application are received whilst in detention are released from the Removal Centre or police station and are issued an Administrative Surveillance Decision Form (*İdari Gözetim Kararı Sonlandırma Tebliğ Formu*), also known as “T6”. This form requires them to regularly report to a designated PDMM which may or may not be the PDMM of their province of residence (see [Alternatives to Detention](#)).³⁰¹ Due to the decreasing number of registrations and the increasing number of apprehensions, the T6 document has become the most widespread form issued to newcomers. According to stakeholders, a significant number of applicants mistakenly believe that the T6 is an official identification card issued by the Turkish authorities. While there is no formal connection between the T6 document and the international protection registration process, applicants often attempt—and NGOs frequently advise them—to seek registration in the province indicated on the T6, where they are required to report for signature duty.³⁰²

Despite the legal safeguards provided by the LFIP to secure access to the asylum procedure, people in Removal Centres continue to encounter some difficulties in having their applications for international protection registered by the PDMM,³⁰³ access to asylum and legal assistance is problematic. In certain centres, there have been testimonies of mandatory signing of return forms, leading to significant rights violations.³⁰⁴ Asylum seekers lack clear information about the procedures being applied to them while they are in the centres. In some Removal Centers, officials reportedly refuse to accept international protection applications on the grounds that submitting an application while under administrative detention would have negative consequences for the applicant. As such applications must be processed under the accelerated procedure—often resulting in rejection—officials decline to register the application while presenting this refusal as an act in the applicant’s best interest. In some cases where the application is accepted within the Removal Center, applicants are later released without receiving any information regarding the status or outcome of their international protection claim.³⁰⁵ In İzmir (**Harmandalı RC**), document registration numbers

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²⁹⁷ Ministry of Foreign Affairs, ‘Ulusal Sığınma Prosedürlerinin Etkinliğinin Uluslararası Standartlar ve Ulusal Mevzuata Uygun Olarak Kuvvetlendirilmesi’, 14 October 2022, available in Turkish [here](#)

²⁹⁸ In Türkiye, while National Police exercises law enforcement duties in residential areas and at border gates, the gendarmerie exercises police duties outside the residential areas.

²⁹⁹ Article 65(2) LFIP.

³⁰⁰ Article 65(5) LFIP.

³⁰¹ Information provided by a stakeholder, February 2019.

³⁰² Information provided by a stakeholder, May 2025

³⁰³ Information provided by multiple stakeholders, May 2023.

³⁰⁴ Information provided by multiple stakeholders, March – April 2024.

³⁰⁵ Information provided by a stakeholder May 2025

are not provided for applications, which makes it very difficult to follow the cases; in **Van (Kurubaş RC)**, applications are registered however, according to stakeholders, most applicants who submit international protection claims at the Kurubaş Removal Center are referred to Harran Temporary Accommodation Center (TAC) for further processing. If they are not transferred to Harran and their application is subsequently rejected, they are less likely to be referred to a western province with a T6 document, as their international protection file remains active in Van. This situation discourages many applicants from applying initiating an application for international protection or from appealing a rejection decision, since their primary intention is often to continue their journey toward western Türkiye and ultimately, Europe. In the removal centres of İstanbul, it is nearly impossible to access to registration.³⁰⁶

According to a stakeholder, in 2025, a status determination interview was conducted inside a Removal Center in İstanbul. Reportedly, the officials responsible for conducting the interview were connected to the RC remotely via an online platform.³⁰⁷

Access to the procedure from detention also concerns persons readmitted by Türkiye. Whereas Article 64 RFIP entrusts the Ministry of Interior with the establishment of a separate framework of procedures for persons readmitted by Türkiye pursuant to readmission agreements, there has not been any such instrument regulating the access of readmitted persons to the international protection procedure to date. In the context of the implementation of the EU-Türkiye statement between 4 April 2016 and 31 January 2020, Türkiye readmitted a total of 2,054 persons from **Greece**, of whom 738 originated from Pakistan, 373 from Syria, 204 from Algeria, 140 from Afghanistan, 127 from Iraq and 104 from Bangladesh.³⁰⁸ PMM has established a specific code, “V89” entitled “Greece – return”, but stakeholders have not referred to this being used in practice. Readmission operations were stopped as of 16 March 2020 and Türkiye was still not accepting readmissions as of the end of 2023³⁰⁹ (See the [AIDA Country Report: Greece 2023](#)). As of June 2025, the number of Syrians readmitted by Türkiye is 412.³¹⁰ Türkiye’s unilateral suspension of the return of irregular migrants from the Greek islands on public health grounds, which began in March 2020, continues.³¹¹

Reports on the post-return human rights situation of Syrians document serious human rights violations such as arbitrary detention and deportation without access to legal aid and international protection (see also [Legal Assistance for Review of Detention](#)).³¹²

C. Procedures

1. Regular procedure

1.1. General (scope, time limits)

Indicators: Regular Procedure: General

- | | |
|--|---|
| 1. Time limit set in law for the determining authority to make a decision on the asylum application at first instance: | 6 months |
| 2. Are detailed reasons for the rejection at first instance of an asylum application shared with the applicant in writing? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. Backlog of pending cases at first instance as of 31 December 2023: | Not available |

³⁰⁶ Information provided by multiple stakeholders, April 2025.

³⁰⁷ Information provided by a stakeholder, May 2025.

³⁰⁸ UNHCR, *Returns from Greece to Türkiye*, 31 January 2020, available [here](#).

³⁰⁹ International Rescue Committee, ‘What is the EU-Türkiye deal?’, 18 March 2021, available [here](#).

³¹⁰ Information provided by a stakeholder, June 2023.

³¹¹ European Commission, COMMISSION STAFF WORKING DOCUMENT, Türkiye 2024 Report, 30.10.2024, available [here](#)

³¹² Daily News, ‘Greek forces pushback dozens of Syrian refugees into Turkey’, 31 May 2022, available [here](#).

Applications for international protection shall be examined and decided upon by PMM.³¹³ “Migration experts” from the Department of International Protection oversee the processing of applications at Headquarters and the PDMM.

The interviews shall be held within 30 days after registration and decision shall be issued within 6 months from registration.³¹⁴ However, this is not a binding time limit, as the law states that in case an application cannot be decided within 6 months the applicant will be notified. In practice, severe delays are observed in the completion of the international protection procedure, against the backdrop of capacity shortages at the PDMM. Applicants may wait for years, sometimes for 5 to 8 years,³¹⁵ for a decision to be taken on their application.³¹⁶ Even if their IDs should not be confiscated before a definitive rejection decision, this is done in practice, leading to significant difficulties in accessing rights.³¹⁷

Although the application process is lengthy, rejection responses sometimes come faster, especially for single men. Rejections often result from insufficient information and documentation, failure to meet the burden of proof, or inadequate supporting evidence.³¹⁸ In 2023, rejections increased significantly. Information about acceptance rates or decision-making times is lacking. In 2024, 85,125, and in 2023, 94,506 decisions were taken by PMM. These figures significantly exceeded the annual target of 50,000 decisions set for each year. However, the breakdown of positive and negative decisions has not been made publicly available.³¹⁹

IP applications of people holding International Protection status from UNHCR and living in Türkiye for 10 years and 12 years were kept on shelves but as of 2021, it was observed that PMM had been rejecting those applications in mass. Stakeholders believe that PDMM’s staff does not have the capacity to deal with workload required for international protection applications. For the last 3-4 years, international protection applications have been taken off the shelves and negative decisions have been made.³²⁰ According to a stakeholder, the Provincial Directorates of Migration Management (PDMMs) conduct interviews and assessments within a short timeframe—typically two to three months—due to the deployment of expert teams from the Presidency of Migration Management (PMM) who carry out the interviews. For instance, in Istanbul, at least 25 decisions were issued between December 2024 and February 2025, a notably high number compared to the rest of the year. These were predominantly rejection decisions. Similarly, in Van, at least 30 rejection decisions were issued between June and August 2024.³²¹ There are some cases of international protection applicants who have been living in Türkiye for 8-10 years, receive rejections.

According to stakeholders, some applicants feel profoundly devastated after receiving a rejection decision following nearly a decade of residing in Türkiye, during which they built their lives and raised their children in the country.³²²

Overall, practice on the examination and the decision-making at first instance is not uniform across provinces.³²³ The quality of interviews, the assessment of evidence, the challenges of identification of vulnerable groups, the lack of available interpreters in certain languages have been reported as particular concerns. For the application process to continue smoothly, more personnel and translators are needed, but there is a lack of capacity³²⁴. There are too many pending international protection files, authorities are working to fasten the decision process after registration and decrease the waiting time for the decision.³²⁵

³¹³ Article 78 LFIP.

³¹⁴ Article 78(1) LFIP.

³¹⁵ KAOS GL, 10 şehirden avukatlar, mülteci LGBTİ+’ların hakları için buluştu, 6.12.2023, available [here](#).

³¹⁶ Information provided by various stakeholders, May-June 2023.

³¹⁷ Information shared by a stakeholder, March 2024.

³¹⁸ Information shared by stakeholders, March – April 2024.

³¹⁹ PMM, Faaliyet Raporu 2024.

³²⁰ Information provided by stakeholders, May-June 2023 & Information provided by stakeholders, March - April 2024.

³²¹ Information provided by multiple stakeholders, April May 2025.

³²² Information provided by a stakeholder, May 2025.

³²³ Information provided by stakeholders, March - April 2024.

³²⁴ Ibid.

³²⁵ Ibid.

UNHCR provides support to PMM in terms of country-of-origin information and capacity, aiming to contribute to the quality of decisions³²⁶.

1.2. Prioritised examination and fast-track processing

Persons with special needs shall be “given priority with respect to all rights and proceedings” pertaining to the adjudication of international protection applications.³²⁷ In practice, despite the severe obstacles to **Registration**, persons with special needs such as women in advanced stages of pregnancy, persons with acute health needs, or unaccompanied children have benefitted from prioritisation in the registration of international protection applications at the PDMM.³²⁸ The number of people with special needs was 85,138 in 2024. The number of interviews conducted with potential trafficking victims was 8,251, with 179 victims of human trafficking identified in 2024.³²⁹

1.3. Personal interview

Indicators: Regular Procedure: Personal Interview

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the regular procedure? Yes No
 - ❖ If so, are interpreters available in practice, for interviews? Yes No
2. In the regular procedure, is the interview conducted by the authority responsible for taking the decision? Yes No
3. Are interviews conducted through video conferencing? Frequently Rarely Never
4. Can the asylum seeker request the interviewer and the interpreter to be of a specific gender? Yes No
 - ❖ If so, is this applied in practice, for interviews? Yes No

Under the regular procedure, the competent PDMM is required to carry out a personal interview with applicants within 30 days from registration,³³⁰ to be conducted by personnel trained in fields such as refugee law, human rights and country of origin information.³³¹

Applicants are notified of the assigned place and date of their personal interview at the end of their **Registration** interview.³³² If the interview cannot be held on the assigned date, a new interview date must be issued.³³³ The postponed interview date must be no earlier than 10 days after the previous appointment date. Additional interviews may be held with the applicant if deemed necessary.³³⁴ In practice, however, applicants face significant delays, often up to several months, before a first interview.

The applicant may be accompanied in the interview by: (a) family members; (b) their lawyer as an observer; (c) an interpreter; (ç) a psychologist, pedagogue, child expert or social worker; and (d) the legal representative where the applicant is a child.³³⁵

There are two decision centres located in **Istanbul** and **Ankara**. There are 8 mobile decision teams located in Ankara, Eskisehir, Sakarya, Denizli, Mersin, Samsun, Sivas, and Izmir, with around 60 staff members,

³²⁶

Ibid.

³²⁷

Article 67 LFIP.

³²⁸

Information provided by a stakeholder, February 2019 & Information provided by stakeholders, March - April 2024.

³²⁹

PMM, Faaliyet Raporu 2024, available [here](#).

³³⁰

Article 75(1) LFIP.

³³¹

Article 81(2) RFIP.

³³²

Article 69(5) LFIP.

³³³

Article 75(4) LFIP.

³³⁴

Article 75(5) LFIP.

³³⁵

Article 82(1) RFIP.

including psychologists, and sociologists³³⁶. The mobile teams are providing support to other cities for refugee status determination, especially for difficult cases and for interpretation support. PMM aims to expand the number and capacity of decision centres in eight provinces, with the objective of assessing international protection applications regionally through trained experts.³³⁷ To improve the decision processes, trainings are organised for PMM staff, and random file-checking are conducted. One of the priorities of PMM in 2024, is fast and efficient procedures³³⁸. Accordingly, when a stakeholder questioned the disproportion between the number of rejection decisions and positive status grants, an official from a PDMM office explained that while they are free to issue rejection decisions independently, they must obtain approval from the Presidency of Migration Management (PMM) to grant a positive decision.³³⁹

Although there are some positive efforts, practice is still not uniform across provinces and the quality of the procedure depends on the case officer handling the application.³⁴⁰ According to civil society and lawyers, however, the quality of interviews remains low in most PDMM. In **Ağrı**, a person who worked in Afghanistan for an international organisation and sought international protection was denied international protection. The applicant then appealed against this decision. According to the Erzurum 1st Administrative Court, PDMM should have conducted a more effective personal interview. PDMM abided by the decision and invited the applicant for a second personal interview. Her lawyer was present during the interview, and she was granted international protection.³⁴¹

Overall, in 2024 stakeholders reported that refugee status determination interviews were often not carried out under proper conditions, vulnerabilities were often not considered and Afghans' applications (especially single men) for international protection seemed to be rejected by default and single male applicants are often subjected to manipulative questioning aimed at portraying them as economic migrants. For example, an Afghan applicant who identified as a member of the Hazara ethnic minority was asked only about his willingness to work, while no questions were raised regarding his ethnic background or potential risk of persecution.³⁴² According to a stakeholder, during an interview at the Kırıkkale PDMM in 2024, a 10-minute break was agreed upon to allow the applicant and their lawyer to have breakfast. When they returned after 12 minutes, they saw that the official had already started to report their absence. The official stated that he assumed they would not return. Had the report been completed, the applicant would have been deemed to have abandoned the interview, potentially jeopardizing the outcome of the application.³⁴³

Interviews do not depend on credible country of origin information. Since 2022, some progresses were reported regarding interviews with LGBTIQ+ and HIV+ individuals. The UNHCR provided intensive trainings to PMM's protection officers, which led to this improvement. However, the method for rejecting applications and the legal justifications for rejected decisions were deemed rather superficial.³⁴⁴ In 2024, it is known that during interviews with LGBTIQ+ refugees, unnecessary and sometimes psychologically abusive questions are asked to determine if individuals were indeed LGBTIQ+.³⁴⁵ Notably, questions involving violence are often omitted from the interview forms. According to a stakeholder, the international protection application of an Iranian lesbian woman was rejected despite her clearly stating during the interview that she had identified as a lesbian since the age of 14 and had had relationships with women. She also explained that she had been sentenced to lashing in Iran for being caught kissing another woman. However, the application was rejected on the grounds that she did not provide sufficient information about the societal challenges she faced as a lesbian.³⁴⁶

³³⁶ Information provided by a stakeholder, March 2024.

³³⁷ PMM, Faaliyet Raporu; PMM Stratejik Plan 2024-2028.

³³⁸ PMM, Faaliyet Raporu.

³³⁹ Information provided by a stakeholder, April 2025.

³⁴⁰ Information provided by various stakeholders, May-June 2023 & March – April 2024.

³⁴¹ Information provided by a stakeholder, May 2023.

³⁴² Information provided by various stakeholders, May 2023 & March- April 2024, April-May 2025.

³⁴³ Information provided by a stakeholder April 2025.

³⁴⁴ Information provided by a stakeholder, June 2023.

³⁴⁵ KAOS GL, 10 şehirden avukatlar, mülteci LGBTİ+'ların hakları için buluştu, 6.12.2023, available [here](#).

³⁴⁶ Information provided by a stakeholder May 2025.

According to stakeholders, some Iranian applicants who face a risk of persecution due to their Christian faith were subjected to highly detailed questioning about the Bible during their interviews. They were even asked to recite specific passages from memory as a way to prove their religious beliefs.³⁴⁷

In some cases, each adult member of the family is interviewed individually. Often in practice, this is not implemented. If the application is done as a family, interviews often are not conducted separately for adult women and men from the same family³⁴⁸. Audio or video records of the interviews may be taken, though in current practice no such audio or video records are used. According to stakeholders, the practice of interviewing only the father in family applications continued in 2024. As a result, if the woman had a distinct claim—such as experiences of gender-based violence in the country of origin or during border crossings—that she did not wish to disclose in the presence of her husband, these claims often went unassessed. Women were not asked whether they preferred to be interviewed separately, which severely limited their ability to present individual protection needs. This is particularly problematic given the cultural context, where women may be discouraged or even stigmatized for speaking up for themselves, especially in the presence of male family members or officials.³⁴⁹

In 2024, all stakeholders reported the biggest obstacle was access to the procedure (see [Registration of the asylum application](#)).

Interpretation

Applicants shall be provided with interpretation services, if they so request, for the purpose of personal interviews carried out at application, registration and personal interview stages.³⁵⁰

Regarding the quality of interpretation during personal interviews, the personal interview shall be postponed to a later date where the interview official identifies that the applicant and the interpreter have difficulties understanding each other.³⁵¹ The interviewer shall inform the interpreter of the scope of the interview and the rules to be complied with.³⁵²

In 2023, no concerns were reported on the adequate numbers of interpreters however there are shortages or a lack of interpreters in specific rare languages spoken by applicants. Moreover, even though gender of the interpreters and the applicants are considered, the number of women interpreters remains low.³⁵³ Lack of sensitivity to and censorship of applicants' statements have also been reported in claims relating to sexual orientation or gender identity.³⁵⁴ Lawyers have expressed concerns about the quality of interpretation in removal centres including in important interviews on return.³⁵⁵ However, as a positive development, the number of interpreters increased.³⁵⁶ Concerns regarding the quality and fairness of interpretation during applicant interviews were raised by stakeholders, as illustrated by the following examples. According to a stakeholder, during the interview of an Afghan applicant in Kırıkkale, although the applicant spoke fluent Turkish, the interview was conducted with a Persian interpreter. When the applicant began explaining parts of their account in Turkish, they were warned by the interpreter. The applicant then requested to continue in Turkish, noting that although Dari and Persian are similar, they are distinct dialects and they did not feel comfortable expressing themselves fully in Persian. However, the interpreter responded that since Persian had been marked as the interview language on the form at the outset, the interview would proceed in that language. The interpreter further stated that if the applicant did not comply, their application could be rejected.³⁵⁷ Another stakeholder reported that during an interview in İzmir, the French interpreter participated remotely and did not have visual contact with the applicant. In addition to concerns regarding the interpreter's level of French, the unstable internet connection caused communication difficulties, requiring the interview to be extended over several days. The lawyer, who has some proficiency in French, was able to follow the interpretation issues. At the end of the interview, she requested to add an annotation noting that the interpretation was problematic due to the unstable

³⁴⁷ Information provided by multiple stakeholders April 2025.

³⁴⁸ Information provided by a stakeholder, March - April 2024.

³⁴⁹ Information provided by a stakeholder May 2025.

³⁵⁰ Article 70(2) LFIP.

³⁵¹ Article 86(2) RFIP.

³⁵² Article 83(3) RFIP.

³⁵³ Information provided by a stakeholder, March – April 2024.

³⁵⁴ Information provided by a stakeholder, May 2022.

³⁵⁵ Information provided by a stakeholder, May 2022.

³⁵⁶ Information provided by various stakeholders, May-June 2023.

³⁵⁷ Information provided by a stakeholder April 2025.

connection. In response, the official stated that although he could assign signature duty on a monthly basis, he preferred to do so weekly—an unrelated remark that raised concerns about the use of discretion in a context that did not warrant it.³⁵⁸

Report

The interviewing official shall use a standard template called “International Protection Interview Form” to record the applicant’s statements during the personal interview. This form is a template consisting of a predefined set of questions that must be presented to the applicant covering basic biographic information, profile indicators, reasons for flight and fear of return, among others.³⁵⁹

The interview official is required to read out the contents of the International Protection Interview Form to the applicant at the end of the interview and ask the applicant whether there are any aspects of the transcript that he or she wants to correct and whether there is any additional information he or she would like to present.³⁶⁰

An interview report shall then be drafted at the end of the interview, and the applicant shall sign it and receive a copy.³⁶¹ In practice, applicants are not given a copy of the interview report.³⁶² Once the application is rejected, the only way to reach this form is to wait for the administration to submit its defence petition to the court. As a result, applicants are often compelled to challenge the decision before the International Protection Evaluation Commission (IPEC) and submit their initial petition to the administrative court without being aware of the grounds for the rejection.

1.4. Appeal

Indicators: Regular Procedure: Appeal		
1. Does the law provide for an appeal against the first instance decision in the regular procedure?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ If yes, is it	<input checked="" type="checkbox"/> Judicial	<input checked="" type="checkbox"/> Administrative
❖ If yes, is it suspensive	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Average processing time for the appeal body to make a decision:	Not available	

Decisions must be communicated in writing.³⁶³ Notifications of negative decisions should lay down the objective reasons and legal grounds of the decision. Where an applicant is not represented by a lawyer, he or she shall also be informed about the legal consequences of the decision and applicable appeal mechanisms. Furthermore, the notification of all decisions within the scope of the LFIP shall give due consideration to the fact that the “persons concerned are foreign nationals” and a separate directive shall be issued by PMM to provide specifics on modalities of written notifications.³⁶⁴ In practice, the decisions are in Turkish but translated by the PDMM into the language of the applicants. Rejection decisions typically indicate only the type or category of the decision, without providing specific reasoning or explaining how the applicant’s situation was assessed to fall within that category.³⁶⁵ There are some concerns about the lack of verbal or written notification and lack of referral to organisations providing support for the appeal.³⁶⁶

The LFIP provides two separate remedies against negative decisions issued in the regular procedure, one optional administrative appeal remedy and one judicial appeal remedy. When faced with a negative status decision by PMM under the regular procedure, applicants may:³⁶⁷

³⁵⁸ Information provided by a stakeholder April 2025

³⁵⁹ Article 81(5) RFIP.

³⁶⁰ Article 86(3) RFIP.

³⁶¹ Article 75(6) LFIP.

³⁶² Information provided by multiple stakeholders, February 2019, March 2021, April 2025.

³⁶³ Article 78(6) LFIP.

³⁶⁴ Article 100 LFIP.

³⁶⁵ Information provided by a stakeholder, May 2023 and May 2025.

³⁶⁶ Information provided by a stakeholder, March – April 2024.

³⁶⁷ Article 80 LFIP.

- File an administrative appeal with the International Protection Evaluation Commissions (IPEC) within 10 days, and file an onward judicial appeal with the competent Administrative Court only if the initial administrative appeal is unsuccessful; or
- Directly file a judicial appeal with the competent Administrative Court within 30 days.

In practice, the latter remedy was applied until last year. In 2024, there were several applications made to IPEC.

Both types of appeals have automatic suspensive effect. Under the LFIP, applicants shall generally be allowed to remain in Türkiye until the full exhaustion of remedies provided by LFIP against negative decisions,³⁶⁸ subject to the derogation discussed in [Removal and Refoulement](#).

In 2024 legal aid offices faced significant challenges in carrying out lawyer assignment processes. In many cases, they refrained from appointing lawyers due to financial constraints. In criminal courts, the compulsory defense mechanism does not function as well. If in theory, when the person is deprived of this right, the court should remind them of their right to have a defense lawyer, some foreign citizens' cases have been settled without the assistance of a lawyer.

Ankara, Istanbul and Izmir Administrative Courts do not accept the assignment letters of legal aid lawyers - they require a power of attorney instead.³⁶⁹ They said that the legal aid assignment letter was only internal correspondence, so the acceptance of the assignment letter was illegal. Lawyers working on refugee rights may have difficulty accessing power of attorney. In one case, the court ruled that the lawyer had worked without a power of attorney, complained to the bar association for disciplinary reasons, and ordered the lawyer to pay the attorney's expenses.³⁷⁰

1.4.1. Administrative appeal before IPEC

Negative decisions in the regular procedure may be appealed at the IPEC within 10 days of the written notification of the decision.³⁷¹

IPEC are envisioned as a specialised administrative appeal body and serve under the coordination of the PMM Headquarters.³⁷² One or more IPEC may be created under the auspices of either the PMM Headquarters and/or PDMM.

Each Committee will be chaired by a PMM representative and will feature a second PMM official as well as representatives of the Ministry of Justice and Ministry of Foreign Affairs. UNHCR may be invited to assign a representative in observer status.³⁷³ PMM personnel assigned to the IPEC will be appointed for a period of 2 years whereas the Ministry of Justice and Ministry of Foreign Affairs representatives will be appointed for one-year term. IPEC are envisioned to serve as full-time specialised asylum tribunals as members will not be assigned any additional duties.³⁷⁴

IPEC are competent to evaluate and decide appeals against the following decisions:³⁷⁵

- Negative status decisions issued in the regular procedure;
- Other negative decisions on applicants and international protection status holders, not pertaining to international protection status matters as such;
- [Cessation](#) or [Withdrawal](#) of status decisions.

On the other hand, decisions on administrative detention, inadmissibility decisions and decisions in the accelerated procedure are outside the competence of IPEC.

³⁶⁸ Article 80(1)(e) LFIP.

³⁶⁹ Information provided by stakeholders, March – April 2024.

³⁷⁰ Information provided by a stakeholder, March 2024.

³⁷¹ Article 80(1)(a) LFIP.

³⁷² Article 134 RFIP.

³⁷³ Article 145 RFIP.

³⁷⁴ Article 146 and 147 RFIP.

³⁷⁵ Article 149 RFIP.

IPEC review the initial PMM decision on both facts and law.³⁷⁶ The Commission may request the full case file from PMM if deemed necessary. IPEC are authorised to interview applicants if they deem necessary or instruct the competent PDMM to hold an additional interview with the applicant.

Whereas the LFIP does not lay down a time limit for the finalisation of appeals filed with IPEC, Article 100(3) RFIP provides that the Commission shall decide on the appeal application and notify the applicant within 15 days of receiving the application, which may be extended by 5 more days.

IPEC do not have the authority to directly overturn PMM decisions. The Commission may either reject the appeal - and thereby endorse the initial PMM decision -, or it may request PMM to reconsider its initial decision in terms of facts and law.³⁷⁷ Therefore, decisions by IPEC cannot be considered as binding on PMM. If PMM chooses to stick to its initial negative decision, the applicant will have to file a consequent judicial appeal with the competent Administrative Court.

As problems with access to legal aid services became widespread across various bar associations, in 2024 many applicants began to pursue the appeal procedure through the International Protection Evaluation Commission (IPEC). This process only requires submitting a simple petition to an administrative body, rather than initiating a case before a judicial authority. In 2025, PDMMs in provinces such as İstanbul and İzmir began renewing the ID cards of applicants who had submitted appeals to IPEC, adding a handwritten note stating that the applicant is "under appeal procedure" (*itiraz sürecinde*). As this is a very recent practice, some applicants reportedly encountered difficulties during routine ID checks by law enforcement officers, who were unfamiliar with this annotation.

A stakeholder highlighted a specific issue related to legal time limits. Since applications are submitted to an administrative body—rather than a judicial one—applicants who attempted to file on the final day of the deadline sometimes encountered problems when officials miscalculated the applicable time frame and initially refused to accept the application. This issue was particularly evident in cases where the deadline coincided with a public holiday, despite the applicant's legal right to submit the application on the next working day.³⁷⁸

1.4.2. Judicial appeal at the Administrative Court

Negative decisions in the regular procedure may also be directly appealed at the competent Administrative Courts within 30 days of the written notification of the decision.³⁷⁹ There is no requirement for applicants to first exhaust the IPEC step before they file a judicial appeal against a negative decision. However, if they choose to file an administrative appeal with IPEC first, depending on the outcome of the IPEC appeal, they can appeal a negative IPEC decision onward at the Administrative Court.

Under Turkish law, Administrative Court challenges must be filed in the area where the act or decision in question was taken.³⁸⁰

While the LFIP has not created specialised asylum and immigration courts, Türkiye's High Council of Judges and Prosecutors shall determine which Administrative Court chamber in any given local jurisdiction shall be responsible for appeals brought on administrative acts and decisions within the scope of the LFIP.³⁸¹ In 2015, the Council passed a decision to designate the 1st Chamber of each Administrative Court as responsible for appeals against decisions within the scope of LFIP. These competent chambers continue

³⁷⁶ Article 100(1) RFIP.

³⁷⁷ Article 100(2) RFIP.

³⁷⁸ Information provided by a stakeholder May 2025.

³⁷⁹ Article 80(1)(ç) LFIP.

³⁸⁰ In Türkiye, not all provinces have Administrative Courts in location. Smaller provinces which do not have an Administrative Court in location are attended by courts operating under the auspices of the nearest Administrative Court. The Administrative Court of each province is divided into several chambers which are designated with numbers.

³⁸¹ Article 101 LFIP.

to deal with all types of caseloads and do not exclusively serve as asylum and immigration appeal bodies. The previous concerns about the quality of decisions persisted and deepened in 2024.³⁸²

There are no time limits imposed on Administrative Courts to decide on appeals against negative decisions in the regular procedure. Administrative Court applications are normally adjudicated in a written procedure. In theory, an applicant can request a hearing, which may or may not be granted by the competent court.

Administrative Courts are mandated to review the PDMM decision on both facts and law. If the application is successful, the judgment annuls the PDMM decision but does not overturn it as such. According to administrative law, the first instance authority is obligated to either revise the challenged act or decision or appeal the Administrative Court decision to the Council of State (*Danıştay*) within 30 days.³⁸³

The evidence threshold set by administrative courts has remained excessively high, thereby reducing applicants' chances of obtaining a favourable ruling on their appeals for international protection registration. Moreover, the onward appeal has been ineffective for a long time.³⁸⁴

The rate of positive decisions in cases filed appealing international protection refusal is very low. There are inconsistencies and the quality of court decisions can vary from province to province and from court to court in the same province. The different decisions are made about two applicants in similar situations³⁸⁵. Some judges have little legal/practical knowledge of international protection procedures. Sometimes they request a briefing from PDMM about the country of origin to decide, since most judges do not speak English, they cannot access the country-of-origin information.³⁸⁶ Mülteci-der produced country of origin reports³⁸⁷ and published the translation of ECtHR judgements into Turkish³⁸⁸ within the scope of the "Rights in Administrative Detention" project carried out with the financial support of the European Union.

Case law of the Administrative Courts confirms that there are persisting gaps in the quality of first instance decisions. The Administrative Courts of **Ankara**, **İstanbul**, **İzmir** and **Van** are regarded as the most expert courts in refugee law issues. These courts often diligently examine whether the negative decisions on international protection applications are in line with the *non-refoulement* principle and have annulled decisions based on an incorrect assessment on the part of the PMM. According to stakeholders, this trend did not persist. Instead, the experienced administrative courts in these four provinces began to be influenced by the decisions issued by newer courts in other provinces, which were perceived as having less judicial expertise. This shift was unexpected, as it had been anticipated that the more established courts would contribute to setting higher jurisprudential standards, rather than aligning with less consistent or lower-quality precedents.³⁸⁹

In May 2025, five different administrative courts in Istanbul—the 1st, 15th, 16th, 17th, and 18th—were designated to handle cases under the LFIP. This fragmentation has negatively affected the consistency of case law even within a single province. However, there have been less favourable attitudes to foreign citizens in judicial decisions and is probably linked to rising xenophobia and anti-refugee discourse in the country.³⁹⁰

In a legal aid case involving an African applicant's appeal case on international protection, the lawyer requested the appointment of an interpreter through the legal aid budget. However, her request was denied, and the judge ordered the applicant to find an interpreter and pay the fees out of his own pocket.³⁹¹ The Erzurum 1st Administrative Court has rare positive decisions, one of its decisions involved an Afghan applicant who was a prosecutor in Afghanistan who applied for international protection but it was denied by PDMM. He filed an appeal with the Erzurum 1st Administrative Court. The court ruled in favour of the applicant, concluding he could not be deported to Afghanistan due to the risk of persecution he would

³⁸² ECRE AIDA Database, 'Türkiye: Judicial Review of Administrative Detention Decisions', 28 May 2018, available [here](#). Information provided by stakeholders, March – April 2024.

³⁸³ Article 28 Law on Administrative Court Procedures.

³⁸⁴ Information provided by a stakeholder, April 2023 & information provided by stakeholders, March – April 2024.

³⁸⁵ Information provided by stakeholders, March – April 2024.

³⁸⁶ Information from a stakeholder, May 2022.

³⁸⁷ Mülteci-der, Menşe Ülke Bilgi Notları, available [here](#).

³⁸⁸ Mülteci-der, AİHM Kararları, available [here](#)

³⁸⁹ Information provided multiple stakeholders March 2025.

³⁹⁰ Information provided by stakeholder, 2023 & Information provided by stakeholders, March - April 2024.

³⁹¹ Information provided by a stakeholder, May 2023.

face.³⁹² In early 2025, an administrative court annulled the negative international protection decision issued to an Iranian national who claimed to face prosecution and a risk of persecution in Iran due to their Christian faith.³⁹³

1.4.3. Onward appeal before the Regional Administrative Court and the Council of State

Applicants have the possibility of filing an onward appeal with the Regional Administrative Court and then the Council of State within 30 days.³⁹⁴ There is no time limit for the Regional Administrative Court and the Council of State to decide on the application. The Council of State decision on the onward appeal will constitute the final decision on the application since it cannot be further appealed. According to stakeholders, it is impossible to obtain a positive outcome from the Regional Administrative Court if the first instance court has already rejected the appeal against an international protection rejection decision.³⁹⁵ It is difficult to establish the exact number of refused and accepted decisions from the Regional Administrative Court and the Council of State.

1.5. Legal assistance

Indicators: Regular Procedure: Legal Assistance

1. Do asylum seekers have access to free legal assistance at first instance in practice?
 Yes With difficulty No
❖ Does free legal assistance cover:
 Representation in interview
 Legal advice
2. Do asylum seekers have access to free legal assistance on appeal against a negative decision in practice?
 Yes With difficulty No
❖ Does free legal assistance cover
 Representation in courts
 Legal advice

All applicants for and beneficiaries of international protection have a right to be represented by an attorney in relation to “all acts and decisions within the scope of the International Protection section of the LFIP”, under the condition that they pay for the lawyer’s fees themselves.³⁹⁶

In principle, a notarised power of attorney is required for a lawyer to represent the asylum seeker,³⁹⁷ unless the applicant benefits from the Legal Aid Service, in which case the appointment letter is deemed sufficient to represent the applicant.

As per the Union of Notaries Circular 2016/3 of 2 March 2016, the International Protection Applicant Identification Card is included in the list of documents accepted by public notaries. Still, the power of attorney requirement entails additional financial costs, which vary depending on location, and poses substantial obstacles to applicants in detention.

The Ombudsman Institution has issued a recommendation stating that no fees should be charged for power of attorney arranged at a notary if a request for legal aid is accepted. In its decision dated 30 May 2023, numbered 2023/6520-S.23.10734³⁹⁸, the Ombudsman Institution reviewed the request to annul the Turkish Notaries Association's Circular No. 2022/10 and to issue a new circular mandating that no fees be collected for attorney powers of attorney at the notary when legal aid is granted by the court. The Ombudsman Institution published this recommendation on its official website, advising the Turkish Notaries Association to reassess the matter under current legislation. Emphasising the state's duty to remove political, economic, and social barriers to the right to a fair trial, as outlined in the Constitution and the European Convention

³⁹² Information provided by a stakeholder, May 2023.

³⁹³ T.C. Kayseri 1. İdare Mahkemesi, 2024/1597 E., 2025/229 K., 24.01.2025.

³⁹⁴ Article 28 Law on Administrative Court Procedures.

³⁹⁵ Information provided by multiple stakeholders April and May 2025

³⁹⁶ Article 81(1) LFIP.

³⁹⁷ On this point, see Constitutional Court, Decision 2015/87, 8 October 2015, available in Turkish [here](#).

³⁹⁸ X Avukat Hakları Grubu Ankara, 11.09.2023, available [here](#).

on Human Rights, the Ombudsman Institution also referenced the Supreme Court’s ruling recognising notaries as institutions of trust.

1.5.1. Legal assistance at first instance

Lawyers and legal representatives can accompany applicants during the personal interview.³⁹⁹ Furthermore, lawyers and legal representatives are guaranteed access to all documents in the file and may obtain copies, with the exception of documents pertaining to national security, protection of public order and prevention of crime.⁴⁰⁰ International protection applicants and status holders are also free to seek counselling services provided by NGOs.⁴⁰¹

These safeguards, however, are inscribed as “freedoms” as opposed to “entitlements” that would create a positive obligation on the state to secure the actual supply and provision of legal counselling, assistance and representation services. In some cases, not necessarily linked to the international protection procedure, PMM has prohibited lawyers from providing oral counselling to clients in the absence of a power of attorney.

The actual supply of free of charge and quality legal assistance to asylum seekers in Türkiye remains limited mainly due to practical obstacles. That said, the Project “Strengthening the Capacity of Bar Associations and Lawyers on European Human Rights Standards” which was co-financed by the European Union, and the Council of Europe, provided trainings, study visits, and other capacity building activities to contribute to the effective implementation of European human rights standards in Türkiye and to strengthen the capacities of Turkish bar associations and lawyers in the implementation of these standards.⁴⁰²

Through a partnership between UNHCR and the Union of Turkish Bar Associations (UTBA), legal clinics in Gaziantep, Şanlıurfa, Hatay, Kilis, Malatya, and recently Van, provide legal assistance and counselling to refugees and asylum seekers. These services cover civil law, exit and re-enter procedures, detention, access to rights, family reunification, reissuing of identity cards, queries related to resettlement and civil law, and consumer and rent laws. The clinics assisted numerous individuals and held outreach activities, including sessions on access to justice and the rights of unaccompanied children, and focused on marriage and divorce for Syrian women. In 2024, 9,914 individuals benefited from the legal clinics and 2,453 individuals reached through outreach activities of legal clinics. 4,593 legal aid appointments submitted for coverage under UNHCR-UTBA partnership.⁴⁰³ As most deportation decisions are based on LFIP for public security, public health, and links to terrorist organisations, most deportation cases do not fall within this project’s scope.

UNHCR and the Union of Turkish Bar Associations (UTBA) also continued their collaboration through the Legal Aid Joint Project, which supports the provision of legal aid services by selected bar associations. In 2024, 57 bar associations— including Adana, Ankara, Antalya, Aydın, Adıyaman, Balıkesir, Bursa, Çanakkale, Çankırı, Çorum, Denizli, Edirne, Erzurum, Eskişehir, Elazığ, Gaziantep, Hatay, Iğdır, İstanbul, İzmir, Kahramanmaraş, Kayseri, Kırklareli, Kilis, Kocaeli, Konya, Kütahya, Malatya, Manisa, Mardin, Mersin, Muğla, Niğde, Osmaniye, Sakarya, Samsun, Sivas, Şanlıurfa, Şırnak, Isparta, Tekirdağ, Trabzon, Van, Yalova, Ağrı, Batman, and Tokat — were included in the project.

Although the project is designed to act as a subsidiary support mechanism, complementing the existing legal aid services of bar associations, stakeholders reported that in 2024, the majority of participating bar associations refrained from appointing lawyers using their own financial resources once the project was active. Instead, they relied primarily on the project’s funding and only made independent appointments in exceptional cases, such as those involving gender-based violence against women and children.⁴⁰⁴

Due to budget-related issues,⁴⁰⁵ the UTBA project often halts support during certain months until it is reactivated, causing problems in accessing lawyers. According to stakeholders, in 2024 the project was active between March and May, after which it was paused for several months. It resumed briefly with

³⁹⁹ Article 75(3) LFIP.

⁴⁰⁰ Article 94(2) LFIP.

⁴⁰¹ Article 81(3) LFIP.

⁴⁰² COE, Joint Project on Strengthening the Capacity of Bar Associations and Lawyers on European Human Rights Standards, available [here](#).

⁴⁰³ UNHCR, Legal Assistance Factsheet, January 2025, available [here](#)

⁴⁰⁴ Information provided by multiple stakeholders March, April and May 2025.

⁴⁰⁵ Information provided by stakeholders, March – April 2024.

appointments observed in September and October, before concluding shortly thereafter. In 2025, appointments were reported only in January and February, with no further activity noted as of the end of May. Although the project provides crucial support, bar associations should fund appointments from their own budgets when the project does not cover them. However, the İzmir bar association continue to make appointments even without the project budget. The İzmir Bar Association generally makes appointments first and then charges them to the project if applicable; otherwise, they cover the costs themselves. The provision of legal aid services is at the discretion of each bar association. Inflation-driven increases in lawyer fees have strained bar association budgets, leading to cuts in legal aid services for asylum seekers and refugees. In addition, legal aid budgets are determined according to the number of lawyers and citizens in the province, but non-citizens such as applications for international protection are not considered when the budget is planned. It also results in significantly less budget for legal aid in smaller provinces. Thus, some bar associations face significant budget challenges.⁴⁰⁶

Overall, the project has been considered quite useful and was seen as particularly effective in provinces where refugees are concentrated but cannot afford to pay for legal fees and court costs out of their pockets. Benefits have included an increase in refugees' access to justice and information, as indicated by information materials on display in removal facilities targeted by the project but not in others, which are not project cities. Some concerns were voiced because lawyers were not appointed promptly enough in circumstances that are time-sensitive such as deportation cases. In 2024, as in previous years, the concerns are reported as to whether those who are imposed a security code are allowed to get legal assistance under the scheme.⁴⁰⁷ However, as problems with the legal aid system deepened, attention to whether specific groups—such as those affected by security codes—could receive support diminished, with the overall deterioration affecting all applicant groups.

Requests for legal aid can be issued from an asylum seeker, a third party or a removal centre. Civil society organisations are the main source of referrals for legal aid with direct applications from refugees and migrants but even this group remains low. This has provided the impetus for the legal aid scheme to extend to persons seeking international protection, and in some cases, for bar associations to take additional steps in contributing to refugee protection in Türkiye.⁴⁰⁸ Bar associations allocate cases through an automated system and decide whether they are eligible for legal aid under the project, otherwise it is channelled into their general Legal Aid Scheme (*Adli Yardım*) discussed below.⁴⁰⁹ In addition, not all the cases referred by NGOs are eligible for legal aid.⁴¹⁰ One practical issue concerns asylum seekers who have been issued a security code e.g. “G87” or “G89”, as the aforementioned legal aid project funding does not cover them and it is up to bar associations to cover costs with additional funding, if they can.⁴¹¹

The UTBA project has been providing a telephone interpretation service in four languages (Arabic, Persian, Dari, and French) for court officials and lawyers offering legal help to Syrian and non-Syrian applicants, and this service could be used in Removal Centres where lawyers have a fixed line.⁴¹²

Within the scope of the action of “Fostering Women’s Access to Justice in Türkiye” (KAEP) jointly supported by the European Union and the Council of Europe, a legal literacy training for women who are exposed to gender-based violence was held in Hatay which is the most affected by the earthquake in December 2023. The training aimed to empower women to claim their rights and utilize available support mechanisms, covering issues like gender-based violence, divorce, alimony, and housing rights post-earthquake. Participants were informed about obtaining free legal support through the legal aid system⁴¹³. In 2024, as the effects of the earthquake continued to be felt, the initiative was adapted to address needs that emerged in its aftermath. It supported legal aid offices in eight provinces — Adıyaman, Hatay, Kahramanmaraş, Malatya, Sinop, Tunceli, Bursa, and Bilecik — with a particular focus on cases involving women. As part of the project, the appointed lawyers also received specialized training. The initiative is expected to remain active through the end of 2025.⁴¹⁴ In partnership with the Union of Turkish Bar Associations (UTBA),

⁴⁰⁶ Information provided by stakeholders, March – April 2024.

⁴⁰⁷ Information provided by stakeholders, May 2023 & Information provided by stakeholders, March – April 2024.

⁴⁰⁸ Information provided by a stakeholder, May 2023.

⁴⁰⁹ Information provided by a stakeholder, May 2023.

⁴¹⁰ Information provided by a stakeholder, May 2023.

⁴¹¹ Information provided by various stakeholder, May 2023.

⁴¹² TTBB, Tercüme Destek Hattı, available [here](#).

⁴¹³ CoE, Increasing women’s knowledge of their rights following the earthquakes in Türkiye, December 2023, available [here](#).

⁴¹⁴ Information provided by a stakeholder, March 2025.

UNICEF launched the Legal Empowerment, Aid, and Protection Programme (LEAP). The programme aims to strengthen the paralegal workforce, provide free legal counseling to affected populations in the earthquake zones through mobile units, and offer free legal aid and representation for certain cases involving children through the official legal aid system⁴¹⁵. A mobile legal aid vehicle named "Law" is equipped with rooms and computers for lawyers to meet with children and caregivers⁴¹⁶. Starting in August 2023, the programme seeks to reach over 6,000 beneficiaries.⁴¹⁷ Accordingly, between January and December 2024, 345 children benefitted from free legal aid provided by local Bar Associations with the support of LEAP. This support primarily focused on legal issues arising from the earthquakes, such as custody, paternity, guardianship, civil registration, and protective measures under the Child Protection Law. As part of LEAP's outreach efforts, the Legal Aid on Wheels (LAW-YASA) mobile unit, has provided legal support in five of the most affected provinces — Kahramanmaraş, Malatya, Adyaman, Hatay, and Gaziantep—since May 2024. YASA visited container sites, and central locations, working closely with local actors such as mukhtars and imams, to expand its reach and visibility. As a result, 46 individuals accessed free legal counseling and support, with common issues including divorce, property rights, insurance law, and petition preparation. In 2024, 910 lawyers received specialized training to enhance legal aid and counseling services, equipping them with essential skills in child-friendly legal aid, custody, guardianship, property rights, and PSEA. To further improve coordination and service delivery, 123 non-legal staff were trained to deepen their understanding of child rights and the legal aid provision.⁴¹⁸ According to stakeholders, legal aid appointments supported through the LEAP project were discontinued as of October 2024.⁴¹⁹

According to a stakeholder, the Hatay Bar Association, benefiting from multiple legal aid projects, was able to utilize these resources effectively. Despite the broader economic challenges, the Bar Association managed to appoint a lawyer for nearly every person in need through at least one of the available projects. UNICEF and the Union of Turkish Bar Associations (UTBA) have launched another initiative aimed at enhancing child-friendly legal aid in Türkiye, "Improving the Capacity of Lawyers and Bar Associations on Promotion, Protection and Monitoring of Children's Rights (ÇABA) Project" seeks to bolster the knowledge and skills of lawyers regarding children's rights, ensuring equitable access to justice for children. With a €3.2M funding from the European Union, this three-year project will develop a comprehensive training program for approximately 2,000 lawyers, establish five pilot Child Rights Centres in Adana, Aydın, Batman, Erzurum, and Trabzon, and strengthen the monitoring capabilities of Bar Associations. UNICEF anticipates that these efforts will indirectly benefit at least 100,000 children through improved legal aid services⁴²⁰.

Beyond the involvement of bar associations, several NGOs are providing legal information and assistance service, but they do not have the resources and operational capacity to establish a significant level of field presence throughout the country. Considering the size of the asylum-seeking population and Türkiye's geographical dispersal policy (see Freedom of Movement), asylum seekers in most locations do not have access to specialised legal counselling and assistance services by NGOs at first instance. NGOs providing legal assistance and counselling to asylum seekers include ASAM, Support to Life (STL), International Refugee Rights Association (*Uluslararası Mülteci Hakları Derneği*), Refugee Rights Türkiye (*Mülteci Hakları Merkezi*), Mülteci-Der, MUDEM, Human Resource Development Foundation (HRDF) and Red Umbrella Sexual Health and Human Rights Association among others. In the absence of any dedicated state funds to fund legal assistance services by NGOs to asylum seekers, the limited amount of project-based external funding available to NGO providers, insufficient prioritisation of direct legal service activities in donor programmes and stringent bureaucratic requirements of project-based funding make it very difficult for specialised NGO legal service providers to emerge and prosper. Following funding cuts from PRM and USAID, the capacity of the relevant organisations was significantly reduced. As a result, asylum seekers increasingly lost confidence in NGOs and their ability to provide effective support.

NGOs have a vital role in helping the functioning of the process more generally. The Bar does not have sufficient knowledge to identify the needs of refugees, but NGOs do this on behalf of the Bar Associations.

⁴¹⁵ UNICEF Türkiye Humanitarian Situation Report No.16, 6 February 2023-30 June 2023, available [here](#).

⁴¹⁶ Adana Barosu, TBB-UNICEF İş Birliğinde Yürütülen Proje Kapsamında "Yasa" Adlı Yolda Yardım Servis Aracı TBB'ye Teslim Edildi, April 2024, available [here](#).

⁴¹⁷ UNICEF Türkiye Humanitarian Situation Report No.16, 6 February 2023-30 June 2023, available [here](#).

⁴¹⁸ UNICEF Türkiye Humanitarian Situation Report No. 22 (Year-End) 31 December 2024, available [here](#)

⁴¹⁹ Information provided by multiple stakeholders, March 2025.

⁴²⁰ UNICEF, 09.06.2023. UNICEF and Union of Turkish Bar Associations launch innovative child-friendly legal aid project to promote equal access to justice for all children, available [here](#).

NGOs identify these needs with the help of their translators, protection experts, social workers, and legal advisors and transmit this knowledge to bar associations. In addition, after the Bar Association appoints a lawyer, NGOs, and their in-house lawyers follow up on the case and provide information to the appointed legal aid lawyer throughout the trial process. Some local NGOs, such as AYHED, have established programs to enhance the capacity of lawyers on specific issues affecting marginalized groups. One such initiative is the Adana LGBTI+ Rights Strengthening and Legal Support Network Program.⁴²¹

1.5.2. Legal assistance in judicial appeals

Persons who do not have the financial means to pay a lawyer are to be referred to the state-funded Legal Aid Scheme (*Adli Yardım*) for judicial appeals in the international protection procedure.⁴²² The LFIP simply refers to the existing Legal Aid Scheme which in theory should be accessible to all economically disadvantaged persons in Türkiye, including foreign nationals.

The Legal Aid Scheme is implemented by the bar associations in each province subject to “means” and “merits” criteria, at the discretion of each bar association board. The assessment of “means” varies across bar associations.

One practical impediment to more active involvement by bar associations is the overall scarcity of legal aid funding made available to bar associations from the state budget. While technically all types of “lawyer services” fall within the scope of legal aid as per Türkiye’s Law on Attorneys, in practice the Legal Aid Scheme in Türkiye provides free legal representation to beneficiaries in relation with judicial proceedings as distinct from legal counselling and consultancy services short of court proceedings. This is indeed a principle reaffirmed by Article 81(2) LFIP, which provides that international protection applicants may seek state-funded legal aid in connection with judicial appeals pertaining to any acts and decisions within the international protection procedure. The suspension of the UTBA project in May – September 2024 in several cities had a direct impact on refugee legal aid services.⁴²³

The costs associated with bringing a case before an Administrative Court in Türkiye include notary fees for the power of attorney, sanctioned translations of identity documents, court application and other judicial fees and postal fees. Since the Legal Aid Scheme only covers a modest attorney fee, applicants are required to cover these costs from their own resources. Although it is possible to request a waiver of these costs from the court, judges have wide discretion on whether to grant such exemptions and in some cases decline the request without providing any substantial reason.⁴²⁴ In a decision dated 30 May 2023, the Ombudsman Institution has issued a recommendation that no fee should be charged for power of attorney documents arranged at notaries when legal aid requests are accepted.

The level of financial compensation afforded to lawyers within the state-funded Legal Aid Scheme is modest and is typically aimed at attracting young lawyers at the early stages of their professional careers. The payments to legal aid lawyers are made on the basis of the type of legal action undertaken as opposed to hours spent on the case. As a result, there are insufficient incentives for legal aid lawyers to dedicate generous amounts of time and effort to asylum cases. That said, the aforementioned legal aid project implemented by UNHCR and the Union of Turkish Bar Associations provides targeted funding to 45 bar associations for international and temporary protection-related cases.

2. Dublin

The Dublin III Regulation does not apply in Türkiye.

⁴²¹ AYHED, Adana LGBTI+ Hakları Güçlendirilmesi ve Hukuki Destek Ağı Programı, 26.09.2024, available [here](#)

⁴²² Article 81(2) LFIP.

⁴²³ Information provided by stakeholders, April 2023 and March – April 2024.

⁴²⁴ The Council of State ruled in one case that the right to request waiver of the costs should be reminded and examined by the Administrative Court in each case: Decision No 2016/1830, 31 March 2016.

3. Admissibility procedure

3.1. General (scope, criteria, time limits)

According to Article 72(1) LFIP, there are 4 grounds on which an application may be considered inadmissible:

- (a) A **Subsequent Application** where “the applicant submitted the same claim without presenting any new elements”;
- (b) An application submitted by a person, who was previously processed as a family member and signed a waiver to give up on their right to make a personal application, where the person submits a personal application: (i) either after the rejection of the original application, without presenting any additional elements; or (ii) or at any stage during the processing of the original application, without presenting any justifiable reason;
- (c) An application by a person who arrived in Türkiye from a **First Country of Asylum**;
- (ç) An application by a person who arrived in Türkiye from a **Safe Third Country**.

An inadmissibility decision can be taken “at any stage in the procedure” where the inadmissibility criteria are identified.⁴²⁵ However, the examination of inadmissibility criteria under Article 72 LFIP must be carried out by the PDMM during the **Registration** stage.⁴²⁶

Depending on the outcome of the inadmissibility assessment by the PDMM,

- ❖ If an applicant is considered to fall into criteria listed in (a) or (b) above, the PDMM will issue the inadmissibility decision and notify the PMM Headquarters within 24 hours, however, there is no time limit for the finalisation of the inadmissibility assessment by the PDMM;
- ❖ If an applicant is considered to fall into criteria listed in (c) or (ç) above, the PDMM will refer the file to the PMM Headquarters, which will finalise the inadmissibility determination and may or may not issue an inadmissibility decision. There is no time limit for the referrals to the PMM Headquarters and the finalisation of the inadmissibility determination.

Inadmissibility decisions must be communicated to the applicant in writing.⁴²⁷ There is no available data on the application of the admissibility procedure.

3.2. Personal interview

Indicators: Admissibility Procedure: Personal Interview

Same as regular procedure

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the admissibility procedure? Yes No
 - ❖ If so, are questions limited to identity, nationality, travel route? Yes No
 - ❖ If so, are interpreters available in practice, for interviews? Yes No
2. Are interviews conducted through video conferencing? Frequently Rarely Never

Article 74(1) RFIP requires the PDMM to conduct an interview with the applicant prior to taking an inadmissibility decision.

⁴²⁵ Article 72(2) LFIP; Article 74(3) RFIP.

⁴²⁶ Article 73 RFIP.

⁴²⁷ Article 72(3) LFIP.

3.3. Appeal

Indicators: Admissibility Procedure: Appeal

Same as regular procedure

1. Does the law provide for an appeal against an inadmissibility decision?
- | | | |
|----------------------------|--|---|
| ❖ If yes, is it | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ❖ If yes, is it suspensive | <input checked="" type="checkbox"/> Judicial | <input type="checkbox"/> Administrative |
| No | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> |

Inadmissibility decisions can only be appealed before the competent Administrative Court.⁴²⁸ Such decisions must be appealed within 15 days of the written notification of the decision, as opposed to 30 days in the [Regular Procedure: Appeal](#).⁴²⁹ The application to the Administrative Court carries automatic suspensive effect.

The 15-day time limit for appealing inadmissibility decisions was contested before the Constitutional Court as unconstitutional, on the basis that it was disproportionate in view of applicants' inability to obtain legal assistance in these cases ([Admissibility Procedure: Legal Assistance](#)). The Court found Article 80(1)(ç) LFIP to be compatible with the Turkish Constitution, holding that the rules on inadmissibility are not complex to such an extent as to prohibit applicants from challenging a negative decision in person within the 15-day deadline.⁴³⁰

3.4 Legal assistance

Indicators: Admissibility Procedure: Legal Assistance

Same as regular procedure

1. Do asylum seekers have access to free legal assistance at first instance in practice?
- | | | | |
|-------------------------------------|--|--|--|
| | <input type="checkbox"/> Yes | <input type="checkbox"/> With difficulty | <input checked="" type="checkbox"/> No |
| ❖ Does free legal assistance cover: | <input type="checkbox"/> Representation in interview | | |
| | <input type="checkbox"/> Legal advice | | |
2. Do asylum seekers have access to free legal assistance on appeal against an inadmissibility decision in practice?
- | | | | |
|------------------------------------|--|---|-----------------------------|
| | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> With difficulty | <input type="checkbox"/> No |
| ❖ Does free legal assistance cover | <input checked="" type="checkbox"/> Representation in courts | | |
| | <input checked="" type="checkbox"/> Legal advice | | |

The rules and practice set out in [Regular Procedure: Legal Assistance](#) apply. However, applicants whose claims are dismissed as inadmissible face obstacles in accessing legal representation for lodging an appeal given that they are not issued an International Protection Application Identification Card on the basis of which power of attorney may be granted. Access to legal assistance is exacerbated by the shorter deadline of 15 days to lodge an appeal against an inadmissibility decision, compared to 30 days in the regular procedure.

4. Border procedure (border and transit zones)

The LFIP does not lay down a specific border procedure as such although the RFIP mentions that PDMM shall be promptly notified of applications made at the border.⁴³¹

Applications made after the border crossing are subject to the general rules laid down by the LFIP. However, in relation to applications made before the border crossing, in the transit area of an airport or after the person has been refused entry at the border, the competent PDMM shall be notified by the border

⁴²⁸ Article 80(1)(a) LFIP.

⁴²⁹ Article 80(1)(ç) LFIP.

⁴³⁰ Constitutional Court, Decision 2016/134, 14 July 2016, available in Turkish [here](#).

⁴³¹ Article 67(1) RFIP.

authorities and brought in to handle the application. Designated officials from the PDMM “are to determine, as first matter of business”, whether the application should be subject to the [Accelerated Procedure](#).⁴³²

Facilities where persons apprehended without valid documentation are held exist in **İstanbul** Airport, **İstanbul** Sabiha Gökçen Airport, **Ankara** Esenboğa Airport and **İzmir** Adnan Menderes Airport. The main airport in **İstanbul** is now İstanbul Airport. Additionally in the airports in Antalya, Muğla (Dalaman and Milas) there are such facilities. The application procedure had improved but became more difficult in the recent years (see [Access at the airport](#)).

5. Accelerated procedure

5.1. General (scope, grounds for accelerated procedure, time limits)

Article 79(1) LFIP lays down 7 grounds for referring an application to the accelerated procedure, where the applicant:

- (a) Has not raised any issues pertinent to international protection when lodging an application;
- (b) Has misled the authorities by presenting false documents or misleading information and documents, or by withholding information or documents that would have a negative impact on the decision;
- (c) Has destroyed or disposed of their identity or travel document in bad faith in an attempt to prevent determination of their identity or nationality;
- (ç) Has made an international protection application after being detained for the purpose of removal;
- (d) Has applied for international protection solely for the purpose of preventing or postponing the execution of a removal decision;
- (e) Poses a danger to public order or security, or has previously been deported from Türkiye on these grounds;
- (f) Files a [Subsequent Application](#) after his previous application was considered implicitly withdrawn.

The examination of accelerated procedure criteria under Article 79 LFIP must be carried out by the PDMM during the [Registration](#) stage.⁴³³

In the handling of applications processed under the accelerated procedure, the personal interview shall take place within 3 days of the application, and the decision shall be issued within 5 days of the personal interview.⁴³⁴ Where this time limit cannot be complied with, the applicant may be taken off the accelerated procedure and referred to the regular procedure.⁴³⁵

As discussed in [Detention of Asylum Seekers](#), Article 68 LFIP allows for the administrative detention of international protection applicants during the processing of their claim for up to 30 days. Technically, an applicant subject to the accelerated procedure may or may not be detained depending on the competent PDMM’s interpretation of the applicant’s circumstances against the detention grounds.

The accelerated procedure is applied in practice, for example in the case of persons detained in Removal Centres, although statistics are not publicly available.⁴³⁶ According to NGOs and lawyers in the field, applications subject to accelerated procedures generally respect the time limits set out in the law. However, decisions have been taken without respecting the 8-day time limit.⁴³⁷

⁴³² Ibid.

⁴³³ Article 73 RFIP.

⁴³⁴ Article 79(2) LFIP.

⁴³⁵ Article 79(3) LFIP; Article 80(3) RFIP.

⁴³⁶ Information provided by UNHCR, February 2019.

⁴³⁷ Information provided by a stakeholder, May 2023.

5.2. Personal interview

Indicators: Accelerated Procedure: Personal Interview

Same as regular procedure

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the accelerated procedure? Yes No
 - ❖ If so, are questions limited to nationality, identity, travel route? Yes No
 - ❖ If so, are interpreters available in practice, for interviews? Yes No
2. Are interviews conducted through video conferencing? Frequently Rarely Never

Article 80(2) RFIP provides that the accelerated procedure “shall not prevent the application to be assessed in detail”. However, the assessment is not thorough and detailed in practice. Personal interviews of international protection applicants in Removal Centres are conducted by the Removal Centre officers and generally take 5-10 minutes.⁴³⁸ Similar observations have been reported for interviews at the airport: cases of interviewers likely to ‘manipulate’ the applicant’s statements and try to conclude economic needs as the reason for their entry into Türkiye have been reported.

5.3. Appeal

Indicators: Accelerated Procedure: Appeal

Same as regular procedure

1. Does the law provide for an appeal against the decision in the accelerated procedure?
 - Yes No
 - ❖ If yes, is it Judicial Administrative
 - ❖ If yes, is it suspensive Yes No

There are several significant differences between appeals in the regular procedure and appeals in the accelerated procedure. Negative decisions under the accelerated procedure must be directly appealed at the competent Administrative Court. The application to the administrative court carries automatic suspensive effect.

Unlike in the [Regular Procedure: Appeal](#), the court must decide on the appeal within 15 days in appeals originating from the accelerated procedure. The decision by the Administrative Court is final. It cannot be appealed before a higher court.

Administrative Courts have examined cases in the accelerated procedure, in some cases annulling the first instance decision. According to stakeholders, in recent years there have been several cases where international protection applications were incorrectly assessed under the accelerated procedure, despite requiring examination under the regular procedure. In such instances, administrative courts have often addressed the issue from a procedural standpoint, without evaluating the substance of the applicant’s claims, and have annulled the decisions accordingly. For example, in 2024, the Denizli 1st Administrative Court annulled a rejection decision issued under the accelerated procedure for an Iranian national, stating that the application could not be considered as made “solely for the purpose of preventing or postponing the execution of a removal decision.” The court did not examine the applicant’s underlying reasons for seeking protection.⁴³⁹

Stakeholders also reported a recent practice of rejecting international protection applicants who have remained in applicant status for extended periods, such as 7 to 10 years. These rejections, often issued under the accelerated procedure, have also been dismissed by administrative courts. According to stakeholders, this approach appears to be an attempt to limit applicants’ access to legal remedies by

⁴³⁸ Information provided by a stakeholder, May 2022.

⁴³⁹ T.C. Denizli 1. İdare Mahkemesi 2022/2617 E., 2024/532 K., 29.03.2024 T.

circumventing standard procedural guarantees. For instance, in April 2025, an Afghan national who had been an applicant since 2020 was issued a rejection decision under the accelerated procedure by the Çanakkale PDMM. Similarly, in December 2024, Kütahya PDMM issued accelerated procedure rejections to two long-term applicants: an Iraqi national who had been in the procedure since 2015, and an Afghan national with an application pending since 2016. All three cases are currently under judicial review⁴⁴⁰.

According to the strategic plan of PMM, it is aimed to ensure the effective implementation of the accelerated procedure mechanism.⁴⁴¹

5.4. Legal assistance

Indicators: Accelerated Procedure: Legal Assistance

Same as regular procedure

1. Do asylum seekers have access to free legal assistance at first instance in practice?
 - Yes With difficulty No
 - ❖ Does free legal assistance cover:
 - Representation in interview
 - Legal advice

2. Do asylum seekers have access to free legal assistance on appeal against a negative decision in practice?
 - Yes With difficulty No
 - ❖ Does free legal assistance cover
 - Representation in courts
 - Legal advice

The same rules as in the [Regular Procedure: Legal Assistance](#) apply. For an overview of difficulties encountered by applicants subject to accelerated procedure in detention when trying to access legal assistance services, see the section [Legal Assistance for Review of Detention](#). In the past, applicants in the accelerated procedure were not issued an International Protection Applicant Identification Card and their ability to issue a power of attorney was severely limited. However, after changes to Article 76(2) LFIP in December 2019, they can be now receiving an identity document. The Administrative Court requires a power of attorney to be presented within 10 days; otherwise, it considers the appeal inadmissible.⁴⁴²

D. Guarantees for vulnerable groups

1. Identification

Indicators: Identification

1. Is there a specific identification mechanism in place to systematically identify vulnerable asylum seekers?
 - Yes For certain categories No
 - ❖ If for certain categories, specify which:

2. Does the law provide for an identification mechanism for unaccompanied children?
 - Yes No

According to the law, the “persons with special needs” category includes “unaccompanied minors, handicapped persons, elderly, pregnant women, single parents with minor children, victims of torture, rape and other forms of psychological, physical or sexual violence.”⁴⁴³

Neither the LFIP nor the RFIP includes LGBTIQ+ persons in the list of categories of “persons with special needs”. In the past, problems regarding the way applicants are interviewed about issues pertaining to sexual orientation and gender identity were reported. These ranged from inappropriate terminology or

⁴⁴⁰ Information provided by a stakeholder May 2025.

⁴⁴¹ PMM, Stratejik Plan 2024-2028.

⁴⁴² Information provided by several stakeholders, May 2023.

⁴⁴³ Article 3(1)(I) LFIP.

offensive questions to verbal abuse during registration interviews. However, in 2022, stakeholders reported that protection offices and migration officers were well trained by UNHCR and they were significantly more professional. Reportedly, the practice of requesting a medical report from LGBTIQ+ applicants proving their sexual orientation or gender identity for resettlement or protection interviews has been largely discontinued.⁴⁴⁴ The regulation concerning alternatives to administrative detention refers to individuals identified by UNHCR as members of "fragile groups" under the category of vulnerable persons. According to stakeholders, this designation is understood to include LGBTI+ individuals (see: [Alternatives to Detention](#)). However, there were court decisions from the Bursa 1st Regional Administrative Court based on two separate deportation decisions issued by the Bursa and Yalova PDMMs requiring Iranian LGBTIQ+ applicants to submit a medical report to prove that they should not be deported. There is no precise definition of the court's use of medical reports.⁴⁴⁵ In 2024, requesting any proofs indicating their membership to any LGBTIQ+ association, photos with LGBTIQ+ flag or any other supportive documents continue.⁴⁴⁶ In total, 85,138 persons with special needs were identified in 2024 by PDMMs.⁴⁴⁷

1.1. Screening of vulnerability

RFIP states that it "shall be primarily determined" whether the applicant is a person with special needs.⁴⁴⁸ The PDMM are required to make an assessment during registration whether the applicant belongs in one of the categories of "persons with special needs", and to make a note in the applicant's registration form if he or she has been identified as such. An applicant may also be identified as a "person with special needs" later on in the procedure.⁴⁴⁹

According to the law, PMM may cooperate with relevant public institutions, international organisations and NGOs for the treatment of persons subjected to torture or serious violence.⁴⁵⁰

No official mechanism for the identification of vulnerabilities in the asylum procedure has been established to date. Under the previous Registration system, the joint registration interview conducted by UNHCR / SGDD-ASAM enabled the detection of specific needs of the applicant, which were then taken into consideration *inter alia* in the assignment of a "satellite city" in close coordination with the PMM Headquarters (see Freedom of Movement). Following the transition to exclusive registration by PMM, it is still not clear how the PDMM assess special needs in practice.⁴⁵¹ Nevertheless, UNHCR still refers vulnerable cases to the PDMM to prioritise registration.

According to stakeholders, in 2024, individuals from vulnerable groups were more readily identified by PDMM offices, particularly after completing the registration process. When these individuals raised concerns related to their specific vulnerabilities, the protection desks at PDMM offices generally provided support or, at the very least, ensured that their voices were heard.

1.2. Age assessment of unaccompanied children

While the LFIP does not contain any provisions on age assessment, the RFIP provides guidance regarding the role of age assessment in the identification of unaccompanied children applicants. The Regulation states that where the applicant claims to be of minor age, but does not possess any identity documents indicating their age, the governorates shall conduct a "comprehensive age determination" consisting of a physical and psychological assessment.⁴⁵² The applicant shall be notified as to the reason of this referral and the age assessment proceedings that will be undertaken.⁴⁵³

⁴⁴⁴ Information provided by a stakeholder, March 2024.

⁴⁴⁵ Information provided by a stakeholder, June 2023.

⁴⁴⁶ Information provided by a stakeholder, March 2024.

⁴⁴⁷ PMM 2023 Annual Report, available [here](#).

⁴⁴⁸ Article 113(1) RFIP.

⁴⁴⁹ Article 113(2) RFIP.

⁴⁵⁰ Article 113(3) RFIP.

⁴⁵¹ Information provided by various stakeholders, May-June 2023.

⁴⁵² Article 123(2)(b) RFIP.

⁴⁵³ Article 123(2)(c) RFIP.

If the age assessment exercise indicates without a doubt that the applicant is 18 years of age or older, he or she shall be treated as an adult. If the age assessment fails to establish conclusively whether the applicant is above or below 18 years of age, the applicant's reported age shall be accepted to be true.

While neither the LFIP nor the RFIP make any provisions regarding the methods to be used in age assessment examinations on international protection applicants, according to the guidelines of the State Agency for Forensic Medicine, for the purpose of age assessment examinations, physical examination and radiography data of the person (including of elbows, wrists, hands, shoulders, pelvis and teeth) are listed as primary sources of evaluation. No reference is made to any psychosocial assessment of the person. Also, according to the (then) Ministry of Family and Social Services' 2015 Directive on unaccompanied children, the PDMM issue a medical report on the physical condition of the children before placing them in Ministry premises.⁴⁵⁴

In practice, bone tests are applied to assess the age of unaccompanied children referred to the Ministry of Family and Social Services to be taken into care. The accuracy of tests on the jawbone can range between +2/-2 years older or younger. If a test result indicates a child is aged 16 - give or take two years -, the authorities still tend to interpret the assessment at the upper threshold.⁴⁵⁵

However, since it is not possible for unaccompanied minors to be accepted to childcare institutions affiliated to the Ministry of Family and Social Services (MoFSS) before the age determination process is completed, children may be accommodated in places such as police stations and removal centres in conditions incompatible with the best interests of the child during this period.⁴⁵⁶ On the other hand, it is reported that the MoFSS and the PMM are discussing about establishing a Migration First Reception Unit where unaccompanied child can stay until the age assessment is determined.⁴⁵⁷ In 2024, no such practice was observed; according to stakeholders, it was by far the most challenging year in securing official recognition of unaccompanied minors by the authorities.⁴⁵⁸

Besides, it is reported that in most provinces, both the MoFSP and the PDMM defer applications for identifying and protecting unaccompanied asylum-seeking children to the child police, claiming they are not responsible. These children then face unlawful and arbitrary practices, with various rights violations occurring throughout the identification process. Despite legislation limiting age tests to cases where age is uncertain and not documentable, in practice, nearly all unaccompanied asylum-seeking children are subjected to age tests by the child police, even those with valid age documents.⁴⁵⁹

Unaccompanied minors in Türkiye face several problems, primarily due to the common practice of registering them as adults. If minors lack age documentation, they undergo age assessments, often based on inaccurate "bone tests." Even with original documents proving their age, minors may still be undergoing the age assessment procedure. These assessments frequently overlook psychological and sociological evaluations, leading to erroneous age estimates, especially for those close to turning 18. Moreover, age assessment decisions are challenging to appeal, as minors often do not receive written decisions. Being registered as adults leads to severe consequences, including detention and deportation orders, complicating their ability to apply for protection.⁴⁶⁰

When children are caught attempting to illegally leave the country, the ID from their country of origin or the ID they are provided with while in Türkiye is used to determine their age. If the child has no documentation, officials assign the child an age according to the child's appearance and behavior. If the child is not sure of their age or says they are 17, they get documented as 18. Majority of African children are often recorded as 18, even at the age of 16, as they reportedly look more mature. In these cases, they are wrongly taken into administrative detention.

⁴⁵⁴ Article 6 Ministry of Family and Social Services Directive No 152065 on Unaccompanied Children.

⁴⁵⁵ Information provided by a stakeholder, May 2023 and March 2024.

⁴⁵⁶ Mülteci Hakları Merkezi, Türkiye'deki Refakatsiz Sığınmacı Çocukların Hukuksal Korumaya Erişimi: Tespitler ve Değerlendirmeler, September 2022, available [here](#).

⁴⁵⁷ Türkiye Cumhuriyeti Aile ve Sosyal Hizmetler Bakanlığı 2023 Yılı Faaliyet Raporu, available [here](#).

⁴⁵⁸ Information provided by a stakeholder, April 2025

⁴⁵⁹ Mülteci Hakları Merkezi, Türkiye'deki Refakatsiz Sığınmacı Çocukların Hukuksal Korumaya Erişimi: Tespitler ve Değerlendirmeler, September 2022, available [here](#).

⁴⁶⁰ Medico International, 2023, What safety are they talking about?" Why Turkey cannot be considered a 'safe third country'— an expert opinion.

It can be very difficult to know whether a child is in a removal centre or not as this information is not shared with NGOs due to the KVKK (Personal Data Protection Act).

Refugee Rights Türkiye offers additional services for minors and ex-minors by phone. It is possible to access the line in Turkish, English, French and Arabic.⁴⁶¹

According to stakeholders, unaccompanied children are no longer being screened to the same extent as in previous years, particularly by NGOs or legal actors. This decline may be attributed to deteriorating conditions, as well as a growing sense of disillusionment with the Turkish system. As a result, many individuals either view Türkiye solely as a transit country or choose not to come at all. Currently, the majority of unaccompanied minors identified are Afghan boys, typically aged 16 or older.⁴⁶²

2. Special procedural guarantees

Indicators: Special Procedural Guarantees

1. Are there special procedural arrangements/guarantees for vulnerable people? Yes For certain categories No
- ❖ If for certain categories, specify which:

2.1. Adequate support during the interview

The LFIP contains several special provisions for “persons with special needs” including unaccompanied children. However, with the exception of unaccompanied children, the law falls short of providing comprehensive additional procedural safeguards to vulnerable categories of international protection applicants.

During the personal interview, where persons with special needs are concerned, the applicant’s sensitive condition shall be taken into account.⁴⁶³ However, no specific guidance is provided in either the LFIP or the RFIP as to whether the applicant’s preference on the gender of the interpreter should be taken into consideration or not. In 2024, it is stated that the preference on gender of the interpreter was taken into consideration⁴⁶⁴. In previous years, LGBTQI+ refugees reported that they were subjected to verbal abuse by some officers and other refugees in PDMM, and that they were mocked because of their sexual orientations and gender identities.

The RFIP instructs that interviews with children shall be conducted by trained personnel, sufficiently informed on the child’s psychological, emotional and physical development.⁴⁶⁵ The decision-making official shall give due regard to the possibility that the child may not have been able to fully substantiate their request for international protection. Furthermore, if a psychologist, a pedagogue or a social worker was arranged to attend the interview, the expert’s written report on the child shall also be taken into consideration. In 2024, stakeholders reported that unaccompanied minors were not being interviewed; instead, they remained in state institutions until the age of 18 after which they were either referred to a PDMM to apply for international protection or transferred to a Removal Center.⁴⁶⁶

2.2. Prioritisation and exemption from special procedures

The law requires “priority” to be given to “persons with special needs” in all procedures, rights and benefits extended to international protection applicants.⁴⁶⁷ Registration interviews with unaccompanied minors and other persons who are unable to report to the designated registration premises in the province may be

⁴⁶¹ Information Portal for Refugees in Turkey, ‘Rights and Procedures for Unaccompanied Minors’, last accessed on 13 July 2023, available [here](#).

⁴⁶² Information provided by a stakeholder, February 2025

⁴⁶³ Article 75(3) LFIP.

⁴⁶⁴ Information provided by a stakeholder, March 2024.

⁴⁶⁵ Article 123(2)(g) RFIP.

⁴⁶⁶ Information provided by a stakeholder, April 2025

⁴⁶⁷ Article 67 LFIP; Article 113(2) RFIP.

carried out in the locations where they are.⁴⁶⁸ It is understood from current practice that PDMM provides priority to unaccompanied children in registration process and personal interviews.

Unaccompanied children are exempted from the [Accelerated Procedure](#) and they may not be detained during the processing of their application, since Article 66 LFIP unambiguously orders that they shall be referred to an appropriate accommodation facility under the authority of the Ministry of Family and Social Services.

No such provisions are made in relation to other categories of vulnerable applicants meaning other vulnerable groups may be subjected to the accelerated procedure.

3. Use of medical reports

Indicators: Use of Medical Reports

1. Does the law provide for the possibility of a medical report in support of the applicant's statements regarding past persecution or serious harm? Yes In some cases No
2. Are medical reports taken into account when assessing the credibility of the applicant's statements? Yes No

Article 69(4) LFIP provides that at the time of registration, the responsible authorities shall request that international protection applicants provide information and documents related to reasons for leaving their country of origin and events that led to the application. This provision can be interpreted as a possibility for the applicant to submit a medical report in support of the application. In addition, there is no provision in the LFIP which bars individuals from presenting documents and information in support of their international protection application at any stage of the determination proceedings.

Current practice does not suggest that applicants in the international protection procedure have relied upon medical reports. There are challenges to be able to obtain such reports due to the difficulties in accessing hospitals without a valid ID given by Turkish authorities.⁴⁶⁹

4. Legal representation of unaccompanied children

Indicators: Unaccompanied Children

1. Does the law provide for the appointment of a representative to all unaccompanied children? Yes No

According to Article 66 LFIP, from the moment an unaccompanied child international protection applicant is identified, the best interests of the child principle must be observed and the relevant provisions of Türkiye's Child Protection Law⁴⁷⁰ must be implemented. The child applicant must be referred to an appropriate accommodation facility under the authority of the Ministry of Family and Social Services. There is still no information on the number of unaccompanied children in Türkiye and a tendency for them not to be taken into the care of state institutions despite the recent amendment.

According to the Turkish Civil Code, all children placed under state care must be assigned a guardian.⁴⁷¹ Specifically, all children who do not benefit from the custody of parents (*velayet*) must be provided guardianship (*vesayet*).⁴⁷² The assignment of guardians is carried out by Peace Courts of Civil Jurisdiction (*Sulh Hukuk Mahkemesi*) and guardianship matters are thereafter overseen by Civil Courts of General Jurisdiction (*Asliye Hukuk Mahkemesi*). A guardian under the Turkish Civil Code should be "an adult competent to fulfil the requirements of the task", not engaged in an "immoral lifestyle" or have "significant conflict of interest or hostility with the child in question". Relatives are to be given priority to be appointed

⁴⁶⁸ Article 65(2) RFIP.

⁴⁶⁹ Information provided by stakeholders, March – April 2024.

⁴⁷⁰ Law No 4395 on Child Protection.

⁴⁷¹ Law No 4721 on the Civil Code.

⁴⁷² Article 404 Civil Code.

as guardians.⁴⁷³ Therefore, as far as the legal requirements, qualified NGO staff, UNHCR staff or Ministry of Family and Social Services staff would qualify to be appointed as guardians for unaccompanied minor asylum seekers.

Guardians are responsible for protecting the personal and material interests of the minors in their responsibility and to represent their interests in legal proceedings.⁴⁷⁴ Although not specifically listed in the provisions, asylum procedures would fall within the mandate of the guardians. As a rule, a guardian is appointed for 2 years, and may be reappointed for additional two terms.⁴⁷⁵ In 2024, unlike in previous years, unaccompanied children rarely had legal guardians appointed. According to stakeholders, child protection institutions often proceeded with legal actions without assigning a guardian. In rare cases, staff members or individuals from the institution's management were appointed as guardians.⁴⁷⁶

A study⁴⁷⁷ grouped the challenges in the legal representation and protection of asylum-seeking unaccompanied children in practice as “(1) disorganization, deficiencies and contradictions in the legislation, (2) difficulty in accessing legal services, (3) ignoring the need for children to be represented as independent individuals within the justice system, and (4) lack of legal expertise for asylum-seeking unaccompanied children”. Both lack of sufficient legal expertise in the field and lack of information shared with the unaccompanied children regarding their rights and the procedures hinders the protection of unaccompanied minors.

It is also reported that although unaccompanied minors have access to legal assistance and representation, other challenges arise. These include a lack of interpreters, insufficient funds, and difficulties reaching legal aid services from removal centres, which are often far from city centres. Common problems include finding lawyers willing to visit removal centres and the overall quality of legal support. While there have been advancements in the specialisation of lawyers in refugee law, the specific competence for assisting unaccompanied asylum-seeking children remains inadequate⁴⁷⁸.

E. Subsequent applications

Indicators: Subsequent Applications

1. Does the law provide for a specific procedure for subsequent applications? Yes No
2. Is a removal order suspended during the examination of a first subsequent application?
 - ❖ At first instance Yes No
 - ❖ At the appeal stage Yes No
3. Is a removal order suspended during the examination of a second, third, subsequent application?
 - ❖ At first instance Yes No
 - ❖ At the appeal stage Yes No

While the LFIP does not provide a specific dedicated procedure for the handling of subsequent applications, reference is made to subsequent applications in the legislative guidance concerning admissibility assessment and accelerated processing considerations.

According to Article 72(1)(a) LFIP, a subsequent application where “the applicant submitted the same claim without presenting any new elements”. In such a case, the PDMM shall issue the inadmissibility decision and notify the PMM Headquarters within 24 hours; however, there is no time limit for taking an inadmissibility decision.

⁴⁷³ Articles 413, 414, 418 Civil Code.

⁴⁷⁴ Articles 445-448 Civil Code.

⁴⁷⁵ Article 456 Civil Code.

⁴⁷⁶ Information provided by a stakeholder, April 2025.

⁴⁷⁷ Süleyman Dost ve Nedime Sevdé Gökez, ‘Sığınmacı Refakatsiz Çocukların Korunması ve Hukuki Temsili’ (2024) 14(1) Süleyman Demirel Üniversitesi Hukuk Fakültesi Dergisi 421, 463.

⁴⁷⁸ Mülteci Hakları Merkezi, Türkiye’deki Refakatsiz Sığınmacı Çocukların Hukuksal Korumaya Erişimi: Tespitler ve Değerlendirmeler, September 2022, available [here](#).

At the same time, Article 79(1)(f) LFIP foresees the application of the accelerated procedure where the applicant “files a subsequent application after his previous application was considered implicitly withdrawn”. Accordingly, if a subsequent application successfully passes the inadmissibility check, it will be treated under the accelerated procedure.

The PDMM is responsible for the initial admissibility assessment on subsequent applications and the subsequent examination of the claim in accelerated procedure. Whereas the inadmissibility decisions are also finalised by the PDMM, status decisions in accelerated procedure will be referred to the PMM Headquarters for finalisation based on the personal interview conducted by the PDMM.

While the law does not provide a definition of “subsequent application”, it is indicated that subsequent applicants, who “submit the same claim without presenting any new elements” shall be considered inadmissible. In the absence of any further legislative guidance, it is up to the discretion of the PDMM in charge of registering the application to determine whether the applicant “has presented any new elements”, which appears as a problematic practice.

The law does not lay down any time limits for lodging a subsequent application or any limitations on how many times a person can lodge a subsequent application. According to stakeholders, once an international protection application is rejected by the Provincial Directorate of Migration Management (PDMM), it is nearly impossible for the applicant to reapply unless a court decision is issued in their favour. Although there have been several attempts to submit subsequent applications, stakeholders report that PDMM offices often refuse to accept such applications at the outset. As a result, there is not sufficient information from practice to indicate how subsequent applications are currently being treated.

In practice, PDMM officials treat individuals differently depending on their case outcomes. Those who receive a positive court ruling against the rejection of their international protection application are handled differently from those whose international protection applications were initially rejected—even after court appeals—but later received a positive decision when challenging their deportation order. In the latter cases, individuals are issued a T8 document; however, their requests to be reinstated as international protection applicants are denied. For example, in one 2024 case, an individual was given a small handwritten note stating, “According to the court decision, they cannot apply for international protection.”⁴⁷⁹

F. The safe country concepts

Indicators: Safe Country Concepts

- | | |
|--|---|
| 1. Does national legislation allow for the use of “safe country of origin” concept? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| ❖ Is there a national list of safe countries of origin? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| ❖ Is the safe country of origin concept used in practice? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. Does national legislation allow for the use of “safe third country” concept? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is the safe third country concept used in practice? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does national legislation allow for the use of “first country of asylum” concept? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Safe country concepts come up in the [Admissibility Procedure](#) in Türkiye’s international protection procedure. The LFIP provides “first country of asylum” and “safe third country” concepts but no “safe country of origin” concept. Where an applicant is identified to have arrived in Türkiye from either a “first country of asylum” or a “safe third country”, an inadmissibility decision will be issued under Article 72 LFIP.

1. First country of asylum

Article 73 LFIP defines “first country of asylum” as a country (a) “in which the applicant was previously recognised as a refugee and that he or she can still avail himself or herself of that protection” or (b) “or

⁴⁷⁹ Information provided by a stakeholder, February 2025.

where he or she can still enjoy sufficient and effective protection including protection against *refoulement*.⁴⁸⁰

Article 76 RFIP provides additional interpretative guidance as to what can be considered “sufficient and effective protection”. The following conditions must apply for an applicant to be considered to avail themselves of “sufficient and effective protection” in a third country:

- (a) There is no risk of well-founded fear of persecution or serious harm for the applicant in the third country concerned;
- (b) There is no risk of onward deportation for the applicant from the third country concerned to another country where he or she will be unable to avail themselves of sufficient and effective protection;
- (c) The third country concerned is a state party to the 1951 Refugee Convention and 1967 Protocol and undertakes practices in compliance with the provisions of the 1951 Convention;
- (ç) The sufficient and effective protection provided by the third country concerned to the applicant shall persist until a durable solution can be found for the applicant.

2. Safe third country

For a country to be considered a “safe third country”, the following conditions must apply:⁴⁸¹

- (a) The lives and freedoms of persons are not in danger on the basis of race, religion, nationality, membership to a particular social group or political opinion;
- (b) The principle of *non-refoulement* of persons to countries, in which they will be subject to torture, inhuman or degrading treatment or punishment, is implemented;
- (c) The applicant has an opportunity to apply for refugee status in the country, and in case he or she is granted refugee status by the country authorities, he or she has the possibility of obtaining protection in compliance with the 1951 Refugee Convention;
- (ç) The applicant does not incur any risk of being subjected to serious harm.”

For a country to be considered a “safe third country” for an applicant, an individual evaluation must be carried out, and due consideration must be given to “whether the existing links between the applicant and the third country are of a nature that would make the applicant’s return to that country reasonable.”⁴⁸²

Article 77(2) RFIP provides additional interpretative guidance as to the interpretation of the “reasonable link” criterion, by requiring at least one of the following conditions to apply:

- (a) The applicant has family members already established in the third country concerned;
- (b) The applicant has previously lived in the third country concerned for purposes such as work, education, long-term settlement;
- (c) The applicant has firm cultural links to the country concerned as demonstrated for example by his or her ability to speak the language of the country at a good level;
- (ç) The applicant has previously been in the country concerned for long term stay purposes as opposed to merely for the purpose of transit.

At present, there is no publicly available information as to whether PMM currently subscribes or will in the future subscribe to a categorical ‘list approach’ in making safe country determinations on international protection applicants. There is no public information of the existence of such a list of safe third countries. However, the LFIP and the RFIP require an individualised assessment as to whether a particular third country can be considered a “safe third country” for a specific applicant. The term “safe third country” is generally misused by Turkish courts to mean a third country (apart from country of origin and Türkiye) that would be safe to send the person, so essentially a safe country of removal that would not violate non-refoulement principle, instead of its correct meaning of the term under international protection procedures as explained above. For detailed information on such case law please see [Section B.2. removal and refoulement](#).

⁴⁸⁰ Article 73 LFIP; Article 75 RFIP. The wording resembles the EU definition in Article 35 recast Asylum Procedures Directive.

⁴⁸¹ Article 74 LFIP. The wording resembles the EU definition in Article 38 recast Asylum Procedures Directive.

⁴⁸² Article 74(3) LFIP.

There are cases court cancelled the deportation order on the grounds that the safe country where the deportation will take place to was not explicitly mentioned in 2024. For example, the Denizli 1st Administrative Court annulled the deportation order of an Iranian national. The order stated that, while there would be a risk in returning the applicant to their country of origin, they could instead be deported to a safe third country. However, the court emphasized that the name of the safe third country was not explicitly identified in the decision.⁴⁸³

G. Information for asylum seekers and access to NGOs and UNHCR

1. Provision of information on the procedure

Indicators: Information on the Procedure

1. Is sufficient information provided to asylum seekers on the procedures, their rights and obligations in practice? Yes With difficulty No
- ❖ Is tailored information provided to unaccompanied children? Yes No

According to Article 70 LFIP, during registration, applicants must be provided information regarding the international protection procedure, appeal mechanisms and time frames, rights and obligations, including the consequences of failure to fulfil obligations or cooperate with authorities. If requested by the applicant, interpretation shall be provided for the purpose of interactions with the applicants at registration and status determination interview stages.

The PMM also operates a hotline service called Foreigners Communication Centre (*Yabancılar İletişim Merkezi*, YİMER), which provides uninterrupted service 24/7 in Turkish, English, Arabic, Persian, Russian, German, and Pashto. The Foreigners Communication Center can answer all questions asked by foreigners about visas, residence permits, international protection, and temporary protection; it also serves as a hotline for identifying victims of human trafficking, victims of migrant smuggling, and foreign nationals during sea rescue operations. According to the YİMER's website, as of May 2025, the hotline had received nearly 25,236,699 calls since it started in 2015. In 2024, the hotline had received 2,935,994 calls.⁴⁸⁴ Additionally, 115 migration "kiosk" devices have been installed in 81 provinces and 7 airports.⁴⁸⁵ The kiosks are expected to assist satisfy information demand by minimising line-ups at PDMM offices and optimising their counselling function.⁴⁸⁶ To date, a total of 21 Migration Advisory Centres have been established in 16 provinces. In the upcoming period, it is planned to increase the number of Migration Advisory Centres. In 2023, the existing Migration Advisory Centres have served 991,708 people, and since their inception, a total of 4,220,586 people have accessed the service. According to PMM, in 2024 the Advisory Center activities were suspended.⁴⁸⁷

In addition, UNHCR has set up a platform ("Help"⁴⁸⁸) which provides information in English, Turkish, Arabic and Farsi. The Platform provides specific information related to the earthquake resources.⁴⁸⁹ The Izmir Municipality has been operating Fellow Citizen Communication Center as from 2023 with the financial support of UNHCR and a Refugee Help Desk providing information to applicants on various issues.⁴⁹⁰ Mainstream NGOs such as SGDD-ASAM, Support to Life, Human Resource Development Foundation (*İnsan Kaynağını Geliştirme Vakfı*, HRDF), YUVA also provides assistance and counselling. Refugee Rights Türkiye has an online portal providing information on registration, legal assistance, access to rights, detention, unaccompanied children etc. in 10 languages.⁴⁹¹

⁴⁸³ T.C. Denizli 1. İdare Mahkemesi, 2024/224 E., 2024/1541 K., 11.09.2024 T.

⁴⁸⁴ YİMER 157 website. Available in Turkish at: <https://yimer.gov.tr/>. & PMM Faaliyet Raporu

⁴⁸⁵ Türkiye Büyük Millet Meclisi İnsan Haklarını İnceleme Komisyonu Göç Ve Uyum Alt Komisyonu Tutanaklar, 5.10.2023, available [here](#).

⁴⁸⁶ IOM, 'IOM and PMM Will Establish 115 Information Kiosks for Migrants Across Turkey', 2022, available [here](#).

⁴⁸⁷ PMM, Faaliyet Raporu, 2024, available [here](#).

⁴⁸⁸ UNHCR Help, available [here](#).

⁴⁸⁹ UNHCR, Earthquake resources, available [here](#).

⁴⁹⁰ UNHCR, EGE BÖLGESİ, 2021 Yılına Genel Bakış.

⁴⁹¹ PMM, 'Announcement', February 2023, available [here](#).

TV Project⁴⁹² aims to provide reliable and easily accessible resource for refugees in Türkiye Implemented by ASAM through its YouTube channel in 7 languages (Turkish, English, Arabic, Farsi, French, Somali and Ukrainian). Through the project, refugees living in Türkiye have been informed about their rights, helping build resilience at different levels in conjunction with their access to protection assistance.

2. Access to NGOs and UNHCR

Indicators: Access to NGOs and UNHCR

1. Do asylum seekers located at the border have effective access to NGOs and UNHCR if they wish so in practice? Yes With difficulty No
2. Do asylum seekers in detention centres have effective access to NGOs and UNHCR if they wish so in practice? Yes With difficulty No
3. Do asylum seekers accommodated in remote locations on the territory (excluding borders) have effective access to NGOs and UNHCR if they wish so in practice? Yes With difficulty No

Article 81(3) LFIP states that international protection applicants and status holders are free to seek counselling services provided by NGOs.

NGOs have been instrumental in providing humanitarian aid and facilitating access to education, employment, and healthcare services to Syrian refugees in Türkiye since 2011. However, the impact and sustainability of intercommunal activities and projects connecting refugees with people or institutions of authority to enhance social cohesion and facilitate refugees' adaptation to the national system have been questioned.⁴⁹³

The UNHCR Counselling Line provides counselling on registration procedures, referrals and existing support mechanisms, specifically resettlement, financial assistance and assistance for persons with specific needs.⁴⁹⁴ Since its launch in July 2019, the UNHCR Türkiye Counselling Line handles about 75,000 calls monthly.⁴⁹⁵ Currently, 50 operators manage these calls in 14 languages, including Arabic, Farsi, English, Turkish, French, Kurdish, and Somali, with additional languages like Pashtu, Urdu, and Russian available upon request.⁴⁹⁶ In 2024, the UNHCR Türkiye Counselling Line received 376,500 calls, most of the people requesting counselling were Syrian nationals, followed by nationals of Afghanistan, Iran and Iraq.⁴⁹⁷

UNHCR uses its digital CwC platforms, including the Help website and Facebook Information Board and WhatsApp Communications Tree, to share information about rights, obligations, and available services in multiple languages for refugees and asylum seekers. By the end of May 2025, the UNHCR Türkiye Information Board on Facebook had more than 107,000 followers. The UNHCR Türkiye Help page surpassed 3 million unique visitors in June 2023 and a section dedicated to earthquake-related information, launched on 8 February, garnered over 75,000 views.⁴⁹⁸

SGDD-ASAM, the largest NGO and implementing partner of UNHCR in Türkiye, as of May 2025 has 28 offices in 20 provinces in Türkiye and provides counselling and information services. Other organisations such as Refugee Rights Türkiye in **İstanbul**, and International Refugee Rights Association in **İstanbul** and Mülteci-Der in **İzmir** have helplines and can be accessed by phone. Refugee Rights Türkiye has separate help desks in Turkish, English, Arabic, Farsi/Dari and French for registration, detention and unaccompanied minors. Refugee Support Centre (*Mülteci Destek Derneği*, MUDEM) has presence in various provinces,

⁴⁹² UNHCR Türkiye Factsheet -September 2023.

⁴⁹³ Özge Zihnioğlu & Müge Dalkıran, 'From social capital to social cohesion: Syrian refugees in Turkey and the role of NGOs as intermediaries', August 2021, available [here](#).

⁴⁹⁴ UNHCR, *Türkiye 2019: Operational Highlights*, 6 March 2020, available [here](#).

⁴⁹⁵ UNHCR, Türkiye Monthly Operational Update, March 2025, available [here](#).

⁴⁹⁶ UNHCR, "On the Frontline", available [here](#).

⁴⁹⁷ UNHCR, UNHCR Counseling Line in Türkiye, 30.01.2025, available [here](#).

⁴⁹⁸ UNHCR Türkiye, Operational Update June 2023.

while HRDF has offices in İstanbul, Kütahya, Eskişehir, Ağrı, Van and Ankara and provides information and psychosocial support. Support to Life and YUVA Association are also mainstream organisations that are very active in the field, having a presence in several cities. International NGOs like CARE and GOAL do have offices in Şanlıurfa, Gaziantep and Adana. Apart from national and international NGOs operating across multiple provinces, there are also local organizations such as the Mimoza Women’s Association. While not specifically targeting refugees, these organizations provide services in provinces where few other actors are present. There are some local refugee-led and diaspora-led organisations that are well connected with their communities, providing information and support. As can be observed, NGOs have significantly reduced their capacities due to funding cuts from PRM and USAID.

Faith-based organisations are also very active in providing assistance to applicants, Türkiye Diyanet Foundation, a state-funded faith agency based in Ankara targets mostly educated young Syrians and provides humanitarian aid, financial assistance and language classes. İnsani Yardım Vakfı is another faith-based organisation active nearly in every province of Türkiye.

There are also NGOs helping vulnerable groups such as Women’s Solidarity Foundation (KADAV) and Foundation for the Support of Women’s Work (KEDV) for women in **İstanbul**, the Foundation for Women’s Solidarity in **Ankara**, Women for Women’s Human Rights (WWHR) and Purple Roof Women’s Shelter Foundation, Kaos GL based in **Ankara** assists LGBTQI+ people, as does Red Umbrella Sexual Health and Human Rights Association, SPOD and Hevi LGBTI+. KRG Project in **İstanbul, İzmir, Mersin, Ankara and Eskişehir** assists people living with HIV, sex workers and LGBTI+ while Red Umbrella Sexual Health and Human Rights Association has set up seven service units in five provinces for LGBTQI+ persons, sex workers and people living with HIV in Türkiye.

Moreover, international protection applicants may also access the International Organisation for Migration (IOM) and NGOs carrying out resettlement-related activities, such as the International Catholic Migration Commission (ICMC) in **İstanbul**.

H. Differential treatment of specific nationalities in the procedure

Indicators: Treatment of Specific Nationalities

1. Are applications from specific nationalities considered manifestly well-founded? Yes No
❖ If yes, specify which:
2. Are applications from specific nationalities considered manifestly unfounded? Yes No
❖ If yes, specify which:

1. Syria

Refugees arriving directly from Syria are subject to a group-based, *prima facie*-type **Temporary Protection** regime in Türkiye. The temporary protection regime currently in place covers Syrian nationals and stateless Palestinians originating from Syria. However, this policy has changed since 6 June 2022. (See **Reception Conditions**). Those coming through a third country, however, are excluded from the temporary protection regime. Although they should be allowed to make an international protection application under the LFIP, in practice they are not allowed to apply and are only granted a short-term visa and then a short-term residence permit. In the case of a Syrian who had previously resided in Türkiye but was forced to leave due to the expiration of his residence permit, he entered Türkiye from Kuwait and applied for temporary protection. His application to PDMM was denied. His attorney successfully appealed this ruling and won the case. PDMM continues to resist issuing the ID to the applicant.⁴⁹⁹

In another case of a Syrian national,⁵⁰⁰ the applicant and their children arrived in Türkiye via Lebanon in January 2021 to reunite with the spouse, who had been living in İstanbul with a temporary protection identity and work permit. The application for temporary protection was denied on the grounds of entering from a

⁴⁹⁹ Information provided by a stakeholder, May 2023.

⁵⁰⁰ İstanbul İdare Mahkemesi, Karar no 2023/3091.

third country. The court found this denial unlawful, as it violated the constitutional principle of family unity, and ruled that the application should have been evaluated under the appropriate legal provisions. The Istanbul 1st Administrative Court annulled the decision in 2023, ordering the defendant to cover the plaintiff's legal expenses and allowing for an appeal within 30 days.

According to Ali Yerlikaya, since June 2022, no more temporary protection registers had been made.⁵⁰¹

2. Iraq

Iraqis are generally granted short-term residence permits once they are in Türkiye. However, according to statistics from the PMM, Iraqi nationals constituted the second largest group of applicants for international protection in 2024.

According to stakeholders, in 2024, many Iraqi Christians, primarily Chaldeans, continued to reside in Türkiye under international protection applications. The majority remain in specific neighbourhoods in İstanbul, where they have been waiting for years for their applications to be assessed. Despite prolonged stays, they live with the constant fear of being returned to Iraq, where political developments are often cited by authorities as grounds for potential return. In earlier years, particularly before and during 2017, a significant number of Iraqi Christians were resettled, mainly to the United States, when resettlement quotas were higher. However, as resettlement numbers declined, those with similar protection claims as previously resettled individuals have been left in limbo, now facing the possibility of rejection by Turkish authorities.

3. Afghanistan

The barriers to access to the procedure following the takeover of registration of applicants for international protection by PMM (see [Registration](#)) have had particularly adverse effects on Afghan nationals.

This situation for Afghan refugees in Türkiye remained extremely difficult in 2024.⁵⁰² The significant number of arrivals from Afghanistan to Türkiye was one of the biggest issues. An extremely negative response was given to irregular crossings at the Iranian border, and the public perception that Afghan single men "do not need international protection" remained persistent in 2024.⁵⁰³ In contrast, a report prepared by the Migration and Social Cohesion Commission of the Turkish National Grand Assembly challenges the prevalent perception that the majority of Afghans are single men economic migrants. According to the report, a great numbering of Afghans entering Türkiye after August 2021 were 'secular and educated families'.⁵⁰⁴

A study from 2022 surveyed 774 Afghans in seven cities across Türkiye to understand their living conditions and mobility aspirations. Increasing prices in the country, expensive utility bills and having low income make it difficult for Afghans to afford food and housing.⁵⁰⁵ It found that two-thirds of Afghans live in poverty and daily work is the main source of income. Nearly half of respondents strongly consider moving to another country, but only 16% have concrete plans to leave their current country. The survey found that almost a quarter of respondents consider it impossible to move to another country in their current situation, while more than one-third would like to permanently stay in Türkiye if the possibility existed. Despite experiences of discrimination, feelings of belonging increase with length of stay, and Afghans and Syrians are the most discriminated against nationalities in Türkiye. Low expectations for the future are expressed by two-thirds of new arrivals and almost half of those who had previously migrated or were born in Türkiye.⁵⁰⁶

⁵⁰¹ İçişleri Bakanı Ali Yerlikaya: "Göçü Kaynağında Durdurduk", 14 August 2024, available [here](#).

⁵⁰² ICMPD, 'Migration Outlook 2022 Western Balkans & Turkey Nine migration issues to look out for in 2022', 2022, available [here](#). & Information provided by stakeholders, March – April 2024.

⁵⁰³ Information provided by several stakeholders, May-June 2023 and March – April 2024.

⁵⁰⁴ DW, 'Meclis'ten göç raporu: Cezalar yetersiz', 10 June 2022, available in Turkish [here](#).

⁵⁰⁵ Can Eminoğlu, 'Strategizing to Survive in Liminal Life: Ghost-Like Agency of Afghan Refugees in Turkey', July 2022, available [here](#).

⁵⁰⁶ R. Rischke & Z. Yanaşmayan - DeZim Institut, Die prekäre Situation von Afghan*innen in der Türkei, August 2022.

A study from 2023⁵⁰⁷ revealed that Afghans in Türkiye experience a degree of non-deportability due to the informal labour market's demand for their work, despite increasing deportations publicised by state officials. Afghans endure long hours in dangerous jobs, often unpaid, and are tolerated in informal employment despite restrictions on inter-city travel. Recent deportations are politically motivated, exacerbated by economic issues and anti-refugee sentiment. Afghans face a precarious existence without structural protection or durable solutions. The Turkish state's approach lacks formal protection, relying on problematic informal measures. Another study conducted in Ankara, Bursa, Malatya, Kayseri and Istanbul supports a similar argument that Afghan migrants have no legal protection and are thrown into despair by their employers' mistreatment⁵⁰⁸. GAR Report⁵⁰⁹ identified three mechanisms on irregularisation of Afghans, especially for the newly arriving young single males: (1) delaying applications by the PDMs, (2) not providing detailed information about the registration, and (3) "default rejection".

Afghan refugees in Türkiye face significant difficulties with registration and legal procedures. They lack awareness regarding relevant Turkish institutions and struggle to maintain bureaucratic relations, particularly unaccompanied minors. Many unregistered Afghan children live and work informally, without access to education. Afghan individuals avoid public institutions, making registration rates low. Obtaining power of attorney and necessary documents for legal cases is nearly impossible for Afghans. Afghan embassies cannot issue passports since August 2021. Inconsistent case law on Afghanistan persists despite the suspension of deportations. Some applicants have successfully appealed negative decisions due to persecution risks or insufficient research, while others have been denied protection based on economic reasons.⁵¹⁰ Afghan single males are the main group targeted by pushbacks to Iran.⁵¹¹

The forced/voluntary returns of Afghans, after halting for a couple of months following the fall of Kabul, started in 2022, and continue in 2024.⁵¹²

4. Ukraine

As a member state of the Council of Europe, Ukrainians seeking asylum in Türkiye can be granted refugee or subsidiary protection if specific conditions are met. If a Ukrainian does not meet the criteria for refugee status, they may be eligible for subsidiary protection, provided that their specific circumstances in Ukraine meet the necessary conditions for this status.

Since Russia declared war against Ukraine in February 2022, 850,000 Ukrainians reached Türkiye.⁵¹³ As of May 2025, the numbers of Ukrainian displaced people decreased to 35,170, including 2,930 who applied for international protection⁵¹⁴. The majority of Ukrainians prefer to reside in metropolitan cities such as **Istanbul, Ankara, Izmir, Antalya, Muğla, and Bursa** because of the availability of temporary shelter services, Ukrainian diaspora in those cities and employment opportunities. Ukrainians of Meskhetian Turks, Crimean Tatar, and Gagarus Turk prefer to reside in **Bursa, Kırklareli, and Eskişehir**. As of May 2025, 33,175 Ukrainians hold residence permit, including 20,955 short term residence permits, and 6,476 family residence permits.⁵¹⁵ There is a tendency not to apply for International Protection, rather preferring to stay in Türkiye with a residence permit, in order to be able to travel back to Ukraine or move to EU countries.⁵¹⁶

Once Ukrainians, at first 300 individuals, predominantly women and children, arrived in Türkiye via Bulgaria by buses, they were housed in dormitories in **Edirne, Eskişehir, and Bursa**. When additional refugee groups arrived in Ankara, authorities did not know how to manage the number of arrivals of the Ukrainians'

⁵⁰⁷ Sibel Karadağ, Deniz Ş Sert, (Non-)deport to Discipline: The Daily Life of Afghans in Turkey, Journal of Refugee Studies, Volume 36, Issue 3, September 2023, Pages 449–466, available [here](#).

⁵⁰⁸ Jurat, A. Y. (2022). The tragedy of irregular migration: the case of Afghans in Turkey. Central Asian Survey, 42(2), 274–292. Available [here](#).

⁵⁰⁹ GAR, "(Non-)reception of the Afghans in Turkey", GAR Report No. 9, October 2023

⁵¹⁰ Information provided by various stakeholders, May- June 2023 & Information provided by stakeholders, March-April 2024.

⁵¹¹ Information provided by stakeholders, March- April 2024.

⁵¹² Information provided by a stakeholder, May 2022 and May 2025

⁵¹³ Ukrinform, More than 31,500 Ukrainian citizens officially reside in Turkey, 17.01.2025, available [here](#).

⁵¹⁴ UNHCR, Ukraine Refugee Situation, available [here](#).

⁵¹⁵ PMM, Statistics, last updated May 2025, available [here](#).

⁵¹⁶ Information provided by stakeholders, March- April 2024.

applications for international protection. Approximately 200 guests stayed in a dormitory in Gölbaşı, **Ankara** they had been granted access to by an affluent Turkish businessman. Initially, it was for three months, but their stay was subsequently extended. Some Ukrainians were resettled in third countries, while others returned to Ukraine. The Ukrainian Cultural Centre in Ankara initiated a matching programme between newly arrived Ukrainians and Turkish families. Some women and children were housed in Reception and Accommodation Centre in **Yozgat**.⁵¹⁷ There were 551 Crimean Tatars and Meskhetian Turks among the Ukrainian citizens who came to Türkiye, who were placed in dormitories in **Edirne** and **Kırklareli**, with support from AFAD.⁵¹⁸ On 3 June 2022, a Presidential Decree granting 1000 households of Meskhetian Turks in need of protection for permanent residency (*iskanli gocmen*) entered into force.⁵¹⁹ Meskhetian Turks were placed in the **Elazığ** Temporary Accommodation Centre, the Red Crescent provide support, such as voucher cards.⁵²⁰

According to stakeholders, there were four categories of Ukrainians living in Türkiye: (1) Ukrainians holding short- or long-term residence permits (i.e. Ukrainians who had previously visited Türkiye, or having relatives in Türkiye); (2) applicants for international protection whose economic conditions were worse comparing to other groups and who had no contacts in Türkiye; (3) Ukrainians having a humanitarian visa, primarily women and children directly affected by war by losing their close relatives in the war and (4) Crimean Tatars and Meskhetian Turks having permanent residence (*iskanli gocmen*) in Türkiye.

After the initial 2 months, the registration and residence permit processes were accelerated significantly, and applicants gained access to health care and other services promptly. During this two-month gap period, the UNHCR provided assistance to individuals with special needs, such as those living with HIV or chronic diseases. All those holding the status of asylum applicants and have the right to access services; however, some Ukrainians with residence permits experienced difficulty gaining access to health care. As part of the deconcentration policy, certain neighbourhoods, such as Istanbul and Antalya, were closed to registration. However, Ukrainians were benefitted from a more flexible approach in terms of registration to those closed cities, if they have family members living there.⁵²¹ Ukrainians benefitted from social aid programmes such as ESN and CCTV.⁵²² Some support initiatives already began by April 2022, including as one in the Kuşadası Municipality for Ukrainian women who fled their country to work online and earn money.⁵²³ NGOs such as SGDD-ASAM provided online counselling in Russian and Ukrainians⁵²⁴ and provided some sub-grants to Ukrainian-led organisations.

According to stakeholders, the identified needs, including basic requirements, of Ukrainians remained unmet, due to difficulties in gaining access to services, and the absence of legal documents among Ukrainian beneficiaries. Reasons such as language barrier, insufficient financial resources, and difficulties in accessing job opportunities, lack of knowledge of legal regulations, and lack of information about rights, services, and obligations among individuals have contributed to the continuation of these problems.⁵²⁵ However, due to the strong social networks that many of them have in Türkiye, they often do not approach to NGOs and municipalities to access social aid, which is interpreted by the stakeholders that their initial needs are met.⁵²⁶

⁵¹⁷ Information provided by a stakeholder, March 2023.

⁵¹⁸ Anadolu Ajansı, 'Humanitarian Aid sent from Türkiye to Ukraine', 7 March 2022 available [here](#)

⁵¹⁹ Resmî Gazete, CUMHURBAŞKANI KARARI, 3 June 2022, Available in Turkish [here](#)

⁵²⁰ Kızılay, Geçici Barınma Merkezi'ne Yerleştirilen Ahıska Türklerine Kızılaykart Desteği, 26.09.2022, available [here](#).

⁵²¹ Information provided by a stakeholder, March 2024.

⁵²² Information provided by a stakeholder, March 2023.

⁵²³ Bizimizmir, 'kusadasi ukraynali savas magduru kadınlara kusadasi istasyon topluluk merkezi ni acti' last accessed 13 July 2023, available in Turkish [here](#).

⁵²⁴ SGDD, ASAM, 'Türkiye'deki Hassas Durumdaki Göçmenlere Hukuki Destek ve Hizmet Sağlanması Projesi', last accessed 13 July 2023, available [here](#).

⁵²⁵ ASAM, Activity Report on Humanitarian Assistance Provided Towards Ukrainians In Türkiye, 3 August 2022.

⁵²⁶ Information provided by stakeholders, March – April 2024.

5. Other nationalities

In 2023, there was a policy change regarding issuing residence permits, a number of short-term residence permits applications were denied.⁵²⁷ In 2024, this trend continued, with PDMM offices increasingly refusing to accept short-term residence permit applications. In case of the need for protection after their residence permits were not prolonged, they have faced difficulties accessing to the international protection application. Applicants whose requests for residence permits were denied continued to reside in Türkiye despite the illegality of their stay, as submitting a lawsuit has no suspensive effect, unlike deportation cases.⁵²⁸ Migrants from Africa who held residence permit previously face difficulties to renew their permits, consequently they found themselves as undocumented migrants who cannot access basic rights and services due to the fear of deportation⁵²⁹.

Russian single young men who do not want to enlist in the military, anti-war activists, political opponents and middle-class professionals pessimistic about their economic prospects at home in the aftermath the sanctions appeared to be particularly likely to migrate to Türkiye.⁵³⁰ It is estimated that around 200,000 Russians moved abroad due to the political and economic consequences of the war and that around 3,000 Russians had already moved to Türkiye before the start of war at the beginning of February 2022.⁵³¹ The Ark is one of several small-scale NGOs in Türkiye that assist Russians seeking refuge in Türkiye.

Russians can stay in Türkiye for up to three months without a visa, but those who want to stay longer must apply for resident permits. Russians ranked first in long-term residency permits with 146,063 and third in family permits with 7,732 as of 25 May 2023. As of May 2025, they are ranked third in the residency permit holders in Türkiye, with 82,087 and first in family permits with 16,946. Overall, the number of residence permits holder Russians decreased dramatically in Türkiye. The policy of not renewing residence permits is also very closely related to the economic crisis, it is a strategy aimed entirely at relieving the real estate market, this is one of the reasons why Russians had to leave in large numbers, and then there was a decrease in real estate prices, especially in cities such as Antalya⁵³².

⁵²⁷ Information provided by stakeholders, March – April 2024.

⁵²⁸ Information provided by a stakeholder, April 2023.

⁵²⁹ Information provided by a stakeholder, March 2024.

⁵³⁰ Sebnem Turhan, 'In Istanbul, fleeing Russians mull next step of self-exile', Al-Monitor, 16 March 2022, available [here](#). Euronews, Türkiye'ye göç eden savaş karşıtı Ruslar yeni bir hayat kurma peşinde, 5 July 2022, available [here](#).

⁵³¹ Burcu Karakas, 'Istanbul: Popular destination for Russian dissidents', DW, 07 February 2022, available [here](#)

⁵³² Information provided by a stakeholder, March 2024.

Reception Conditions

As of mid-2024 end 2023, the largest groups among asylum seekers were 91,373 Afghans, 89,397 Iraqis, and 9,280 Iranians.⁵³³ In 2024, 9,009 individuals applied for international protection in Türkiye, including 5,550 Afghans, 1,881 Iraqis, 784 Iranians, and 794 from other nationalities.⁵³⁴

In 2019, PMM issued the Cohesion Strategy and National Action Plan,⁵³⁵ according to which six thematic areas are to be addressed: social cohesion, information, education, health, labour market and social support. In general, however, the Plan has not been visible or well-known. As of 2024, the strategic plan is outdated, and no new plan is currently in effect. However, preparations for a new plan are underway.⁵³⁶ Due to the challenging period for Türkiye economically and increased anti-migration discourse and xenophobia, cohesion attempts are less visible.⁵³⁷ One concrete example given of the implementation of the plan was the founding of 16 migration-counselling centres⁵³⁸ in 2021 and in 2023 21 centres in 16 cities were actively working. In 2024, the migration-counselling centers were suspended. As the five-year plan is due to end in 2023, UNHCR is collaborating with PMM on the drafting of its revised Strategy and National Action Plan.⁵³⁹

Municipalities play a crucial role in providing social aid to all individuals, regardless of their status or nationality⁵⁴⁰. To enhance the organisation and sustainability of migration-related activities, the Union of Turkish Municipalities established the Migration and Integration Centre in 2020. Many municipalities have created special units focused on migration, while others integrate this work into existing departments.⁵⁴¹

For example, Adana Municipality manages various projects, services, and studies through its Migration and Migrant Affairs Department, and Migrant Coordination Integration Centre. Similarly, to address the needs of migrants in Izmir, the “Refugee Desk” was established in September 2020 under the Urban Justice and Equality Department, in collaboration with the UNHCR. Şanlıurfa Municipality has set up a dedicated Migration and Integration Services Department. Having specialised migration units in municipalities ensures designated budgets and legal obligations, including strategic planning and annual activity report follow-ups⁵⁴². These units not only provide social aid but also disseminate information to both refugees and municipal staff. For instance, Izmir Metropolitan Municipality published an information booklet for municipality employees regarding refugees.⁵⁴³ Also, in Izmir, the Women’s Services Unit of the Metropolitan Municipality, along with the Konak Municipality’s community centre, collaborates with NGOs active in the migration field⁵⁴⁴. Main challenges faced by municipalities is lack of capacity, such as lack of translators⁵⁴⁵, lack of funding and public attitudes resisting the rights-based approach.⁵⁴⁶

In 2020, the “Mayors’ Migration Platform and Migration Policy Document”⁵⁴⁷ was developed through a participatory process involving mayors, roundtable meetings, and technical studies. This document offers policy recommendations to address the main challenges faced by municipalities, such as financial and legal

⁵³³ UNHCR Türkiye Factsheet September 2024, available [here](#).

⁵³⁴ PMM, Statistics 2023, available [here](#).

⁵³⁵ See PMM, *Uyum Strateji Belgesi ve Ulusal Eylem Planı 2018-2023*, available in Turkish [here](#).

⁵³⁶ TIHEK, Uyum Strateji Belgesi ve Ulusal Eylem Planı Güncelleme Çalıştayına Katılım Sağlandı, 16.06.2023, available [here](#)

⁵³⁷ Information provided by stakeholders, March – April 2024.

⁵³⁸ PMM website, ‘A Preparatory Training Program for Migration Counseling Centres Staff Was Held’, 29 June 2021. Available in Turkish [here](#).

⁵³⁹ UNHCR, Türkiye Factsheet, September 2023, available [here](#).

⁵⁴⁰ Erdogan, Şener, and Ağca, Marmara’nın Kent Mültecileri: Belediyelerin Süreç Yönetimi, 2021, available [here](#)

⁵⁴¹ Belediyeler Kasım-Aralık 2021, Yerel Yönetimlerin Göç Politikaları, available [here](#) & Information provided by stakeholders, March – April 2024.

⁵⁴² Information provided by stakeholders, March 2024.

⁵⁴³ Izmir Belediyesi, Belediye Çalışanları için Mültecilere Yönelik Bilgilendirme Kitapçığı, available [here](#).

⁵⁴⁴ Information provided by a stakeholder, April 2025.

⁵⁴⁵ TESEV, Erginli & Akdoğan, Belediyelerde Göç Veri Yönetimi ve Veriye Dayalı Karar Alma Politika Raporu, 2024, available [here](#).

⁵⁴⁶ Information provided by stakeholders, March 2024.

⁵⁴⁷ Belediyeler Kasım-Aralık 2021, Yerel Yönetimlerin Göç Politikaları, available [here](#).

issues. It emphasises the need to clarify municipal authority and responsibility, enhance social harmony, and strengthen institutional capacities and coordination with other relevant bodies, with support from the central administration. The **Istanbul** Metropolitan Municipality (IMM) has prepared a strategy plan that was developed through a participatory process in order to produce an effective and permanent policy in migration governance. A people-oriented strategy with the perspective of leaving no one behind has been prepared to be implemented in 2020-2024. In the scope of the strategy, 4 main objectives have been determined: coordination, capacity building, research and data collection, social cohesion.⁵⁴⁸ However, due to the politisation of the subject and increased anti-migrant sentiments and the lack of sufficient funding, the visibility of the activities and services provided by municipalities decreased in 2024. For example, when NGOs requested to distribute earthquake-related aid in İzmir, officials from the İzmir Metropolitan Municipality reportedly questioned the inclusion of asylum seekers, stating that priority should be given to Turkish earthquake survivors. However, NGO staff were eventually able to persuade the officials, and the aid was distributed directly by the NGOs rather than by the Municipality. Also, a stakeholder mentioned that while some municipalities previously provided space for refugee counselling without any appointment system, in 2024 they began scheduling individual sessions in advance to avoid having multiple foreigners visibly waiting together, which might attract the attention of local residents.⁵⁴⁹

The Istanbul Metropolitan Municipality Institute (ISMEK) offered training in pastry making, textiles, and barista skills. In June, ISMEK completed two barista training courses for refugees and locals, including 15 refugees. UNHCR provided consumables and equipment for these courses and will support the graduates' employment by leveraging their newly acquired skills. ISMEK's pastry and textile machinery operator courses also continue in 2024.⁵⁵⁰

UNHCR also provided core relief items to enhance the capacity of national and local authorities to address needs. In 2024, UNHCR provided over 19,000 winterisation items, including radiators, blankets, hygiene parcels, kitchen sets, and foam mattresses to container sites, informal sites, municipalities, and state-run centres in affected provinces.⁵⁵¹

A training programme named Social Cohesion and Life Training (SUYE) has been launched by PMM and the project was completed in March 2023. The course lasts eight hours and covers topics such as the social structure of Türkiye, its rights and obligations, and its traditions and customs. It targets migrants and refugees between the ages of 18 and 65. The instruction is provided at public education facilities (halk eğitim merkezi)⁵⁵² in 16 cities that are closely supervised by Turk Kızılay, SGDD-ASAM, and the UNHCR. As of 9 September 2022, according to PPM, 444,488 women and 503,000 men had participated in this training, and more than 1 million people had been trained overall. Interpretation services in Arabic and Persian⁵⁵³ are available if necessary. Registration for the training is available in 7 languages and participants are given a certificate of participation at the end of the training.⁵⁵⁴ Over the second half of 2022, over 39,000 refugees and host community members participated in such events, although this was significantly less than the over 125,000 recorded in the first half of the year.⁵⁵⁵ According to a stakeholder, in 2024, individuals received phone calls from PDMM officials who emphasized that it was crucial for them to attend these courses.⁵⁵⁶

⁵⁴⁸ UNHCR, Migration and Social Cohesion Action Plan (2020-2024) | The Global Compact on Refugees, available [here](#).

⁵⁴⁹ Information provided by multiple stakeholders, April and May 2025

⁵⁵⁰ Information provided by a stakeholder May 2025

⁵⁵¹ UN Türkiye, Two Years After the 2023 Earthquakes: The UN's Continued Commitment, 06.02.2025, available [here](#)

⁵⁵² Hayat Boyu Öğrenme Genel Müdürlüğü 2023 Yılı Birim Faaliyet Raporu, available [here](#).

⁵⁵³ AA, 'Göç İdaresi Başkanlığından Türkiye'deki yerleşik yabancılara sosyal uyum eğitimi', 19 September 2022, available [here](#).

⁵⁵⁴ PMM, Halk Eğitimi Kursları İle Sosyal Uyum Ve Yaşam Eğitimine Erişim, [here](#).

⁵⁵⁵ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 11, June 2023, available [here](#).

⁵⁵⁶ Information provided by a stakeholder May 2025.

Overall, social cohesion and targeted reception activities are difficult because refugees still face severe problems with their legal status and accessing registration.⁵⁵⁷ The economic and social difficulties experienced by refugees/asylum-seekers living in Türkiye in 2024 also deepened. Over the last years, Türkiye has experienced many incidents in which the prominent anti-refugee and migrant discourse in the media has triggered hate attacks, attempted killings, and violent uprisings targeting refugees and migrants in various regions.⁵⁵⁸ Racism and discrimination are pervasive in Türkiye and continued to be reported as an issue in 2024. For instance, a Syrian child who was selling hairpins were beaten by a man in Istanbul's one of prominent subway lines.⁵⁵⁹ According to the findings of the TIHV, in the first 11 months of 2024, two refugees/asylum seekers lost their lives in removal centres. Additionally, at least six refugees or asylum seekers died and nine others were injured as a result of violent attacks, including hate-motivated aggression targeting these groups.⁵⁶⁰ In 2024, in Gaziantep, a 15-year-old Syrian child was reportedly abducted and severely beaten by the family of a friend he was playing with, allegedly due to a minor dispute; the perpetrators, who left him by the roadside believing he was dead, were later arrested.⁵⁶¹ In 2024, a Syrian national, was reportedly attacked in broad daylight in the Kökez neighbourhood of Serik by three individuals who arrived on two motorcycles; he was beaten and fatally stabbed at the scene⁵⁶². In another case, a Gabonese university student who was killed in 2023, the only suspect was acquitted in 2024⁵⁶³ and has increased on refugee journalists and activists with the increased the fear of deportation.⁵⁶⁴

In addition to the protracted displacement of Syrian refugees and the increasing number of irregular arrivals in Türkiye⁵⁶⁵, high inflation deepened the economic hardships faced by both local and displaced communities, destructive earthquakes in the region hosting the highest number of temporary protection beneficiaries, increased anti-migrant/refugee sentiments, anti-migrant discourse during the election period lead to increasing challenges on social cohesion between refugees, migrants and host communities. In 2024 the downturn of social cohesion and inclusion continued. According to a survey, half of the participants view Syrians as likely to cause economic and social problems in the future.⁵⁶⁶

Since 2022, hate speech and restrictions towards refugees were even reflected by politicians. Particularly, the party leaders' anti-refugee rhetoric and campaign promises to "send refugees home" during the election campaigns in Türkiye alarmed refugees,⁵⁶⁷ made them quite worried about their future in Türkiye⁵⁶⁸ and forced them to invisibility⁵⁶⁹. During Türkiye's 2023 Parliamentary and Presidential elections, the refugee issue was heavily politicised, with several parties adopting explicit anti-refugee stances⁵⁷⁰. As economic difficulties and concerns over the migrant population grew, political parties, with exception of a few parties, adopted increasingly anti-refugee stances to gain public support.⁵⁷¹ This shift was particularly evident with the emergence of the anti-migrant Victory (Zafer) Party, which intensified the anti-refugee rhetoric.⁵⁷² Campaigns frequently promised the return of Syrian refugees, reflecting rising anti-migrant sentiments among voters. President Erdoğan's administration has responded with plans for the voluntary return of refugees. The increasing anti-refugee sentiment and its exploitation in political campaigns raise concerns

⁵⁵⁷ Information provided by stakeholders, March - April 2024.

⁵⁵⁸ HBS Thessaloniki, Media & Migration Association, Media Representation of Refugees and Migants in Turkey, June 2023, available [here](#).

⁵⁵⁹ İlketv, Metroda toka satan çocuğu döven kişi gözaltına alındı, 29.08.2024, available [here](#).

⁵⁶⁰ TIHV & IHD, Verilerle 2024 Yılında Türkiye'de İnsan Hakları İhlalleri, 10.12.2024, available [here](#).

⁵⁶¹ İlkha, Suriyeli çocuğu darp eden şahıslar tutuklandı, 01.12.2024, available [here](#)

⁵⁶² Bianet, Serik'te Suriyeli mülteci çocuk işçiyi öldürdükleri iddiasıyla üç çocuk tutuklandı, 03.07.2024, available [here](#).

⁵⁶³ Euronews, Karabük'te ölü bulunan Gabonlu Dina davasındaki tek sanık beraat etti, 17.12.2024, available [here](#)

⁵⁶⁴ Information provided by a stakeholder, March 2024.

⁵⁶⁵ EC, Seventh Annual Report of the Facility for Refugees in Turkey, COM(2023) 543 final, 22.9.2023, Brussels.

⁵⁶⁶ UNHCR and MÜGAM, Syrians Barometer "A framework for achieving social cohesion with Syrians in Türkiye" August 2024, available [here](#).

⁵⁶⁷ Euronews, 'Türkiye'de Suriyeli sığınmacılar endişeli', 19 May 2023, available in Turkish [here](#).

⁵⁶⁸ VOA, 'Suriyeli Karşıtı Propagandanın Nedeni Ekonomik mi?', 2022, available [here](#). & Information provided by stakeholders, March – April 2024.

⁵⁶⁹ Information provided by stakeholder, March – April 2024.

⁵⁷⁰ Mengücek and Kurt, 10 July 2023, The politicization of refugees in Turkey's elections is not yet over with local elections on the way, available [here](#).

⁵⁷¹ Balta, Elçi & Sert, 2023 Seçimleri ve Türkiye'deki Göç Tartışmaları, Heinrich Böll Foundation, available [here](#).

⁵⁷² Nefret Döngüsü Günden İzleme Serisi, Seçim Özel, 2023, available [here](#).

about social cohesion and potential violence against refugees⁵⁷³. While the refugee issue took centre stage during the 2023 elections, contrary to expectations it did not feature prominently in local election campaigns.⁵⁷⁴ According to a report, discriminatory practices against refugees persisted in 2024.⁵⁷⁵ However, there were some positive judicial and institutional decisions in 2024 regarding discriminatory practices. In May, TİHEK ruled that a municipal decision to remove only Arabic-language shop signs constituted discrimination and imposed an administrative fine.⁵⁷⁶ Separately, in February 2025, an administrative court annulled a municipal decision that imposed disproportionately high marriage and documentation fees on foreigners, citing violations of equality and anti-discrimination principles.⁵⁷⁷

The Bolu Municipality posted slogans on billboards stating all refugees should return to their home countries as their presence in Türkiye fuelled unemployment, the crime rate, and hindered pace. Based on hate speech and incitement to hatred, the Bolu Prosecutor's Office initiated a criminal investigation.⁵⁷⁸ In 2023, Bolu mayor removed the sign of "Bolu Afghanistan Youth Social Cultural and Solidarity Association", even though the sign was in Turkish⁵⁷⁹. PMM informed the public that signboards were regularly controlled and in 2022, only 3,643 out of 19,309 signboards were identified as against regulations.⁵⁸⁰ In July 2022, Muhammed İsa Abdullah, the owner of a Somalian restaurant, filed a complaint against the police for painting the restaurant's signboard white and closing it down for violating laws. He said that he had to change the name of his restaurants since they were frequently and arbitrarily searched by the police. According to the news, PDMM also issued a deportation order against him.⁵⁸¹ Abdullah also lodged a complaint before the Türkiye Human Rights and Anti-Discrimination Body regarding discrimination based on refugee status, but the Body dismissed his complaint.⁵⁸² In **Kocaeli**, the Chair of Kocaeli Chamber of Small Shop Owners said that signboards in Arabic would not be allowed.⁵⁸³ This trend continues in various cities (such as in Uşak, Kilis, Bursa, İzmir and Yalova), especially after the local election in 2024. Before and after the local elections in March 2024, some candidates continued to use anti-refugee rhetoric. In April 2024, a newly elected mayor in western Türkiye ordered the closure of businesses operated by refugees lacking official permits, stating an intent to ensure their departure from the city.⁵⁸⁴ Around the same time, another mayor publicly declared he would not issue any business licenses to Afghan or Syrian nationals and expressed his opposition to the presence of refugees in strong terms.⁵⁸⁵ In early 2025, an investigation initiated against Bolu Mayor due to his speeches on migrants and refugees.⁵⁸⁶

⁵⁷³ Mengücek and Kurt, 10 July 2023, The politicization of refugees in Turkey's elections is not yet over with local elections on the way & Balta, Elçi & Sert, 2023 Seçimleri ve Türkiye'deki Göç Tartışmaları, Heinrich Böll Foundation, available [here](#).

⁵⁷⁴ Information provided by stakeholder, March – April 2024.

⁵⁷⁵ İnsan Hakları Derneği (Human Rights Association) İnsan Hakları Eylem Planı Çerçevesinde Mülteci Hakları Raporu, April 2024, available [here](#)

⁵⁷⁶ AA, TİHEK, Bursa'da sadece Arapça tabelalara yasak getirilmesini "ayrımcılık" saydı, 15.04.2025, available [here](#)

⁵⁷⁷ UMHD, 28 Şubat Sarayköy Belediyesi Meclis Kararları, available [here](#)

⁵⁷⁸ NTV, 'Bolu Belediyesi'nin sığınmacılarla ilgili afişine soruşturma', 19 May 2022, available in Turkish [here](#).

⁵⁷⁹ Duvar, Tanju Özcan, mülteci derneğinin Türkçe tabelasını söktü, 11.11.2023, available [here](#).

⁵⁸⁰ PMM, 'Tabela Denetimlerine İlişkin Basın Duyurusu', 18 June 2022, available in Turkish [here](#).

⁵⁸¹ Euronews, 'Ankara'da restoranını polis basan Somalili aile: Suçumuz varsa kapatırız', 12 July 2023, available in Turkish [here](#).

⁵⁸² Duvar, 'TİHEK'in 'Somalili Abdullah' kararına 5 üye şerh düştü: Kolluk 'ayrımcılık yasağını' ihlal etti', 26 September 2022, available in Turkish [here](#).

⁵⁸³ Özgür Kocaeli, 'Kütük: "Arabic signage will no longer be used"', 7 February 2022, available in Turkish, [here](#).

⁵⁸⁴ Serbestiyet, CHP'li Afyon Belediye Başkanı Burcu Köksal sığınmacılara ait iş yerlerini kapattı: "Mültecilerin şehrimizden ayrılmaları için ne gerekiyorsa yapacağım", 20.04.2024, available [here](#).

⁵⁸⁵ Yeniçağ, Afgan'a Suriyeliye işyeri açma ruhsatı vermeyeceğim. Atmazsam şerefsizim. Herkes Uşak'ın yeni CHP'li başkanını konuşuyor, 03.04.2024, available [here](#).

⁵⁸⁶ BBC Türkçe, Bolu Belediye Başkanı Tanju Özcan hakkında soruşturma başlatıldı, 05.01.2025, available [here](#).

A. Access and forms of reception conditions

1. Criteria and restrictions to access reception conditions

Indicators: Criteria and Restrictions to Reception Conditions

1. Does the law make material reception conditions to asylum seekers in the following stages of the asylum procedure?
- | | | | |
|---------------------------|---|---|-----------------------------|
| ❖ Regular procedure | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ Admissibility procedure | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ Accelerated procedure | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ First appeal | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ Onward appeal | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ Subsequent application | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
2. Is there a requirement in the law that only asylum seekers who lack resources are entitled to material reception conditions? Yes No

International protection applicants are entitled to reception conditions from the moment they make a request for international protection and continue to be eligible until a final negative decision is issued.

Under Articles 65 and 69, the LFIP differentiates between the act of “requesting international protection” (*uluslararası koruma talebinde bulunan*) which can be expressed to any state authorities and the “registration of an application for international protection” (*uluslararası koruma başvurusunun kaydı*) by PMM. Therefore, persons must be considered as international protection applicants from the time they approach state authorities and express a request to apply for international protection. The actual registration of an applicant by PMM may come later.

That said, holding a Foreigners Identification Number (*Yabancı kimlik numarası*, YKN) is an essential prerequisite for all foreign nationals in procedures and proceedings regarding access to basic rights and services. International protection applicants are not assigned an YKN until they are issued an International Protection Applicant Identification Card after they have travelled to their assigned “province of residence” and have registered their application with the competent PDMM. Given the severe obstacles to and corollary delays in accessing the international protection procedure (see [Registration](#)), the time lag between an asylum seeker’s intention to apply for international protection and the issuance of an YKN can be particularly long. This leaves asylum seekers without access to some basic rights.

1.1. Restrictions on reception conditions by type of procedure

With regard to (a) information, (b) provisions for family unity, (c) and provisions for vulnerable persons, both regular procedure applicants and accelerated procedure applicants are subject to the same level of rights and benefits.

With regard to: (a) documentation; (b) freedom of movement and accommodation; (c) “material reception conditions” i.e. housing, social assistance and benefits, financial allowance; (d) healthcare; (e) vocational training; (f) schooling and education for minors; (g) and employment, there are differences in the level and modalities of reception conditions committed to applicants processed in the regular procedure and those processed in the accelerated procedure.

Furthermore, applicants who are detained during the processing of their application and processed under the accelerated procedure – including those detained at border premises – are subject to specific reception modalities. Applicants in whose case an inadmissibility decision has been taken – whether their application was being processed under the regular procedure or the accelerated procedure – will continue to be subject to the same reception regime as before, until the inadmissibility decision becomes final.

1.2. Means assessment

The LFIP contains a “means” test for some of the reception rights and benefits but not for others. If there is no means criterion for access to primary and secondary education and access to labour market, it is the case for health care, social assistance and benefits and financial allowance, applicants are subject to a means criterion. The PDMM shall conduct this assessment on the basis of the following considerations:⁵⁸⁷

- a. whether the applicants have the means to pay for their shelter;
- b. level of monthly income;
- c. number of dependant family members;
- ç. any real estate owned in Türkiye or country of origin;
- d. whether they receive financial assistance from family members in Türkiye or country of origin;
- e. whether they receive financial assistance from any official bodies in Türkiye or NGOs;
- f. whether they already have health insurance coverage;
- g. any other considerations deemed appropriate.

Where it is determined that an applicant has unduly benefited from services, assistance and other benefits, they shall be obliged to refund costs in part or in their entirety.⁵⁸⁸

Furthermore, for applicants who fail to comply with the obligations listed in Article 89 LFIP or to whom a negative status decision was issued, the PMM “may” reduce rights and benefits, with the exception of education rights for children and basic health care.⁵⁸⁹

2. Forms and levels of material reception conditions

Indicators: Forms and Levels of Material Reception Conditions

- | | |
|---|---------------|
| 1. Amount of the monthly financial allowance/vouchers granted to asylum seekers as of 31 December 2024 (in original currency and in €): | Not available |
|---|---------------|

While the LFIP does not employ the term of “reception conditions” as such, Articles 88 and 89 LFIP commit a set of rights, entitlements and benefits for international protection applicants, which thematically and substantially fall within the scope of the EU Reception Conditions Directive.

Articles 88 and 89 LFIP govern the level of provision and access that shall be granted to international protection applicants (and status holders) in the areas of education, health care, social assistance and services, access to labour market, financial allowance. Türkiye does not commit the provision of shelter to international protection on applicants,⁵⁹⁰ but authorises PMM to extend, on discretionary basis, state-funded accommodation to international protection applicants under the auspices of Reception and Accommodation Centres. At present, there is only one Reception and Accommodation Centre in operation in **Yozgat**.⁵⁹¹

Rights and benefits granted to international protection applicants and status holders may not exceed the level of rights and benefits afforded to citizens.⁵⁹²

2.1. Financial allowance

International protection applicants who are identified to be “in need”, may be allocated a financial allowance by PMM.⁵⁹³ PMM shall establish the criteria and modalities for this financial allowance, and the Ministry of Finance’s input will be sought in determining the amounts. Applicants whose applications are identified to be inadmissible and those processed in accelerated procedure are excluded from financial allowance.

It must be underlined that this is not a right but rather a benefit that “may be” allocated to applicants in need by PMM on discretionary basis. PMM should put in place implementation guidelines, which may include guidance as to the specific criteria and procedure by which an applicant would be identified as “in need” for

⁵⁸⁷ Article 106(1) RFIP.

⁵⁸⁸ Article 90(1)(ç) LFIP.

⁵⁸⁹ Article 90(2) LFIP.

⁵⁹⁰ Article 95 LFIP.

⁵⁹¹ PMM, *Removal centres*, available [here](#).

⁵⁹² Article 88(2) LFIP.

⁵⁹³ Article 89(5) LFIP.

the purposes of financial allowance. In this regard, applicants are required to keep the competent PDMM informed of their up-to-date employment status, income, any real estate or other valuables acquired.⁵⁹⁴ This indicates that such information may be a factor in the assessment of necessity for the purpose of financial allowance. However, there is currently no implementation of Article 89(5) LFIP, and therefore the possibility of financial allowance to international protection applicants by the state remains only theoretical to date.

LGBTQI+ and other ex-minors benefit from UNHCR's fund and receive pocket money of around 6,000 TRY (130 EUR) a month. The cash support covers four types of vulnerable groups: 1-) ex-minors 2-) transgender minors 3-) survivors of gender-based violence 4-) intersex people; and is provided when they leave state premises.⁵⁹⁵ Like all UNHCR cash assistance programmes, this support also ended in May 2025 due to funding cuts earlier in the year.

2.2. Social assistance and benefits

International protection applicants identified “to be in need” can seek access to “social assistance and benefits”.⁵⁹⁶ The LFIP merely refers international protection applicants to existing state-funded “social assistance and benefits” dispensed by the provincial governorates as per Türkiye’s Law on Social Assistance and Solidarity. The Governorates dispense social assistance and benefits under this scheme by means of the Social Solidarity and Assistance Foundations; government agencies structured within the provincial governorates.

According to the Law on Social Assistance and Solidarity, the Governorates dispense both in kind assistance such as coal and wood for heating purposes, food and hygiene items and financial assistance to “poor and needy residents” in the province, including foreign nationals. It was launched in 2022 and continued to assist with electrical bills as a result of the increase in the cost of living⁵⁹⁷ in 2024. As such, it will be up to the provincial Social Solidarity and Assistance Foundation to determine whether they qualify for the “poor and needy” threshold.

The Social Solidarity and Assistance Foundation also provides disabled home care assistance to families who have a disabled family member who is unable to cater for their daily needs without the care and assistance of another family member. This is ongoing financial aid given to the carer. It is 3,912 TL / 110 EUR if the disability rate is between 40% and 70%, and 5,685 TL / 162 EUR if it is more than 70%, and 3,790 TL / 108 EUR for children with disability.⁵⁹⁸

There are also social assistance benefits granted by the Ministry of Family and Social Services. The social workers of the Ministry of Family and Social Services’ social service units take the final decision in practice. Their evaluation is based on criteria such as the presence of a working family member, provision of social assistance from other bodies, the presence of an emergency or numbers of children in the household. There are biannual or yearly assessment periods upon which social workers might stop this assistance if they deem that the financial situation of the family has changed. In addition, the Ministry of Family and Social Services has an assistance programme to increase the number of refugees speaking Turkish, in coordination with UNHCR.

Municipalities may also provide assistance to applicants for and beneficiaries of international protection. The types of assistance provided by the municipalities differ as they depend on the resources of each municipality. Assistance packages may include coal, food parcels, clothing and other kinds of non-food items. The eligibility criteria to receive assistance may also differ between municipalities.⁵⁹⁹

The Turkish Red Crescent (*Türk Kızılay*) is an important actor in this field and is active in each city of Türkiye as a public interest corporation. In most cases, their social assistance is not financial but in kind: distribution of wheelchairs to disabled persons, distribution of food, clothes or soup in winter for people in

⁵⁹⁴ Article 90(1) LFIP.

⁵⁹⁵ Information provided by a stakeholder, June 2023.

⁵⁹⁶ Article 79(2) LFIP.

⁵⁹⁷ Sosyal Yardım Programlarımız, available [here](#).

⁵⁹⁸ NTV, Evde bakım maaşı 2024'te ne kadar olacak? Engelli maaşı ne kadar oldu?, 27.12.2023, available [here](#).

⁵⁹⁹ UNHCR, *Social and financial assistance*, available [here](#). & Information provided by a stakeholder, March 2024.

need. They also have a special fund for people with special and emergency needs. With the help of this fund, they can provide medical help such as buying a prosthesis or hearing instruments for children.⁶⁰⁰ If the Turkish Red Crescent operates a community center in a given province, they can provide protection-based support such as rental assistance or psychiatric care. In most cases, such support is prioritized for individuals considered to be in vulnerable situations.⁶⁰¹

Beyond social assistance from the state, the EU has funded cash assistance programmes such as the Emergency Social Safety Net (ESSN), Commentary Emergency Social Safety Net (C-ESSN) and the Conditional Cash Transfer for Education (CCTE). These are described in [Temporary Protection: Social Welfare](#) as they are mainly, though not exclusively, addressed to Syrian temporary protection holders. Stakeholders emphasized that although there is no specific legal provision, in practice, individuals who benefit from home care assistance are not eligible for ESSN support, and vice versa.

Access to banking services and opening a bank account has long posed challenges for individuals holding an International Protection Applicant ID card in Türkiye. According to stakeholders, the situation has significantly worsened in 2024, with most banks reportedly declining to provide services to this group. As a result, many individuals struggle to receive cash assistance from various institutions, as these organizations require a bank account to process transfers.⁶⁰²

In 2024, the economic situation in Türkiye continues to be extremely difficult. While the effect of the 2023 earthquakes continues, inflation was a particularly serious problem and reached an official rate of 44.38% in 2024, which is lower than 2023 but still quite high, however independent economists and academics claim that the 'real' inflation rate was 83.40%.⁶⁰³ This not only affected refugees in terms of the spending power of the allowance received, but also the general situation in the country, thus, contributing negatively to anti-refugee sentiment. According to a 2024 global survey conducted with 33,197 adults across 52 countries that presents the findings from an Ipsos and UNHCR global survey for World Refugee Day 2024, respondents in Türkiye ranked first in disagreeing with the statement "Refugees make a positive contribution to my country," with 78% expressing disagreement. Additionally, 77% agreed with the view that Türkiye should entirely close its borders to refugees. Only 37% identified a refugee as a person who seeks and is granted asylum by the Turkish government. Furthermore, 83% believed that Türkiye has accepted more refugees than it should. A majority of respondents also perceived refugees to have a negative impact on various aspects of national life: 68% on the labour market, 70% on the national economy, 76% on culture and way of life, 76% on public services such as healthcare, education, and housing, and 74% on national security.⁶⁰⁴

However, according to two other surveys conducted in 2024, when asked to rank their most pressing problems, Turkish respondents no longer listed refugees among their top concerns.⁶⁰⁵

3. Reduction or withdrawal of reception conditions

Indicators: Reduction or Withdrawal of Reception Conditions

1. Does the law provide for the possibility to reduce material reception conditions? Yes No
2. Does the law provide for the possibility to withdraw material reception conditions? Yes No

For applicants who "fail to comply with the obligations listed in Article 90(1)" or "about whom a negative status decision was issued", the PMM has the discretion to reduce rights and benefits, with the exception of education rights for minors and basic health care.⁶⁰⁶

⁶⁰⁰ Information provided by a stakeholder, May 2023.

⁶⁰¹ Information provided by a stakeholder, May 2025.

⁶⁰² Information provided by a stakeholder, May 2025.

⁶⁰³ BBC Türkçe, 2023'te yıllık enflasyon TÜİK'e göre yüzde 64, ENAG'a göre yüzde 127, available [here](#).

⁶⁰⁴ Ipsos, World Refugee Day Global Attitudes Towards Refugees, June 2024, available [here](#)

⁶⁰⁵ Konda, Konda Barometresi 2024 Almancağı, available [here](#); Asal Araştırma, X (Twitter), 26.05.2025, available [here](#).

⁶⁰⁶ Article 90(2) LFIP.

Article 90(1) LFIP lists the obligations of international protection applicants as follows:

- (a) Report changes in their employment status to the competent PMM Directorate within 30 days;
- (b) Report changes in their income, real estate and valuables in their belonging within 30 days;
- (c) Report changes in their residence, identity data and civil status within 20 days;
- (d) Refund in part or in full costs incurred where is identified after the fact that he or she has benefited from services, assistance and other benefits although he or she actually did not fulfil the criteria;
- (e) Comply with any other requests by the PMM within the framework of various procedural obligations listed in the LFIP for applicants.

Failure to report to the assigned “province of residence” (see [Freedom of Movement](#)) may also lead to restrictions on rights and benefits, with the exception of education and health care.⁶⁰⁷ However, if the application is considered withdrawn (“cancelled”), General Health Insurance (*Genel Sağlık Sigortası*, GHI) is also de-activated.

There were changes to the LFIP in December 2019. Article 89(3)(a) LFIP now provides that access to health care under Türkiye's General Health Insurance (*Genel Sağlık Sigortası*, GHI) is provided to applicants for international protection one year after the registration of their application, with the exception of persons with special needs. The right to health care ceases upon the issuance of a negative decision.⁶⁰⁸

The PDMM is responsible and authorised for making the assessment regarding an applicant's eligibility for GHI coverage. It must be deduced that the decision to request an applicant to refund part or all health care expenses incurred for him or her shall be made in accordance with the same financial means criteria.

According to Article 90(2) LFIP, the decision to reduce or withdraw rights and benefits must be based on a “personalised assessment” by the competent PDMM. The applicant must be notified in writing. Where he or she is not being represented by a lawyer or legal representative, the legal consequences of the decision as well as the available appeal mechanisms must be explained to him/her.

Applicants can either file an administrative appeal against such a decision to reduce or withdraw reception rights with IPEC within 10 days of the written notification, or they can directly file a judicial appeal with the competent Administrative Court within 30 days.⁶⁰⁹

4. Freedom of movement

Indicators: Freedom of Movement

1. Is there a mechanism for the dispersal of applicants across the territory of the country?
 Yes No
2. Does the law provide for restrictions on freedom of movement? Yes No

4.1. The “province of residence” system⁶¹⁰

Each applicant is assigned to a province, where he or she shall register with the PDMM, secure private accommodation by their own means and stay there as long as they are subject to international protection, including after obtaining status. This dispersal scheme is based on Article 71 LFIP, according to which the PMM rarely refers an applicant to a Reception and Accommodation Centre but generally to take up private residence in an assigned province.

⁶⁰⁷ Article 91(6) RFIP.

⁶⁰⁸ Law No 7196 amending several acts, 6 December 2019, available in Turkish [here](#)

⁶⁰⁹ Article 80 LFIP.

⁶¹⁰ As per PMM Circular No. 2022/01 dated 06.06.2022, the term “province of residence” (ikamet ili) is now officially used to designate the province in which an asylum seeker is required to reside, replacing the previously used term “satellite city.” Given that individuals may not always live in the province where they are officially registered, this term can also be interpreted as referring to the province of registration.

The RFIP elaborates the dispersal policy. It defines the concept of “satellite cities” as provinces designated by PMM where applicants for international protection are required to reside.⁶¹¹ While new applicants for international protection can initiate their application in a province not listed in the list and may remain there until they are assigned and referred to a satellite city.⁶¹² Stakeholders reported that PMM appeared to have stopped using the concept of “satellite cities” by the end of 2022. See: ([Applications on the territory](#))

According to the latest notice, the number of distinct remains the same, but the number of cities increased to 63.⁶¹³ According to the last available list, 62 provinces in Türkiye were listed as open/closed cities for the referral of international protection applicants.⁶¹⁴ However, they are mostly closed to international protection applications.⁶¹⁵

Open / closed cities for international protection applicants			
Adana	Çorum	Karaman	Sakarya
Adıyaman	Denizli	Kars	Samsun
Afyon	Düzce	Kastamonu	Siirt
Ağrı	Elazığ	Kayseri	Sinop
Aksaray	Erzincan	Kırıkkale	Şanlıurfa
Amasya	Erzurum	Kırşehir	Sivas
Ardahan	Eskişehir	Kilis	Şırnak
Artvin	Gaziantep	Konya	Tokat
Balıkesir	Giresun	Kütahya	Trabzonistan
Batman	Gümüşhane	Malatya	Uşak
Bayburt	Hakkâri	Manisa	Van
Bilecik	Hatay	Mardin	Yalova
Bolu	Iğdır	Mersin	Yozgat
Burdur	Isparta	Nevşehir	Zonguldak
Çanakkale	Kahramanmaraş	Niğde	
Çankırı	Karabük	Ordu	

In practice, however, not all provinces are available to applicants. It is up to the individual PDMM to decide on the ‘opening’ or ‘closing’ of the cities and on referrals there to depending on their capacity. When a PDMM is ‘closed’, it usually processes existing applications to issue International Protection Application Identification Cards and Temporary Protection Identification Cards. The ‘closure’ or ‘opening’ of a PDMM is not officially or publicly notified.

The regulation of the “satellite city” system is not based on publicly available criteria, nor is there an official decision taken in respect of each applicant. In general, metropolises and border cities do not usually figure among satellite cities. According to stakeholders, the concept of “satellite cities” was abandoned in 2023,⁶¹⁶ while currently it is referred to as “province of residence”. However, it remains unclear whether this reflects a specific policy change, or rather just a change in the terminology officially adopted.

Since there is only one operational Reception and Accommodation Centres with a capacity of 100 places, currently almost all international protection applicants are in self-financed private accommodation in their assigned provinces.

⁶¹¹ Article 2(hh) RFIP.

⁶¹² Article 66(3) RFIP.

⁶¹³ PMM, “İstanbul’da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı” İddialarına İlişkin Basın Açıklaması, 16 July 2023, available [here](#).

⁶¹⁴ For the earlier list of cities as of August 2017, see Refugee Rights Türkiye, *Avukatlar için mülteci hukuku el kitabı*, August 2017, available in Turkish [here](#), 409.

⁶¹⁵ Information provided by a stakeholder, June 2023.

⁶¹⁶ Information provided by stakeholders, Macrh – April 2024.

Since PMM took over the registration process there is no official list of open and closed cities for registration of Syrians and non-Syrians but stakeholders can receive information upon request from the PDMM. The situation also changes according to capacity⁶¹⁷.

It is prohibited by PMM for any region or area in Türkiye to have a population of foreign nationals that is more than 20% of the total population. The rate, which was 25% in 2022, was reduced to 20% in 2023. This includes both people who have made Türkiye their permanent home and those who are merely visiting the country. As of July 2023, 1,169 neighbourhoods in 63 different provinces are now closed to foreign nationals seeking address registrations for temporary protection, international protection, and residence permits, as well as changes to their city of residence if they are foreign nationals with residence permits or are under temporary or international protection, with the exception of new-borns, instances of nuclear family reunification, accessing to higher education and foreigners with Turkish Descent. Because of this, no non-Turkish national will be able to select any of these 1,169 neighbourhoods in Türkiye as their registered address for official matters, nor will they be able to ask the authorities to change their address to any of these places. Many neighbourhoods in the metropolitan cities such as **Adana, Ankara, İstanbul, İzmir, Muğla, and Antalya** fall into this category.⁶¹⁸ In practice, individuals who were already residing in a neighbourhood that had been closed to the registration of foreign nationals were allowed to continue living there. Moreover, they were permitted to move to another apartment within the same neighbourhood, despite the area being officially closed to new foreign registrations.⁶¹⁹

Following changes to the LFIP in December 2019, the law now foresees an administrative fine for those who provide accommodation to unregistered foreigners even unknowingly. In 2022, property owners who provided housing to undocumented foreigners without a contract were subjected to fines of 26,750 TRY. If the property is sealed for three consecutive months, it may be done so permanently. If the same act is repeated by a hotel, the hotel may be sealed for up to three months and its certificate may be revoked. In 2022, police operations were widespread in Istanbul, where 13,648 homes were inspected and 684 of them were fined 19,800 TRY for violating article 9 of the Identity Notification Law No. 1774.⁶²⁰

4.2. Travelling outside the “province of residence” and sanctions

The PDMM has the authority to impose an obligation on applicants to reside in a specific address, as well as reporting duties.⁶²¹ In practice, applicants are not subject to strict reporting requirements, but their effective residence in the address declared to the PDMM is monitored if they do not appear before the PDMM for prolonged periods. In this case, the PDMM might conduct unannounced checks.

Any travel outside the assigned province is subject to written permission by the PDMM and may be permitted for a maximum of 30 days, which may be extended only once by a maximum of 30 more days.⁶²²

As of November 2019, travel permits could be obtained through the online system (E-Devlet) through refugees' e-accounts. Refugees are expected to get a password from National Postal Services. In 2024, some people continued to have difficulties in accessing the online system still due to language barriers.⁶²³ It was also reported that only 30-day travel permits could be obtained online. The applicant ought to contact PDMM for permits exceeding 30 days.⁶²⁴ In 2024, despite ongoing challenges related to digital literacy, individuals were able to obtain travel permits through the E-Devlet system, particularly for reasons related to health, employment, or education. Requests based on less critical grounds were generally not considered eligible for travel authorization.⁶²⁵

⁶¹⁷ Information provided by stakeholders, Macrh – April 2024.

⁶¹⁸ PMM, 'Neighbourhood Closure Announcement, 30 June 2022, available in Turkish [here](#) & PMM, "İstanbul'da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı" İddialarına İlişkin Basın Açıklaması, 16 July 2023, available [here](#).

⁶¹⁹ Information provided by a stakeholder May 2025.

⁶²⁰ Milliyet, 'Kaçak göçmenlere ev kiralayan yandı!', 1 April 2022, available in Turkish [here](#).

⁶²¹ Article 71(1) LFIP.

⁶²² Article 91(1)-(2) RFIP.

⁶²³ Information provided by a stakeholder, May 2023.

⁶²⁴ Information provided by a stakeholder, May 2023.

⁶²⁵ Information provided by a stakeholder, May 2025.

Failure to stay in an assigned province has very serious consequences for the applicant. International protection applicants who do not report to their assigned province in time or are not present in their registered address upon three consecutive checks by the authorities are considered to have implicitly withdrawn their international protection application.⁶²⁶ In practice, if the person is not found at their declared address, the PMM may issue a “V71” code declaring that the applicant is in an “unknown location” (*Semt-i meçhul*) following a residence check.

Furthermore, applicants’ access to reception rights and benefits provided by the LFIP are strictly conditional upon their continued residence in their assigned province. The International Protection Applicant Identification Card is considered valid documentation only within the bounds of the province where the document was issued. They may also be subject to [Reduction or Withdrawal of Reception Conditions](#) if they fail to stay in their assigned satellite city.

In practice, however, applicants may be subject to even more severe – and arbitrary – sanctions such as administrative detention in a Removal Centre,⁶²⁷ with a view to their transfer to their assigned province (see [Grounds for Detention](#)). It seems, however, that the rigour of sanctions for non-compliance with the obligation to remain in the assigned province varies depending on the nationality, sexual orientation or gender identity or civil status of the applicant (e.g. single woman) or simply due to the working relationship of the applicant with the PDMM staff. Afghan applicants, for example, often face stricter treatment than other groups. Even where released from Removal Centres after being detained for non-compliance with the obligation to reside in their assigned province, asylum seekers are often required to regularly report to the Removal Centre or to a PDMM in a different province from the one where they reside.

It is possible for applicants to request that PMM assign them to another province on grounds of family, health or other reasons.⁶²⁸ Requests for a change in assigned province for other reasons may be granted by the PMM Headquarters on an exceptional basis. Where an applicant is unhappy about their province of residence assignment and their request for reassignment is denied, he or she can appeal this denial by filing an administrative appeal with the IPEC within 10 days or filing a judicial appeal with the competent Administrative Court within 30 days.

Registration in another city, so non-compliance with the obligation to remain in the assigned province, is one of the most common reason to be targeted by the Mobile Migration Points, when a refugee who resides in another city than their registered/assigned city without a travel permit is identified, they are invited to go to the city where they registered in, or to the removal centres, they might face the fear of deportation.⁶²⁹

Stakeholders reported that in 2024, individuals who failed to comply with their reporting obligations or travelled outside their province of residence were subjected to an administrative fine (*idari para cezası*) of 6,425 TL and issued the N-169 Restriction Code for "Failure to Comply with Administrative Obligations Determined by the Ministry" (*Bakanlıkça Belirlenen İdari Yükümlülüklerle Uymama*). Although these fines were incorporated into the LFIP in 2019, they had not been widely enforced until recently.⁶³⁰

In 2024, an Afghan applicant originally residing in İzmir was reassigned to Kayseri, and a Congolese applicant to Giresun, following changes in their designated provinces of residence. Both had initially settled in İzmir with support from NGOs and had managed to secure housing. However, upon being instructed to relocate, their requests for additional time were denied. In the Afghan applicant’s case, her lawyer approached Kayseri PDMM to obtain the legal notification of the 'deemed withdrawn' decision, but recalling a 2023 incident where an applicant was detained under similar circumstances, they instead challenged the decision in administrative court. The objection highlighted the difficulties asylum seekers face in relocating—such as terminating rental agreements, securing new housing, and covering associated costs—particularly in the first six months during which they are not permitted to work legally. Despite these arguments, the court dismissed the economic and practical concerns and rejected the case. The same outcome was observed in the Congolese applicant’s case. In both instances, the applicants were ultimately

⁶²⁶ Article 77(1)(ç) LFIP.

⁶²⁷ Information provided by several stakeholder, May 2023.

⁶²⁸ Article 110(5) RFIP.

⁶²⁹ Information provided by stakeholders, March – April 2024.

⁶³⁰ Information provided by a stakeholder, February 2025.

deemed to have withdrawn their international protection applications solely due to their inability to comply with the relocation order under restrictive conditions⁶³¹.

B. Housing

1. Types of accommodation

Indicators: Types of Accommodation

1. Number of reception centres:⁶³² 1
2. Total number of places in the reception centres: 100
3. Total number of places in private accommodation: Not available
4. Type of accommodation most frequently used in a regular procedure:
 Reception centre Hotel or hostel Emergency shelter Private housing Other
5. Type of accommodation most frequently used in an accelerated procedure:
 Reception centre Hotel or hostel Emergency shelter Private housing Detention

One of the most prominent shortcomings of Türkiye's legal framework for asylum is the failure to commit to providing state-funded accommodation to asylum applicants. Article 95(1) LFIP clearly establishes that as a rule, international protection applicants and status holders shall secure their own accommodation by their own means. Neither the LFIP nor the RFIP indicate any plans to offer international protection applicants financial assistance to cover housing expenses.

The PMM is authorised to set up Reception and Accommodation Centres to be used to address “accommodation, nutrition, health care, social and other needs” of international protection applicants and status holders.⁶³³ The Reception and Accommodation Centres referred to in Article 95 LFIP should not be confused with the “temporary accommodation centres”, the large-scale camps in the south of Türkiye that accommodate refugees from Syria subject to the temporary protection regime (see [Temporary Protection: Housing](#)).

There is only one remaining Reception and Accommodation Centre in operation in the province of **Yozgat** with a modest capacity of 100 places.⁶³⁴ The centre is envisioned as a short-stay facility, where persons apprehended and wishing to apply for international protection may be hosted for a couple of days before being directed to register their application. In practice, these centres are mainly available to applicants with special needs such as victims of gender-based violence, torture or physical violence, single women, elderly and disabled people. According to the TIHEK report, the foreigners who have stayed the longest in the facility include a Syrian woman and her two children who were admitted in 2011.⁶³⁵

In emergencies involving urgent cases, NGOs including IOM and Turkish Red Crescent community centres may be able to arrange short-term hotel accommodation for individual applicants with special needs, depending on their available resources. However, this support is generally limited to those who are unable to secure housing through employment or family networks. For example, single men or families with an able-bodied male household member are typically excluded. NGOs also assess whether applicants have other sources of support, such as relatives living abroad.

Unaccompanied minors are generally not eligible for such accommodation support, as NGOs consider it too risky to place them without a legal guardian in a separate house or hotel. Due to recent funding cuts,

⁶³¹ Information provided by a stakeholder, April 2025.

⁶³² Both permanent and for first arrivals.

⁶³³ Article 95(2) LFIP.

⁶³⁴ Human Rights and Equality Commission of Türkiye, ‘Visit to Yozgat Reception and Accommodation Centre’, 15 June 2022, available [here](#).; Yeniufuk, Kabul ve Barınma Merkezi’ne ziyaret, 19.12.2024, available [here](#).

⁶³⁵ Ibid.

NGO resources have become extremely limited. In most cases, they can only provide hotel accommodation for a few days or, in exceptional circumstances, cover the cost of a first month's rent.

In practice, eligibility for accommodation support and the criteria for assessing vulnerability often depend on the funding source of the institution. While some providers strictly limit support to the most vulnerable individuals—such as single women or survivors of gender-based violence—others may also extend assistance to single men.⁶³⁶ For these reasons, NGOs have continue to advocate for the establishment of Reception and Accommodation Centres rather than further investment in additional Removal Centres. International protection applicant women can access women's shelters (See: [Women and girls under temporary protection](#)) and children can access to Child Support Centres (CODEMs). Women's shelters provide temporary accommodation for women at risk and their children under the age of 12. Children over the age of 12 are placed in dormitories affiliated with the General Directorate of Child Services after the necessary examination. Even though children need to leave the shelters when they turn to 18, the implementations might be flexible for specific cases considering any specific vulnerabilities or for education reasons.

The Municipality of Istanbul operates several guesthouses. One of them, located at the main coach station in Esenler, offers temporary accommodation for up to two weeks, but only to individuals who possess valid ID cards and, if registered in a province other than Istanbul, valid travel permits. Another facility - a winter shelter that previously provided temporary accommodation stopped accepting foreigners in 2024.⁶³⁷

2. Conditions in reception facilities

Indicators: Conditions in Reception Facilities

1. Are there instances of asylum seekers not having access to reception accommodation because of a shortage of places? Yes No
2. What is the average length of stay of asylum seekers in the reception centres? Not available
3. Are unaccompanied children ever accommodated with adults in practice? Yes No

As elaborated in the section on [Types of Accommodation](#), the only Reception and Accommodation Centre is in **Yozgat** and has a modest capacity of 100 places. Little is known by civil society about the conditions in the centre. According to latest TIHEK report, overall, the physical conditions in the centre is fine and the centre works under capacity.⁶³⁸

While the current capacity of Reception and Accommodation Centre is extremely limited as compared to the size of the population seeking international protection in Türkiye, Article 95 LFIP and the Regulation on the Establishment of Reception and Accommodation Centres and Removal Centres ("Removal Centres Regulation"), dated 22 April 2014 lay down the parameters for the operation and organisational structure of these facilities and Removal Centres.

"Persons with special needs" shall have priority access to free accommodation and other reception services provided in these facilities.⁶³⁹ Reception services provided in the reception and accommodation centres may also be extended to international protection applicants and status holders residing outside the centres,⁶⁴⁰ although in practice because of the dispersal policy, only applicants registered and residing in the same province as the centre would be able to access any such services.

However, Article 4 of the Removal Centres Regulation provides that a list of 9 general principles must be observed in all functioning and provision in the Centres, including prioritisation of persons with special needs, best interest of the child, confidentiality of personal data, due notification of residents and detainees

⁶³⁶ Information provided by multiple stakeholders, May 2025.

⁶³⁷ Information provided by a stakeholder, May 2025, İBB, Geçici Barınma Merkezi, available [here](#).

⁶³⁸ Human Rights and Equality Commission of Türkiye, 'Visit to Yozgat Reception and Accommodation Centre', 15 June 2022, available [here](#).

⁶³⁹ Article 95(3) LFIP.

⁶⁴⁰ Article 95(4) LFIP.

on the nature and consequences of all proceedings they undergo, respect for right to religious affiliations and worship and non-discrimination.

Currently, almost all international protection applicants pay for private accommodation in their assigned provinces out of their own resources. Access to housing remains deeply challenging due to a range of factors, including high rental prices and advance payment requirements from owners. Rent prices are very high, resulting in two or three families living together in one place to be able to afford rent, sometimes deposits are not paid back when the tenancy contract ends, and there are also some discriminative practices. As a result, a large number of applicants, likely temporary protection beneficiaries (see [Temporary Protection: Housing](#)) remain exposed to destitution and homelessness, or accommodation in substandard makeshift camps.

The economic downturn increased living expenses, including rental fees. This had a larger effect on refugees because of their vulnerability. As of 1 July 2024, the 25% cap on annual rent increases was lifted. Although many refugees were already paying above this threshold due to discriminatory practices in the housing market, the cap had nevertheless served as a baseline protection for some. Following its removal, the official maximum increase rate has risen from 65% to 60% per month for the remainder of the year, further exacerbating the already severe housing affordability crisis faced by the refugee population.⁶⁴¹ In practice, rent increases are much higher than this legal limit. Property owners sometimes threaten refugee tenants with filing a complaint against them if they disagree with a rent increase or refuse to leave the house. The refugees' fear of deportation makes them especially vulnerable to these threats.⁶⁴² Despite limited resources, when NGOs agree to provide rental support to individuals, additional challenges may arise in practice. For example, some NGOs are only able to deliver this support by transferring the funds directly to the landlord's bank account. However, certain landlords may be unwilling to share their banking details—often due to a preference for receiving rent in cash without formal documentation. As a result, even when an institution approves rental support, the assistance may not be delivered due to the financial regulations imposed by donors⁶⁴³.

Another significant obstacle arises when an individual's international protection application is permanently rejected, or their temporary protection status is cancelled. While awaiting the issuance of a deportation order, they often remain without valid identification documents. In such cases, if conflicts emerge with their landlords, they are typically compelled to comply with the landlord's demands—regardless of fairness—because they know that relocating would be extremely difficult. Without valid ID, they are unable to sign a new rental contract or register utilities such as electricity, water, or gas in their name. This situation leaves them highly vulnerable to exploitation and housing insecurity.⁶⁴⁴

Another obstacle affecting applicants' accommodation stems from marginalisation from local communities or other refugee populations, whereby people are forced to live in districts far from the city centre, hospitals, education centres and public buildings. Although the types of challenges vary depending on the province and the profile of the applicant, the most common problems of finding a suitable place to live are decreased possibilities due to the closed neighbourhoods, reluctance of homeowners to rent their houses to refugees due to increased anti-migrant discourse and discrimination, high rent prices, unrealistic payment conditions (such as paying an annual rent), and poor housing conditions⁶⁴⁵. For instance, due to pervasive racism, applicants of African descent appear to be more discriminated when searching for accommodation. They primarily reside in shared residences.⁶⁴⁶ In **Istanbul**, an increasing number of Afghans have settled in Küçüksu and Yenimahalle⁶⁴⁷ and Zeytinburnu.⁶⁴⁸ In **Adana** and **Mersin**, they mostly live in rural areas under precarious conditions together with Syrians.⁶⁴⁹ (see [Content of Temporary Protection Housing](#)).

⁶⁴¹ Information provided by a stakeholder, March 2025.

⁶⁴² Information shared by stakeholder, March – April 2024.

⁶⁴³ Information provided by a stakeholder, May 2025.

⁶⁴⁴ Information provided by a stakeholder, May 2025.

⁶⁴⁵ Information shared by stakeholders, March- April 2024.

⁶⁴⁶ Burgün, 'Esenyurt'u 'yurt' edinen göçmenlerin öyküsü: Kimsesizler mezarlığına gömülmek istemiyoruz', 27 July 2022, available in Turkish [here](#).

⁶⁴⁷ Information provided by a stakeholder, May 2023.

⁶⁴⁸ Information provided by a stakeholder, May 2023.

⁶⁴⁹ Information provided by a stakeholder, May 2023.

Recent research⁶⁵⁰ conducted in the districts of Istanbul where high numbers of migrants, especially asylum seekers and refugees, reside shows that three key factors support the spatial segregation of vulnerable migrant groups are the availability of affordable housing, effective migrant networks, and opportunities for informal employment. The visible presence of large groups of migrants in public spaces has caused unease among citizens, highlighting the tensions related to urban inequalities and the sharing of public resources. Recent enforcement measures, such as mobile migration points, have led to a shift in the presence of migrants in Istanbul, resulting in their increased invisibility rather than a real numerical decline.⁶⁵¹

According to recent findings, the majority of refugees were forced to relocate following the earthquake. While those under temporary or international protection status were generally restricted from leaving their registered provinces without government permission, this travel ban was temporarily lifted for those registered in the six most affected provinces. This led many to move to urban centres elsewhere in Türkiye, and some to travel temporarily to Northwest Syria.⁶⁵² Despite relocation, refugees continue to face rising rents, housing damage, ongoing economic difficulties, and increased discrimination, further complicating access to affordable housing, livelihoods, and essential support services.⁶⁵³

C. Employment and education

1. Access to the labour market

Indicators: Access to the Labour Market

- | | |
|--|---|
| 1. Does the law allow for access to the labour market for asylum seekers?
❖ If yes, when do asylum seekers have access the labour market? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6 months |
| 2. Does the law allow access to employment only following a labour market test? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does the law only allow asylum seekers to work in specific sectors?
❖ If yes, specify which sectors: | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Does the law limit asylum seekers' employment to a maximum working time?
❖ If yes, specify the number of days per year | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 5. Are there restrictions to accessing employment in practice? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Asylum seekers may apply for a work permit after 6 months following the lodging date of their international protection application.⁶⁵⁴

The principles and procedures governing the employment of applicants or international protection beneficiaries shall be determined by the Ministry of Family, Labour and Social Services in consultation with the Ministry of Interior.⁶⁵⁵ On that basis, the Regulation on Work Permit of Applicants for International Protection and those Granted International Protection adopted on 26 April 2016 confirms that applicants may apply to the Ministry of Family, Labour and Social Services for a work permit through an electronic system (*E-Devlet*) after 6 months from the lodging of their asylum application.⁶⁵⁶

⁶⁵⁰ GAR, İstanbul İlçelerinde Kent ve Göç İlişkileri, Rapor no: 9, Nisan (April) 2024.

⁶⁵¹ Information provided by stakeholders, March – April 2024.

⁶⁵² Heinrich Böll Stiftung, Depremlerin Türkiye'yi vurmasının üzerinden bir yıl geçti, mülteciler daha da derin bir çukurda, 06.02.2024, available [here](#).

⁶⁵³ Mixed Migration Centre (2023) Türkiye Syria earthquake's impact on Afghan, Iranian, Iraqi and Somali refugees in Türkiye. Available [here](#).

⁶⁵⁴ Article 89(4)(a) LFIP.

⁶⁵⁵ Article 89(4)(ç) LFIP.

⁶⁵⁶ Articles 6-7 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

These jobs cannot be performed by foreigners, according to article 9/1 (c) of the International Workforce Law: a) dentist, b) chemist, c) veterinarian, d) executive director at private health institutions, e) lawyer, f) notary, g) private guard, h) captain and similar jobs performing at sea, i) custom auditor, l) tourist guide.⁶⁵⁷

Applicants must hold a valid identification document in order to apply,⁶⁵⁸ meaning that those applicants who do not hold an International Protection Identification Card – due to [Admissibility](#) grounds or the applicability of the [Accelerated Procedure](#) – are not permitted to apply for a work permit. In any event, it would be difficult for these categories of applicants to obtain a right to access the labour market given the general 6-month waiting period to apply for a work permit.

An exemption from the obligation to obtain a work permit is foreseen for the sectors of agriculture and livestock works. In these cases, however, the applicant must apply for an exemption before the relevant Provincial Directorate of Family, Labour and Social Services.⁶⁵⁹ The Ministry of Family and Social Services may introduce province limitations or quotas in these sectors.⁶⁶⁰ More generally, the Regulation entitles the Ministry to impose sectoral and geographical limitations to applicants' right to employment, without providing further detail as to the applicable grounds for such restrictions.⁶⁶¹ In addition, applicants cannot be paid less than the minimum wage.⁶⁶²

In the Cohesion Strategy and National Action Plan (2018-2023)⁶⁶³ priorities for the labour market, include:

- Providing reliable and standardised information on labour market;
- Research on professional qualifications of migrants and access to the labour market;
- Protection of right to work as well as information on rights and working conditions.

The action plan includes:

- A website with information on conditions for access to the labour market depending on status;
- Awareness raising on rights and working conditions;
- Strengthening recognition of migrants' qualifications.

The International Workforce Law's implementing regulation went into effect on 2 February 2022, and it covers the procedures for work permits and work permit exemptions. The Regulation encourages policymakers to consider the perspectives of both international and domestic workforce when developing standards⁶⁶⁴. The number of work permits increased in 2024, comparing to the previous years. In 2024, a total of 300,852 work permits were issued, including 87,361 for women. In 2023, 17,785 citizens of Russia, 3,368 citizens of Ukraine, 6,204 citizens of Afghanistan, 3,915 citizens of Iraq, 8,521 citizens of Iran, 1,902 citizens of Pakistan obtained work permit, other top nationalities are Uzbekistan, Kazakhstan, and Kyrgyzstan.⁶⁶⁵ In 2024, 17,267 citizens of Russia, 3,464 citizens of Ukraine, 8,335 citizens of Afghanistan, 4,971 citizens of Iraq, 10,466 citizens of Iran, 32,276 citizens of Turkmenistan obtained work permit, other top nationalities are Azerbaijan, Indonesia, India, Kazakhstan, Kyrgyzstan and Uzbekistan. There is ongoing work to ease procedures, make them more accessible, and reduce the number of people dependent on aid.⁶⁶⁶

The Regulation also foresees the possibility for applicants to have access to vocational training schemes organised by the Turkish Job Agency (İŞKUR).⁶⁶⁷ In practice, Public Education Centres and İŞKUR offer vocational courses to asylum seekers in many localities. Between the first quarter and the end of 2022, İŞKUR registered nearly 10,000 additional refugees, bringing the total to nearly 72,000 (significantly

⁶⁵⁷ Article 9/1 (c) of the Internal Workforce Law no. 6735, available [here](#). For more information, available [here](#).

⁶⁵⁸ Article 6(1)-(2) Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

⁶⁵⁹ Article 9(1) Regulation on Work Permit for Applicants for and Beneficiaries of International Protection. Provisionally, however, these applications are lodged with the Ministry of Family and Social Services: Provisional Article 1 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

⁶⁶⁰ Article 9(2) Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

⁶⁶¹ Article 18(1) Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

⁶⁶² Article 17 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

⁶⁶³ See PMM, Uyum Strateji Belgesi ve Ulusal Eylem Planı 2018-2023, available in Turkish [here](#).

⁶⁶⁴ Resmî Gazete, Uluslararası İşgücü Kanunu Uygulama Yönetmeliği, 2022, available in Turkish [here](#).

⁶⁶⁵ Ministry of Labour and Social Security, 'Work Permits of Foreigners', 2023, available [here](#).

⁶⁶⁶ Ministry of Labour and Social Security, Work Permits of Foreigners, 2024, available [here](#); Information provided by stakeholders, March-April 2024.

⁶⁶⁷ Article 22 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

exceeding the target of 63,300). İŞKUR also reported that an additional 425 beneficiaries (refugees and members of the host community) secured formal employment through them under the Facility, bringing the total number of beneficiaries to over 18,000. 67% of these were male, while 33% were female.⁶⁶⁸ 31,053 migrants accessed to vocational trainings organised by Directorate General for Lifelong Learning, in addition, between 2014 and 2023, a total of 846,987 (excluding Syrians) migrant trainees attended courses held in public education centres⁶⁶⁹

Specific groups are concentrated in certain work areas. For instance, it was reported that Ukrainians in Türkiye work in the beauty, housekeeping, and babysitting industries, as well as informal service sectors,⁶⁷⁰ and Afghans often work in shepherding, animal care agricultural production and textile especially in Istanbul.⁶⁷¹ Highly educated international protection applicants or holders often face challenges in securing jobs that match their educational qualifications.⁶⁷²

Applicants for international protection continue to face widespread undeclared employment and labour exploitation in Türkiye, similar to temporary protection beneficiaries (see [Temporary Protection: Access to the Labour Market](#)). The economic crisis in Türkiye, which began with the pandemic and deepened especially in 2023, along with rising unemployment and the high cost of living due to high inflation rates, have made access to labour markets more difficult. Refugee labour constitutes the cheapest segment of the labour market, leading labour-intensive industries to rely on informal labour, this situation increases the vulnerability of migrant workers, at the same time it causes migrant labour to be viewed as a competitive threat by the unemployed locals.⁶⁷³ With increased inspections of workplaces, employers are becoming less willing to hire migrant workers, and these workers without holding work permits are increasingly afraid to go to their workplaces due to fears of deportation.⁶⁷⁴ Asylum seekers who work without work permit are listed in the law among those against whom deportation decisions will be taken; the time limit to access labour market and reluctance of employers to apply for work permits for asylum seekers might cause the deportation of asylum seekers who work without a work permit. All these issues contribute to a rise in child labour. In 2024, ID checks intensified to such an extent that, during certain periods, many men preferred to remain at home, while women and children continued to go out to work. This was primarily because men were more frequently subjected to identity checks by authorities.⁶⁷⁵

According to research conducted by Türk Kızılay,⁶⁷⁶ the provinces with the highest number of child workers are İstanbul, Gaziantep, Adana, İzmir, and Kahramanmaraş due to high density of workshops and the largest settled migrant populations. There is a high concentration of migrant children working in shoe making and seasonal agricultural fields in Gaziantep, in furniture-making facilities, carpentry shops, and the automotive service sector in Ankara, in textile workshops and seasonal agricultural labour in Adana, in shoemaking and textile workshops in İzmir and in İstanbul. There are migrant children working on the streets with their family members doing daily jobs such as scrap dealing, vending, selling paper tissue and collecting paper. Kızılay Mobile Teams provide child friendly spaces and psychosocial support services in more than 60 tent areas in provinces where seasonal agricultural workers often reside (Gaziantep, Adana, Mersin, Zonguldak etc.).

Poor health and safety conditions at work are also a matter of concern. Workers' Health and Safety Watch (İşçi Sağlığı ve Güvenliği Meclisi) is monitoring workplace homicides, including those of refugees and migrants. In 2024, 94 refugee and migrant workers lost their lives. These included 49 Syrians, 13 Afghans, 5 Iranians, 5 Russians, 5 Turkmens, 3 Iraqis, 3 Uzbeks, 2 Ukrainians, and one individual each from Andorra,

⁶⁶⁸ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 11, June 2023, available [here](#)

⁶⁶⁹ Hayat Boyu Öğrenme Genel Müdürlüğü 2023 Yılı Birim Faaliyet Raporu: available [here](#)

⁶⁷⁰ Information provided by a stakeholder, March 2023.

⁶⁷¹ Information provided by stakeholders, March 2024 and May 2025.

⁶⁷² Informayion provided by stakeholders, March – April 2024.

⁶⁷³ Heinrich Böll Stiftung, Göçmen Mahallelerinde Yaşam: Türkiye'de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı, November 2023, available [here](#).

⁶⁷⁴ Information provided by stakeholders, March-April 2024.

⁶⁷⁵ Information provided by multiple stakeholders, April and May 2025.

⁶⁷⁶ Turkish Red Crescent, Türkiye - The Effects of Irregular Migration on Child Labor: The Situation of Migrant Children in Türkiye – 2024, available [here](#).

Algeria, China, Georgia, Kyrgyzstan, Egypt, Poland, and Sudan.⁶⁷⁷ In December 2022, it was reported that 828 migrants lost their lives between 2013 and 2022 and 51% of the victims were Syrians. The most cases were reported from Istanbul (148), Sanliurfa (105), Konya (51) Gaziantep (48), Kocaeli (35), Ankara (30), agriculture, and constructions sectors sector were identified as the most dangerous sectors with a 29% and 25% homicide rate in 10 years.⁶⁷⁸ Refugee workers lost their lives in work-related accidents including as a result of fires, equipment failure and road accidents.⁶⁷⁹ An Afghan national, who was working in an illegal mine operating in Zonguldak's Kilimli district, was killed by his bosses.⁶⁸⁰ Subsequently, it was revealed that one of his kidneys was missing; however, the maximum sentence imposed was only five years and eight months.⁶⁸¹

The Directorate General of International Labour has announced the updated administrative fines for foreigners working without a work permit in 2023.⁶⁸² Employers hiring foreigners without a work permit face an administrative fine of 56,752.00 TL per foreigner. Foreigners working without a dependent work permit will be fined 22,688.00 TL, and those working independently without a work permit will be fined 45,406.00 TL. In practice, since working without a permit is a ground for the issuance of a deportation order, individuals are more likely to be placed in a removal centre than to receive an administrative fine. In one case reported in 2024, a woman who attempted to report workplace harassment was warned by police officers that if the incident were officially recorded, she—as someone working without a permit—would be sent to a removal centre. As a result, she chose not to pursue the complaint.⁶⁸³

There are some projects addressing several issues regarding the financial literacy, providing information on labour rights, trainings, and digital solutions. Financial literacy training was given to 6,708 trainees with the project implemented in the Public Education Centres in Ankara, Istanbul, Bursa, Konya and Gaziantep, "Micro Business Game Training" and "Accumulation Game Training" course programs were created in the e-system, and information technologies classes were established in 4 public education centres.⁶⁸⁴ "Towards an Inclusive Workplace for Refugees Project" implemented by ASAM in 6 provinces (Adana, Bursa, Istanbul, İzmir, Mersin and Kahramanmaraş) creates an application called "Communication & Inclusion" (ComIn). The application aims to make the relevant training easily accessible to both workers and employers, regardless of place and time. MUDEM Worker Support Center Project⁶⁸⁵ continues for 6 years provides social and legal counselling and supports people working in the garment sector in Türkiye, the most common issues among the received notifications are related to salaries, mistreatment at work, and work permits.

The Migrant Worker Health Center, established in 2022 by Istanbul Metropolitan Municipality, informs foreign migrant workers about labour laws and occupational health and safety to ensure legal and safe working conditions. It provides education, consultancy, and conducts research on social and economic issues related to migrant workers in Istanbul. The centre does not offer medical services.⁶⁸⁶

2. Access to education

Indicators: Access to Education

1. Does the law provide for access to education for asylum-seeking children? Yes No
2. Are children able to access education in practice? Yes No

⁶⁷⁷ Isig Meclisi, 'İç cepheyi sağlamaştırma' siyasetinin örtmeye çalıştığı gerçeklerden birisi de iş cinayetleri... 2024 yılında en az 1897 işçi iş cinayetlerinde hayatını kaybetti, 13.01.2025, available [here](#)

⁶⁷⁸ Isig Meclisi, 'Yoksulluğun nedeni sermaye iktidarındır... Son on yılda (2013-2022) en az 828 göçmen/mülteci işçi hayatını kaybetti', 2022, available [here](#).

⁶⁷⁹ Ibid.

⁶⁸⁰ Evrensel, Yakılan işçi Nourtani'nin ailesi: Çalışan tek kişiydi şimdi bize ne olacak?, 23 November 2023, available [here](#).

⁶⁸¹ X (Twitter), İstanbul Barosu Mülteci ve Göçmen Hakları Merkezi, 14.04.2025, available [here](#)

⁶⁸² Uluslararası İşgücü Genel Müdürlüğü - İdari Para Cezaları, available [here](#)

⁶⁸³ Information provided by a stakeholder, May 2025.

⁶⁸⁴ Financial Inclusion of Refugees and Host Communities in Turkey Project, 16 November 2023: available [here](#)

⁶⁸⁵ Worker Support Centre: available [here](#).

⁶⁸⁶ İBB, Göçmen İşçi Sağlığı Merkezi, available [here](#).

International protection applicants and their family members shall have access to elementary and secondary education services in Türkiye.⁶⁸⁷

Türkiye has been a party to the United Nations Convention on the Rights of the Child since 1995. The right to education is also recognised by Article 42 of the Turkish Constitution, which provides that “no one shall be deprived of the right of learning and education”. Türkiye’s Law on Primary Education and Training provides that primary education is compulsory for all girls and boys between the ages of 6-13 and must be available free of charge in public schools.⁶⁸⁸ Currently, the 8-year compulsory primary education is divided into two stages of four years each. Parents or guardians are responsible for registering school-age children to schools on time. Furthermore, the Basic Law on National Education also explicitly guarantees non-discrimination in extension of education services to children, “regardless of language, race, gender, religion”.⁶⁸⁹

For a parent to be able to register their child to a public school, the family must already have International Protection Applicant Identification Cards, which also list the Foreigners Identification Number (YKN) assigned by the General Directorate of Population Affairs to each family member. This YKN registry is a prerequisite for school authorities to be able to process the child’s registration.⁶⁹⁰ However, the Ministry of National Education instructs public schools to facilitate the child’s access to school even where the family has not yet completed their international protection registration process at the PDMM. Children need to attend school in the “satellite city” to which the family has been assigned (see [Freedom of Movement](#)).

Children whose families’ applications for international protection have been denied, and who are subject to deportation orders, are unable to access education. Even when they are in the midst of legal appeals, educational injunctions are not enforced because they lack a legal stay permit or their residential address is not registered.⁶⁹¹ Children cannot technically register again after the family’s application is denied because when a foreigner’s ID number is entered into the electronic system, it indicates that they are not registered. According to the law, the right to education and basic health services should be excluded from this suspension. Practices differ significantly from one province to another. In the past, these children and the children whose family had not completed their applications could attend school as “guest students”. Currently however, in some cities, there is a tendency not to enrol these children in schools to encourage families to register with authorities.⁶⁹² When a family’s international protection application is rejected and their ID numbers become inactive, children may face significant obstacles in school registration. According to stakeholders, if the family has appealed the rejection and the case is still pending, school registration generally proceeds without major issues- provided the child is not transitioning between educational levels (e.g., from primary to secondary or secondary to high school). However, serious problems arise during such transitions. In such cases, even protective measures issued by the children’s courts have reportedly failed to court resolve the registration barriers.

If the family’s application is definitively rejected and they are at risk of receiving a deportation order, school registration becomes impossible regardless of the child’s grade or any existing protection orders. In one case, the İzmir 1st Administrative Court issued a suspension of execution for an Iranian minor whose family’s international protection claim had been definitively rejected despite a protection measure granted by the children’s court. Nonetheless, the education authorities refused to register the child on the grounds that there was no legal basis for the child to remain in Türkiye. According to stakeholders, this ruling was ultimately ineffective, and the family decided to leave the country.

In 2024, the Ministry of Family and Social Services’ General Directorate of Children’s Services circulated an internal notification stating that for applications concerning protective and preventive measures for children of foreign nationals, applicants must obtain valid and up-to-date documents from the provincial

⁶⁸⁷ Article 89(1) LFIP.

⁶⁸⁸ Law No 222 on Primary Education and Training.

⁶⁸⁹ Law No 1738 Basic Law on National Education.

⁶⁹⁰ The specifics of the registration procedure are governed by a 23 September 2014 dated Ministry of National Education Circular No: 2014/21 regarding the Provision of Education and Training Services to Foreign Nationals.

⁶⁹¹ Information shared by stakeholders, March-April 2024.

⁶⁹² Information shared by a stakeholder, March 2024.

migration directorates confirming their legal status in Türkiye, including approved identification details. The notification explicitly emphasized that applications from foreign nationals who do not present proper identification will not be considered for protective measures.⁶⁹³

Where the child has previous educational experiences prior to arrival to Türkiye, they will undergo an equivalence assessment by Provincial Education Directorate to determine what grade would be appropriate for them to enrol. Particularly in cases where the family does not have any documents demonstrating the child's previous schooling, the equivalence determination may prove complicated. Almost in every case, children are placed in classes appropriate to their ages rather than their levels and therefore they might face difficulty to catch up lessons.⁶⁹⁴ For example, even if a twelve-year-old child is illiterate, they would still be enrolled in secondary school solely based on their age, without consideration for their actual educational needs.⁶⁹⁵

As part of the Cohesion Strategy and National Plan, which foresees key issues to be addressed by PMM, education is listed as one of the six focus areas.

Priorities for education include:

- Research why some migrant children miss school or stop attending;
- Improving the continuity of schooling including in formal education;
- Supporting access to higher education;
- Creating more informal programmes of education in line with the needs of migrants.

Plans include:

- A review of the legislative base;
- Increase in capacity of formal education institutions;
- Information activities;
- Training for teachers including on psychological needs of children who may have undergone trauma;
- GEM transition to schools;
- Resources and assistance in libraries;
- Language skills and other courses to fill gaps;
- Post-school study and peer education including with Turkish classmates;
- Awareness raising with families of migrant children;
- Promoting access to pre-school education;
- Assistance for those with breaks in education;
- More higher education opportunities;
- Intercultural programmes at universities;
- Turkish language curriculum for different ages and levels of education;
- Non-formal education opportunities including in libraries, community and municipal centres etc.;
- Mobile libraries in temporary accommodation centres;
- Vocational courses.

Regarding asylum-seeking children with special needs, the Ministry of National Education instructs that where a foreign student is identified to be in need of special education, necessary measure shall be taken in accordance with the Regulation on Special Education Services, which governs the provision of education services to children with physical and mental disabilities.

Children with disabilities, particularly after the earthquake, face significant challenges in accessing special education. These challenges include limited access to services, fees that refugee children with disabilities must pay for education, lack of involvement in decision-making and policy implementation, and insufficient targeted programming, especially in the earthquake-affected areas⁶⁹⁶.

⁶⁹³ Information provided by a stakeholder, May 2025.

⁶⁹⁴ Information shared by a stakeholder, March 2024.

⁶⁹⁵ Information provided by a stakeholder, May 2025.

⁶⁹⁶ Ortak 3RP Koruma Sektörü Çalıştay Raporu, August 2023, available [here](#).

In Türkiye, there were 68,760 Iraqi, 47,118 Afghan, 12,666 Iranian, 7,938 Azerbaijani, and 2,663 German students enrolled in public schools as of March 2022.⁶⁹⁷ As of January 2, 2025, 1,008,625 (79.42%) of the entire foreign population of school age have been included in the education system. Of these students there are 58,056 foreign students in kindergarten, 459,028 in primary school, 329,093 in secondary school, and 162,448 in high school.⁶⁹⁸

3 out of 10 school-age foreign students do not go to school at all, the attendance rate is decreasing dramatically for the children in high school, especially in the 11th and 12th grades⁶⁹⁹. Although the number of children in the 11th and 12th grades is 163,922, the number of children attending school is only 39,168. No official data provides detailed information regarding the status of foreign students who are in the Turkish education system in 2024.

The main reasons why children with international protection applications remain out of schools are (1) economic hardships, which often lead to increased child labour and early marriage cases, (2) peer bullying, (3) being registered in a different province than where they live, (4) discrimination by school administration, teachers, and parents, and (5) insufficient school capacities.⁷⁰⁰ There are schools where separate classes are created for migrant children.⁷⁰¹ Although public schools are free, auxiliary costs such as notebooks, stationary and school uniforms, and transportation cost present a financial burden on parents. School administrations sometimes claim a lack of capacity, even when space is available. Such issues, along with unlawful fee practices, can be addressed through the advocacy efforts of NGOs working in the field.⁷⁰²

According to information gathered from stakeholders, approximately 80% of Ukrainian children attend education in Türkiye. Particularly Ukrainian families view this as an opportunity for their children to acquire a new culture. No significant peer discrimination against Ukrainian students in schools was reported. The school administrations were generally very accommodating. A school in Gölbaşı, Ankara, for instance, assisted numerous Ukrainian families with school registration procedures. To facilitate the social cohesion of Ukrainian families and children, the Ukrainian Culture Association and Cankaya Municipality offered Turkish classes. For children, there were courses in physics, the natural sciences, wellness, etc. There were fewer problems among elementary school students, but families wanted their children going to secondary school to follow the Ukrainian curriculum online.⁷⁰³ The "Back to School Project", implemented by ASAM, supports unaccompanied Ukrainian children in Antalya to ensure their access to the Distance Education System in Ukraine with allocating the computer labs.⁷⁰⁴ In addition, psychosocial and language support are provided to Ukrainian children in Antalya.⁷⁰⁵ Meskhitan Turks residing in container camps in Elazığ have nurseries and elementary schools in the camp and high school students have access to outside education. As of 2024, the suspension of operations by NGOs such as ASAM Antalya, largely due to funding cuts, has further hindered access to updated data on Ukrainian children.

Since the language of education is Turkish, language barriers present a practical obstacle for asylum seeker children. There is no nationwide provision of preparatory or catch-up classes for asylum-seeking children who start their education in Türkiye or who did not attend school for some time due to various reasons. In practice, unaccompanied children who are accommodated in state shelters are offered Turkish language classes provided in the shelters before they are enrolled in schools. For other asylum-seeking children, while in theory, they have access to Turkish classes provided by public education centres or the municipalities in their assigned province, in practice such language classes attuned for them are not universally available around Türkiye.

⁶⁹⁷ DW, 'MEB raporu: Suriyeli çocukların yüzde 35'i okula gidemiyor', 30 March 2022, available [here](#).

⁶⁹⁸ T.C. Milli Eğitim Bakanlığı Hayat Boyu Öğrenme Genel Müdürlüğü, İzleme ve Değerlendirme Raporu 2024, available [here](#).

⁶⁹⁹ Birgun, 21.10.2023, 455 bin yabancı çocuk okula gidemiyor, available [here](#).

⁷⁰⁰ Information provided by stakeholders, March-April 2024.

⁷⁰¹ Information provided by a stakeholder, May 2023.

⁷⁰² Information provided by a stakeholder, April 2025.

⁷⁰³ Information provided by a stakeholder, March 2023.

⁷⁰⁴ ASAM, Okula dönüş projesi, available [here](#)

⁷⁰⁵ Directorate of Communication, 20.06.2023, Turkey has become a safe haven for Ukrainian children who are victims of war (iletisim.gov.tr).

Language remains a major barrier to access to services, employment, and social cohesion, with only an estimated 15% of people under international and temporary protection speaking Turkish fluently. Adult refugee women are considerably less likely to speak Turkish or have gotten any formal education than men.⁷⁰⁶ Free Turkish courses are provided by Public Education Centres. 44,583 (14,184 male, 30,399 female) foreign nationals accessed to Turkish language courses in 2024.⁷⁰⁷ 14,983 migrants benefitted from Turkish language courses provided by Turkish Red Crescent Community Centres.⁷⁰⁸ Anadolu University and Yunus Emre Institute (through its "Distance Turkish Learning Portal") provides free, online Turkish language courses from beginner level (A1) to more advanced levels (C2/C1). In addition to them, some municipalities like İstanbul and NGOs provides language courses.⁷⁰⁹

Nor does the Turkish educational system offer adaptation or catch-up classes to foreign children whose previous education was based on a different curriculum. However, community centres operated by Türk Kızılay across the country also offer Turkish language classes and other services to applicants (see [Content of Temporary Protection](#)). A number of NGOs launched initiatives to improve online access to language courses. The 'Let's speak the same language' project is a free online Turkish language course offered to low-income young people with a strong desire to acquire Turkish.⁷¹⁰ In **İstanbul**, some Iraqis do not send their children to Turkish schools, but rather to Iraqi schools that are not monitored by the Ministry of National Education in the event that the family relocates to a third country. In İstanbul, only one school of this type exists.⁷¹¹

International protection applicants or status holders wishing to study at Turkish universities must take the university entrance exam (International Student Admission Exam), and meet specific criteria including holding a valid Foreigner Identification Number and completing the 12th grade. Detailed information on programs, admission requirements and fees can be found on respective university websites. Students may transfer credits from previous studies, subject to university approval. A new regulation was introduced in 2022 whereby foreign students have to pay a contribution fee for higher education, including Syrian students and blue cardholders.⁷¹² In 2023, like previous years, Turkish universities organised specific exams for foreign students and announced location of exam and the fees. Exam fees vary depending on the university and exam centre chosen, generally range from 350 TL to 2000 TL. Stakeholders noted that while there are plans to centralize these exams, no concrete steps have been taken to implement this so far.⁷¹³

Several scholarship opportunities are available, including the DAFI scholarship from UNHCR, which covers expenses such as accommodation, food, and tuition, and the Higher Education Cash Grant (HECG) for enrolled students with a minimum GPA of 1.5.⁷¹⁴ Accordingly, 756 students received DAFI scholarships in 2024.⁷¹⁵ Additionally, the ICMPD's EU Scholarships and YTB's Türkiye Scholarships offer financial support based on various criteria, including academic performance and location.⁷¹⁶ UNHCR's financial assistance for ex-minors is particularly based on the continuation to education including language courses, vocational or skill courses⁷¹⁷ which stopped as of May 2025. In 2023, PMM and Council of Higher Education signed a cooperation protocol to ease the bureaucracy of obtaining the student residence permits for foreign university students⁷¹⁸.

⁷⁰⁶ Inter-Agency Coordination Türkiye, IAPNA 6, January 2023, available [here](#).

⁷⁰⁷ Hayat Boyu Öğrenme Genel Müdürlüğü, İzleme ve Değerlendirme Raporu 2024, p.654, available [here](#).

⁷⁰⁸ TÜRK KIZILAY, SOSYOEKONOMİK GÜÇLENDİRME PROGRAMI, available [here](#).

⁷⁰⁹ Information provided by a stakeholder, May 2025.

⁷¹⁰ STGM, 'Aynı Dili Konuşalım Projesi Ücretsiz Online Türkçe Kursları Başlıyor', 31 August 2022, available in Turkish [here](#).

⁷¹¹ Information provided by a stakeholder, April 2023.

⁷¹² For example, Pamukkale University, 'Students of Syrian nationality and Blue Card holders, who have just started our university in the 2021-2022 Academic Year, will pay tuition fees', available in Turkish [here](#).

⁷¹³ Information provided by a stakeholder, May 2025.

⁷¹⁴ UNHCR, 'Admission to University', last accessed on 14 July 2024, available [here](#).

⁷¹⁵ UNHCR Türkiye, Higher Education Factsheet, January 2025, available [here](#).

⁷¹⁶ EU Scholarships, last accessed on 26 June 2025, available [here](#).

⁷¹⁷ Information provided by a stakeholder, June 2024.

⁷¹⁸ Başkanlığımız ile YÖK Arasında Uluslararası Öğrencilerin İkamet İzinlerine İlişkin İşbirliği Protokolü İmzalandı (15 November 2023), available [here](#).

The Turkish Employment Agency (İŞKUR) runs several vocational courses⁷¹⁹. Vocational courses are offered by public education centres with more than 31 thousand foreign nationals benefitted from these courses as of January 2025. According to the UNHCR, 15,000 individuals benefitted from vocational training courses. 38 Public Education Centres across 21 provinces supported by UNHCR. 90 workshops enhanced with support from UNHCR enhancing refugees' skills on pastry and culinary arts, textile, hairdressing, jewellery-making, toy carpentry, dry-cleaning, ceramics, and pearl craftsmanship.⁷²⁰ The Support for Transition to Labour Market Project (ISDEP 2) is a multi-agency initiative led by the Turkish Ministry of Labour and Social Security, in collaboration with the Directorate General of International Labour, the Turkish Employment Agency (İŞKUR), and Türk Kızılay (Turkish Red Crescent). The project is active until January 2025 and is being implemented in the provinces of Adana, Bursa, Gaziantep, Istanbul (both Anatolian and European sides), İzmir, Kocaeli, Konya, and Şanlıurfa. ISDEP 2 primarily targets foreigners under Temporary Protection and International Protection status (constituting 60% of beneficiaries), as well as Turkish citizens. Its goal is to facilitate access to the labour market and improve employment opportunities, particularly for Social Safety Net (SSN) beneficiaries.⁷²¹ Also, individuals can participate vocational courses of MESEM, the Center for Vocational Courses.⁷²²

The main barrier to access vocational education is lack of language proficiency. Finally, there are civil society organisations that provide free skills training, hobby, and vocational courses under the supervision of the Ministry of National Education.⁷²³

D. Health care

Indicators: Health Care

1. Is access to emergency healthcare for asylum seekers guaranteed in national legislation?
 Yes No
2. Do asylum seekers have adequate access to health care in practice?
 Yes Limited No
3. Is specialised treatment for victims of torture or traumatised asylum seekers available in practice?
 Yes Limited No
4. If material conditions are reduced or withdrawn, are asylum seekers still given access to health care?
 Yes Limited No

Türkiye's General Health Insurance (*Genel Sağlık Sigortası*, GHI) scheme makes it compulsory for all residents of Türkiye to have some form of medical insurance coverage, whether public or private. For persons whose income earnings are below a certain threshold and are therefore unable to make premium payments to cover their own medical insurance, the scheme extends free of charge health care coverage.⁷²⁴

A means assessment for the purpose of health care coverage decisions on applicants is foreseen in the law (see [Criteria and Restrictions to Access Reception Conditions](#)) and is carried out by PMM. The law also states that where PMM at a later stage identifies that an applicant is partially or fully able to pay their own health insurance premiums, he or she may be asked to pay back in part of in full the premium amount paid for by PMM to the general health insurance scheme.

Article 89(3) LFIP provides that "international protection applicants and status holders who are not covered by any medical insurance scheme and do not have the financial means to afford medical services" shall be considered to be covered under Türkiye's GHI scheme and as such have the right to access free of charge health care services provided by public health care service providers. For such persons, the health insurance premium payments shall be paid by PMM. Article 89(3) LFIP designates that PMM shall make

⁷¹⁹ İŞKUR, last accessed on 14 June 2024, available [here](#).

⁷²⁰ UNHCR Türkiye, Non Formal Education Factsheet, January 2025, available [here](#).

⁷²¹ Information provided by a stakeholder, May 2025.

⁷²² T.C. Milli Eğitim Bakanlığı, Mesleki ve Teknik Eğitim Genel Müdürlüğü, Mesleki Eğitim Merkezleri, available [here](#).

⁷²³ Education: Information portal for refugees in Turkey, last accessed on 14 June 2024, available [here](#).

⁷²⁴ Law No 5510 on Social Security and General Health Insurance lays down the scope and modalities of Türkiye's general health insurance scheme.

the premium payments on behalf of international protection applicants and status holders. Previously the Ministry of Family and Social Services made the payments in the framework of an arrangement between the two agencies. The assessment of means took the form of an “income test” which classified the beneficiary according to the level of income. Persons in the “G0” class have health care premiums covered entirely, while individuals in categories “G1”, “G2” and “G3” proportionally cover some of their health care costs.⁷²⁵ However, the assessment criteria changed in 2019 after changes to the LFIP.

According to the new law, the General Health Insurance Scheme is no longer applicable for international protection applicants one year after their registration, apart from those with special needs or ones approved by the Directorate General. After this one-year period, they can access these services only by paying General Health Insurance (GHI) premiums. Article 90(2) LFIP states that for applicants who fail to comply with the obligations listed in Article 90(1) or about whom a negative status decision was issued, the PMM may proceed to a **Reduction** of rights and benefits, with the exception of education rights for minors and basic health care. If their applications for international protection are denied, their access to public healthcare services is terminated. Irregular migrants without legal status are restricted from public healthcare services except for emergency care and have limited access to private healthcare services. Due to the fear of deportation, in practice they cannot access health care.⁷²⁶

Assessment criteria are, therefore, no longer applied to non-Syrians apart from vulnerable groups. For vulnerable cases the PMM requires evidence such as health and medical reports issued by state hospitals showing the vulnerable person’s health condition. In addition, the person should be diagnosed in Türkiye, otherwise they are not provided with health services according to the law.⁷²⁷

Usually, the patient and those who need treatment in the family of the person with international protection status have an identity card during the court application process. Nevertheless, once the case is rejected, the health service is terminated, and people are victimised by this application. Therefore, these people access health services in the private sector.⁷²⁸ In **Izmir**, when a person applies for international protection, they are expected to prove that they have a medical need in order to benefit from health services. In Istanbul, after one-year, international protection holders receive health care under the guise of “health tourism” and pay twice as much as Turkish beneficiaries.⁷²⁹

Lack of uniform application among PDMs continued to cause problems in various areas. For instance, some require a disability report proving that the applicant has 50% disability to consider them as vulnerable whilst others require 40% or 60%. Some PDMs accept disability reports, others do not.⁷³⁰ Accessing to such reports with an active ID is extremely difficult.

1. Scope of health care coverage

Under the Turkish health system, differentiation is made between primary, secondary and tertiary public health care institutions:

- Health stations, health centres, maternal and infant care and family planning centres and tuberculosis dispensaries that exist in each district in each province are classified as primary healthcare institutions;
- State hospitals are classified as secondary health care institutions;
- Research and training hospitals and university hospitals are classified as tertiary health care institutions.

Persons covered under the GHI scheme are entitled to spontaneously access initial diagnosis, treatment and rehabilitation services at primary health care institutions. These providers also undertake screening and immunisation for communicable diseases, specialised services for infants, children and teenagers as well as maternal and reproductive health services. The EU-funded SIHHAT project supported and

⁷²⁵ Türk Kızılay, *Syrian beneficiaries of Ankara community centre*, September 2018, available [here](#).

⁷²⁶ Information provided by stakeholders, March – April 2024.

⁷²⁷ Information provided by a stakeholder, June 2023.

⁷²⁸ Information provided by a stakeholder, April 2022 and May 2023.

⁷²⁹ Information provided by a stakeholder, April 2023.

⁷³⁰ Information provided by a stakeholder, May 2023.

developed primary health care services, under the project, in 2024, 181 Migrant Health Centres operates in 29 provinces to increase access to health services.⁷³¹

The SIHHAT project mainly focuses on reproductive health, mental health and psychosocial support, immunisation, mobile health services, cancer screening, and health literacy training. In 2022, the project's scope has been expanded to include vulnerable populations, such as seasonal migrant workers, and mobile health services. In addition to doctors with temporary protection status, doctors with origins in Yemen and Palestine have been recruited for the project.⁷³² 1,616,549 patients were reached by the project.⁷³³ In 2024, stakeholders observed that there are two types of Migrant Health Centers (MHCs): standard and reinforced. Reinforced MHCs are equipped with specialist staff and, in some cases, offer services in Farsi through interpreters. These centers may also provide access to psychologists, pediatricians, gynecologists, and dentists. A significant development in 2024 was a directive circulated to all health institutions, including MHCs, via a circular dated 21 May 2024. The directive instructed health personnel to report cases where individuals lack a valid ID or passport to the hospital police, who would then coordinate with Provincial Directorate of Migration Management (PDMM) officials to assess the individual's right to remain in Türkiye. Despite this development, stakeholders reported that vaccinations for babies have continued regardless of identification status.⁷³⁴

GHI beneficiaries are also entitled to spontaneously approach public hospitals and research and training hospitals in their province. Their access to medical attention and treatment in university hospitals, however, is on the basis of a referral from a state hospital. In some cases, state hospitals may also refer a beneficiary to a private hospital, where the appropriate treatment is not available in any of the public health care providers in the province. In such a case, the private hospital is compensated by the GHI and the beneficiary is not charged. In principle, referrals to university hospitals and private hospitals are only made for emergency and intensive care services as well as burn injuries and cancer treatment. That said, in situations of medical emergency, persons concerned might also spontaneously approach university hospitals and private hospitals without a referral.

GHI beneficiaries' access to secondary and tertiary healthcare services is conditional upon whether the health issue in question falls within the scope of the 2013 Health Implementation Directive (*Sağlık Uygulama Tebliği*, SUT).⁷³⁵ For treatment of health issues which do not fall within the scope of the SUT or for treatment expenses related to health issues covered by the SUT which exceed the maximum financial compensation amounts allowed by the SUT, beneficiaries might be required to make an additional payment. According to SUT, persons covered by the general health insurance scheme are expected to contribute 20% of the total amount of the prescribed medication costs and a small additional cost depending on the number of items.

People can also approach public health centres (*toplum sağlığı merkezi*) in their satellite city to benefit from primary health services free of charge.

If persons have a chronic disease such as diabetes, hypertension, or asthma that requires taking medicine regularly, in this case, they can approach a state hospital and ask them to issue a medication report. By submitting the medication report to the pharmacy, they can be exempted from the contribution fee.

According to Article 67(2) LFIP, applicants who are identified as "victims of torture, rape and other forms of psychological, physical or sexual violence" shall be provided appropriate treatment with a view to supporting them to heal after past experiences. However, as to the actual implementation of this commitment, guidance merely mentions that PMM authorities may cooperate with relevant public institutions, international organisations and NGOs for this purpose.⁷³⁶ That said, the free health care coverage of international protection applicants would also extend to any mental health treatment needs of applicants arising from

⁷³¹ SIHHAT project website, available [here](#).

⁷³² Delegation of The European Union to Türkiye, 'Homepage', last accessed 13 July 2023, available [here](#).

⁷³³ SIHHAT project website: available [here](#).

⁷³⁴ Information provided by a stakeholder May 2025.

⁷³⁵ Directive No 28597, 24 March 2013.

⁷³⁶ Article 113(1) RFIP.

past acts of persecution. In any case, free health care coverage under the general health insurance scheme also extends to mental health services provided by public health care institutions.

Where an international protection applicant has a medical issue, for which no treatment is available in their assigned province of residence, he or she may request to be assigned to another province to be able to undergo treatment (see [Freedom of Movement](#)). Article 110(5) RFIP allows applicants to request to be assigned to another province for health reasons.

A number of NGOs also offer a range of psychosocial services in different locations around Türkiye although capacity is limited. ASAM, Médecins du Monde Türkiye, HRDF, Support to Life and Türk Kızılay are some of the NGOs providing psychosocial support in different cities. Türk Kızılay Community Centres provides mental health support in 18 cities with its 19 centres (**Bursa, Adıyaman, Zonguldak, Malatya, İzmir, Adana, Ankara, Kayseri, Konya, Kocaeli, Kilis, Gaziantep, Kahramanmaraş, Mersin, Mardin, Şanlıurfa, Hatay** and two in **İstanbul**). The teams consist of psychiatrists, clinical psychologists, child development specialists, psychiatric nurses and translators and reached out to 742,098 people in total.⁷³⁷ In different locations, the IOM Psychosocial Mobile Teams (PMTs) delivered mental health and psychosocial support services to 4,249 people from migrant, refugee, and host groups by September 2024.⁷³⁸

According to the Cohesion Strategy and National Action Plan (2018-2023) the following were priorities for improvements in the area of health:

- Health assessments for immigrants upon arrival
- Vaccinations
- Access to primary care
- Increasing capacity for access to secondary and tertiary care
- Coordination
- Sensitizing health sector staff to needs of immigrants

The Action Plan includes:

- Ensuring better coordination of services;
- Health assessments upon arrival and vaccination programmes;
- Migrant health centres where there are high concentrations of people with temporary protection;
- Development of health services in return centres;
- Mobile health services for disadvantaged groups such as the elderly and disabled as well as for agricultural workers;
- Access to reproductive health;
- Migrant health centres able to provide oral/dental health services;
- Increasing access to community health centres;
- Central health appointment system in other languages than Turkish;
- Information tools in different languages;
- Bilingual patient orientation staff in hospitals where high concentration of migrants.

2. Practical constraints on access to health care

To benefit from GHI, applicants must already be registered with the PDMM and issued an International Protection Applicant Identification Card, which also lists the YKN assigned by the General Directorate of Population Affairs to each applicant. This YKN designation is a prerequisite for hospitals and other medical service providers to be able to intake and process an asylum seeker. The current obstacles to [Registration](#) thus have repercussions on asylum seekers' access to health care.

A person without an active ID, or someone residing outside their registered city, faces difficulties in accessing healthcare and medication. For newborn registrations, issues with the parents' IDs can prevent obtaining the child's birth report, leading to the child remaining without an identity for a long period. This results in the child having trouble accessing healthcare services and delays in vaccinations.

⁷³⁷ Toplum Merkezi, 'Toplum Merkezine Hoşgeldiniz', last accessed 13 July 2023, available in Turkish [here](#).

⁷³⁸ IOM, 'Göçmen ve Mülteci Destek Faaliyetleri, 11.11.2024, available [here](#).

Another significant challenge highlighted by many stakeholders is the one-year rule. After one year, applicants who cannot access free healthcare services, especially those with chronic illnesses, face difficulties. If a chronic illness was diagnosed before arriving in Türkiye, treatment expenses are not covered. However, if the illness was diagnosed in Türkiye, access to healthcare is granted after a health report is provided and the GHI becomes active.

In 2024, many stakeholders reported that one of the most significant challenges was the deactivation of GHI. Unlike in 2023, in İstanbul, the GHIs of children were deactivated despite their explicit classification as individuals with special needs. Additionally, the GHIs of conditional refugees were also deactivated, which marks a notable shift from previous practice. It can be still activated in cases involving chronic illnesses. In Van, Malatya, and İstanbul, stakeholders noted that GHI is activated only if the pregnancy is classified as high-risk, or in cases of cancer or severe disabilities. Stakeholders mentioned that in 2025, the situation worsened—even the GHI for people with severe disabilities (for example, hearing loss) is not activated.⁷³⁹

The implementation of GHI activation procedures also varied significantly across provinces. In Ağrı, while a basic medical report had previously been sufficient, in 2024 PDMM began requiring institutional reports. In Van, where access had previously been smoother, officials now require close follow-up and strong persuasion efforts. In Kayseri, the one-year rule is strictly applied, but the degree of disability is also taken into account in GHI activation decisions. In Kahramanmaraş, stakeholders described the process as particularly difficult and restrictive. Some stakeholders expressed concern that the widespread deactivation of GHI is being used as a tool to pressure individuals to give up and leave Türkiye.⁷⁴⁰

Despite children being categorized as individuals with special needs, for whom GHI should be activated, their GHIs remained deactivated throughout 2024. Stakeholders reported that attempts were made to address this issue by requesting protective measures under the Law on the Protection of Children. However, challenges arise particularly in cases involving children from families who have not been registered or whose applications for international protection have been rejected. In 2024, the General Directorate of Children's Services under the Ministry of Family and Social Services issued an internal circular stating that, for applications requesting protective or preventive measures for foreign national children, applicants must provide valid and up-to-date documentation from provincial migration directorates verifying their legal status in Türkiye, including approved identification. The circular explicitly emphasized that applications lacking proper identification would not be considered for protective measures. Stakeholders emphasized that these exceptions did not affect access to vaccinations, and even unregistered infants were able to receive mandatory vaccinations in 2024.⁷⁴¹

Obtaining the health report can be very challenging, especially if the person's ID is not active. For individuals without an active ID, this report is necessary to receive healthcare, but an active ID is required to apply for the report at the hospital. NGOs provide support to these individuals. Lawyers open administrative lawsuits in relation to access to health care for those who have chronic illness, often they receive positive decisions, but deactivation of GHI might be limited to a short period of time, such as one month. While obtaining a healthcare injunction decision for children is easier, it can take longer for adults. In some cases, a pregnant woman might give birth while waiting for the decision. If the mother is unregistered (undocumented), the birth can be processed as health tourism, resulting in a very high bill that the individuals cannot afford to pay. As the fees often cannot be paid by international protection holders this creates a huge debt in time.⁷⁴² In 2024, the number of babies born to foreign women were as follows: Uzbekistan 2,135 babies, Azerbaijan 1,797 babies, Turkmenistan 1,604 babies, Morocco 1,542 babies, Iraq 1,315 babies, Russia 1,167 babies, Afghanistan 1,086 babies.⁷⁴³

Médecins du Monde Türkiye implements a project to increase the protection and resilience of seasonal workers in Torbalı (Izmir), as well as undocumented migrants in the urban areas of Konak (Izmir), and

⁷³⁹ Information provided by multiple stakeholders April, May 2025.

⁷⁴⁰ Information provided by multiple stakeholders, April, May 2025.

⁷⁴¹ Information provided by multiple stakeholders, February and May 2025.

⁷⁴² Information provided by stakeholders, March – April 2024.

⁷⁴³ TÜİK, Doğum İstatistikleri, 2024, available [here](#) available [here](#).

Zeytinburnu, Esenyurt, and Fatih in Istanbul, providing health-oriented protection case management (referring, translating, and/or paying for beneficiaries with chronic or urgent medical issues)⁷⁴⁴.

HIV+ applicants face difficulties to access treatment, especially if they were diagnosed before arriving to Türkiye, sometimes NGOs provide supports for a couple months, but not being able to provide sustainable, longer solutions⁷⁴⁵. In **Istanbul**, access to health care is a continuous problem for individuals with special needs, and their health insurance is de-activated after only one year unless an NGO or bar association is involved.⁷⁴⁶ HIV+ patients face high costs without insurance, and **Central Anatolia** residents often do not disclose their status on their initial applications. In **Konya**, a HIV+ applicant have been denied health insurance, and a deportation order led to the deactivation of insurance.⁷⁴⁷

Previously, some NGOs provided substantial support to individuals without valid registration by collaborating with private hospitals. However, this is no longer feasible. Even if individuals can afford private hospitals, they are afraid to access healthcare because they are unregistered and fear being reported to the authorities⁷⁴⁸. The same issue exists for public hospitals. When unregistered refugees apply to a public institution, including a hospital, that institution is required to notify the appropriate law enforcement authorities. As a result, despite the fact that the majority of refugees have health problems, they avoid going to hospitals owing to fears of deportation, and their ability to receive healthcare services, which is a basic human right, is violated.⁷⁴⁹ There is knowledge of unregistered doctors conducting unauthorised medical examinations, this option is preferred by people who do not have active ID, or who face language barrier.⁷⁵⁰

The language barrier remains one of the main problems encountered by asylum seekers in need of access to health care services.⁷⁵¹ Hospitals in Türkiye give appointments to patients over the phone. Since hospital appointment call centres do not serve prospective patients in any language other than Turkish, foreign nationals need the assistance of a Turkish speaker already at appointment stage. According to stakeholders, almost all hospitals had interpreters as a result of the EU-funded SIHHAT project, including interpreters for Syrian beneficiaries of temporary protection (see [Temporary Protection: Health Care](#)), but there was a shortage of interpreters for uncommon languages.⁷⁵² NGOs in some locations also offer limited services to accompany particularly vulnerable asylum seekers to hospitals.

According to a recent study published by Heinrich Böll Stiftung⁷⁵³, public health centres and hospitals lack institutional translation services, forcing families to rely on children who speak better Turkish to act as interpreters, leading to potential miscommunication and ineffective treatments. While Migrant Health Centres offer services in Arabic, these are limited to districts with high migrant populations. Private hospitals provide translation services, but only families with sufficient financial resources can afford them. Additionally, family doctors may be reluctant to register migrants due to communication barriers, resulting in unvaccinated children. Although there are efforts to provide reproductive health information, written materials in Arabic are scarce. Refugees also face difficulties in accessing higher-tier healthcare facilities due to a preference for treating them at lower-tier public hospitals to minimize costs.

Other problems are lack of information, difficulties in paying fees, and capacity related issues in health care services. International protection status holders often do not know that vulnerable groups are exempted from the one-year limitation⁷⁵⁴. Exceptions are not largely enforced. As opposed to Turkish citizens, applicants for international protection have to pay a contribution fee for several treatments such as cancer

⁷⁴⁴ DDD, Provision of health protection and resilience of at-risk Syrians and undocumented migrants in Turkey | Dünya Doktorlarn, available [here](#).

⁷⁴⁵ Information provided by stakeholders, March – April 2024.

⁷⁴⁶ Information provided by a stakeholder, April 2023.

⁷⁴⁷ Information provided by a stakeholder, June 2023.

⁷⁴⁸ Information provided by stakeholder, March – April 2024.

⁷⁴⁹ Information provided by a stakeholder, May 2023 & Information provided by stakeholder, March – April 2024.

⁷⁵⁰ Information provided by a stakeholder, March 2024.

⁷⁵¹ Information provided by stakeholders, May-June 2023.

⁷⁵² Information provided by stakeholder, May 2023.

⁷⁵³ Heinrich Böll Stiftung, Göçmen Mahallelerinde Yaşam: Türkiye’de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı, November 2023, available [here](#).

⁷⁵⁴ Information provided by stakeholder, May 2023 & Information provided by stakeholder, March – April 2024.

treatment, eye treatment, child medical care and hepatitis.⁷⁵⁵ There is also an appointment problem for all citizens in Türkiye due to the capacity problem.⁷⁵⁶

The visa-free 90-day period and resident permit status did not cover medical expenses. Ukrainians requiring medical appointments had to apply for international protection; otherwise, they had to pay independently for such consultations. In **Ankara**, primary medical requirements and medications were covered by a private polyclinic contracted by the UNHCR. After initial examinations, Ukrainians with international protection status were referred to the state hospital. It is essential to note that among the new arrivals, there were Ukrainians with chronic or diseases that require long-term and periodic treatment (such as cancer and asthma). There were women who were pregnant or breastfeeding, so prenatal and postnatal care were essential. ASAM provided regular psychosocial support to individuals in need in Izmir and Ankara and UNHCR-contracted polyclinic offered psychiatrist consultations.⁷⁵⁷

Similar to the prior year, Afghan single women and women with children had difficulty gaining access to basic rights. Moreover, as a result of inadequate nutrition, diseases such as diabetes became widespread among Afghans.⁷⁵⁸ A thematic issue concerning Afghan nationals is the high number of Afghan children diagnosed with congenital heart defects, particularly holes in the heart. Stakeholders attributed this to malnutrition during early childhood in Afghanistan. As a result, some families require travel permits or transfers to larger provinces such as İstanbul, where specialized treatment is available.⁷⁵⁹

E. Special reception needs of vulnerable groups

Indicators: Special Reception Needs

1. Is there an assessment of special reception needs of vulnerable persons in practice?
 Yes No

The “persons with special needs” category includes “unaccompanied minors, handicapped persons, elderly, pregnant women, single parents with minor children, victims of torture, rape and other forms of psychological, physical or sexual violence”.⁷⁶⁰

In addition to the measures set out in **Identification**, the LFIP makes a number of special provisions regarding the reception services to be extended to “persons with special needs” including unaccompanied children. However, the additional reception measures prescribed by the law are far from sufficient.

1. Reception of unaccompanied children

When it comes to unaccompanied children, Article 66 LFIP orders that the principle of “best interests of the child” shall be observed in all decisions concerning unaccompanied minor applicants. According to the new Article 66(B) LFIP, all children younger than 18 shall be placed in children’s shelters or other premises under the authority of the Ministry of Family and Social Services.⁷⁶¹

Unaccompanied minors can benefit from shelter assistance provided by the Ministry of Family and Social Services until they turn 18⁷⁶². The rooms might be shared or private, the conditions vary. These shelters ensure that all basic needs, including food and clothing. A nurse is present at the facilities to monitor and attend to any health issues, and minors can be accompanied to hospitals or other health services if further medical attention is needed. Education is also supported, allowing minors to continue their formal or distance education according to their age and previous education level, with the guidance of a counselor. Additionally, these facilities provide a weekly or monthly allowance to help cover personal needs. They also

⁷⁵⁵ Information provided by a stakeholder, May 2023.

⁷⁵⁶ Information provided by stakeholders, March - April 2024.

⁷⁵⁷ ASAM report on Ukrainians.

⁷⁵⁸ Information provided by a stakeholder, May 2023.

⁷⁵⁹ Information provided by a stakeholder, May 2025.

⁷⁶⁰ Article 3(1)(I) LFIP.

⁷⁶¹ Law No 7196 amending several acts, 6 December 2019, in Turkish [here](#).

⁷⁶² Information Portal for Refugees in Turkey, Rights and Procedures for Unaccompanied Minors, available [here](#).

organise various activities such as language courses. Unaccompanied minors have the right to apply for asylum.

There are differences between provinces in the implementation of procedures regarding unaccompanied and separated children.⁷⁶³ Unaccompanied children, especially male children, may face difficulties in accessing protection. If the child does not have an identity card, the Child Support Centres (ÇODEM) will help to obtain one. If the child goes directly to a PDMM, he will not obtain an ID card as he must receive a guardianship decision from a court first. However, when children go to court for the appointment of a guardian, judges say that they cannot appoint a guardian because the child is not registered and, therefore, legally does not exist. This creates a vicious circle where children remain in a prolonged state of limbo and further hinders their access to the international protection procedure. When they leave the dormitory and reach the age of 18, they can apply for an ID.

There is no clarity in Child Protection Law and its regulation. The law concerning exit procedures for refugee children staying in dormitories remained unclear. Children's settlement is also problematic, and it is traumatizing because they are placed in dormitories by the juvenile police. Police officers often have lack of information on what to do and how to treat children. Practices change from district to district. Protection measures are taken when a child is placed in an orphanage, but a guardian is not appointed directly, which is problematic. Since the child does not have a legal representative, permission to leave cannot be obtained, even if all the other steps of family reunification are completed. PMM requires a legal representative for the child to leave the orphanage, but it is unclear who will handle the child's exit process as no guardian has been appointed. In some institutions, this problem is solved by assigning an internal officer for the signature.⁷⁶⁴ They are frequently detained in removal centres, where the administration of the removal centre appoints a detainee as the child's representative. Two siblings, for instance, were detained in a removal centre, and a detained family was appointed as their legal representative. They were required to be deported along with their designated representatives were deported.⁷⁶⁵ It is reported as a general problem that allocation of responsibility for unaccompanied minors is not clear, which causes conflicts between the provincial units of the Ministry of Family, Labour and Social Policies, children's police and PMM and results in protection gaps.⁷⁶⁶

Undocumented migrants are not permitted to travel within the country. They are unable to purchase a bus ticket, even if they have been sent to another city or are staying in a hotel. When they are apprehended, they are sent to removal centres and then pushed back towards the borders. Stakeholders continued to state that unaccompanied adolescents aged 15-16 had been determined to be 18 on paper⁷⁶⁷, while other unaccompanied children aged 12-13 were determined to be relatives of these older children and were released from child-care institutions.⁷⁶⁸

A study conducted with 449 unaccompanied minors in Türkiye reveals several challenges faced by these children during their migration journey⁷⁶⁹. Smugglers track their locations to ensure payment, causing children to avoid institutional care for fear of deportation, which makes them invisible to social services. The study highlights various issues: 15.7 percent of the children had registration-identity problems, 10 percent stayed on the streets upon arrival in Türkiye, 8 percent experienced violence during migration, and 8.8 percent reported being subjected to peer bullying.

Another research⁷⁷⁰ reveals that refugee child protection sector experiences inadequate coordination and cooperation among various actors, as well as short-term fundings, particularly during the reception phase. These challenges hinder the development of solutions for urgent protection issues like gender-based violence and child labor, as well as the establishment of a long-term, rights-based approach.

⁷⁶³ Ulusal Koruma Çalışma Grubu, Ortak 3RP Koruma Sektörü Çalıştayı, 2-3 Ağustos 2023

⁷⁶⁴ Information provided by various stakeholders, May-June 2023.

⁷⁶⁵ Information provided by a stakeholder, May 2023.

⁷⁶⁶ Information provided by various stakeholders, June 2023.

⁷⁶⁷ Information provided by stakeholders, March – April 2024.

⁷⁶⁸ Information provided by various stakeholders, May 2023.

⁷⁶⁹ Bianet, "Refakatsiz çocuklar sosyal hizmet radarının dışında kalıyor", 22.03.2024, available [here](#).

⁷⁷⁰ Mencütek, Karal, and Altıntop, 2023, Governance of Refugee Children Protection in Turkey: Between Vulnerability and Paternalism, Politics of Subsidiarity in Refugee Reception, eBook ISBN9781003369417.

A Ukrainian businessman welcomed unaccompanied children into his hotel in Antalya. A second one is located in Eryaman, Ankara. In the one in Eryaman, minors aging from 3 to 15 have resided while children older than 15 have placed in Antalya. The accommodations operated in close collaboration with the Ministry of Family and Social Services.⁷⁷¹ The Ministry of Family and Social Services provides protection and care services to a total of 45 Ukrainian children.⁷⁷²

2. Reception of survivors of torture or violence

According to Article 67(2) LFIP, applicants who are identified as “victims of torture, rape and other forms of psychological, physical or sexual violence” shall be provided appropriate treatment with a view to helping them heal from past experiences. However, as to the actual implementation of this commitment, guidance merely mentions that PMM authorities may cooperate with relevant public institutions, international organisations and NGOs for this purpose (see [Health Care](#)). It is also important to note that registration is a pre-requirement to access shelters.

Survivors of gender-based violence are referred to Centres for the Elimination and Monitoring of Violence (*Şiddet Önleme ve İzleme Merkezi, ŞÖNİM*) which are run by the Ministry of Family and Social Services. There are other shelters managed by municipalities or NGOs.⁷⁷³ In 2024, in total there are 150 women's shelters with a capacity of 3,683⁷⁷⁴; 112 shelters affiliated with the Ministry in 81 provinces provided services with a capacity of 2,814; 35 women's shelters affiliated with municipalities in 13 provinces with a capacity of 807; 1 women's shelter affiliated with NGOs with a capacity of 20; and 2 women's shelters affiliated with PMM with a capacity of 42. The number of existing women's shelters, managed by the municipalities and their capacities are not sufficient⁷⁷⁵. In 2024, to maintain women's shelter services in Hatay, which was affected by the earthquake, 3 containers were provided, furnishing support was given to shelters in need. There are now two dedicated facilities for survivors of human trafficking: one operated by PMM for women in **Kırıkkale** with 12 places, and another shelter for women operated by the municipality of **Ankara** with 30 places.⁷⁷⁶ LGBTIQ+ victims can also access to these facilities.⁷⁷⁷ In 2024, the Turkish government allocated 896,640 TRY (\$27,710) to international organizations for trafficking-related projects, significantly less than the 1.9 million lira (\$58,720) provided in 2022, and did not fund domestic NGOs. PMM funded anti-trafficking shelters in Ankara and Kırıkkale with over 1.7 million lira combined for operations and renovations. Despite available support services for victims, including shelter, medical care, and financial assistance, shelters lacked capacity, denied access to transgender victims, and faced shortages in supplies. Observers highlighted persistent issues such as limited translation services, lack of digital case management, and minimal NGO involvement. The government supported 299 victims in 2024 and provided job placement for six, while coordination among victim service providers continued through PMM's working group.⁷⁷⁸

Public institutions and municipalities providing support to women survivors of violence reject requests from unregistered migrant women, registration and residential address as essential criteria hinders their access to such shelters and services. Migrant women who are not in their registered province are often denied help and told to apply to access services in their registered province, even if they are at risk of violence⁷⁷⁹. Other challenges can be summarised as inadequate resources, limited capacity of the shelters, lack of expertise, and language barriers (due to lack of support from interpreters).

In most cases, the criteria for renewal of residence permits and financial support, long waiting times, and lack of interpreters can leave women and children survivors of gender-based violence unregistered. Refugee women and girls have a right to documentation, including identity papers and travel documents issued in their own names, but this is often not the case in practice since the PMM requires women to produce a certificate proving their status as married/divorced or widowed. Another approach that does not

⁷⁷¹ Information provided by a stakeholder, March 2023.

⁷⁷² T.C. Aile ve Sosyal Hizmetler Bakanlığı, Faaliyet Raporu 2024, available [here](#).

⁷⁷³ Ministry of Family, Labour and Social Services, *Şiddet Önleme ve İzleme Merkezi*, available in Turkish [here](#).

⁷⁷⁴ T.C. Aile ve Sosyal Hizmetler Bakanlığı, 2024 Faaliyet Raporu, available [here](#).

⁷⁷⁵ Information provided by stakeholders, March – April 2024.

⁷⁷⁶ PMM, *Victims of human trafficking*, available [here](#).

⁷⁷⁷ Information provided by a stakeholder, June 2023.

⁷⁷⁸ U.S. Department of State, 2024 Trafficking in Persons Report: Turkey (Türkiye), available [here](#).

⁷⁷⁹ GAR, Çoklu Kıskaç Altında: Göçmen ve Mülteci Kadınların Sorunları Üzerine Güncel Bir Değerlendirme, GAR-RAPOR NO:10, available [here](#).

adopt gender sensitivity is that divorced or widowed women must prove that they are divorced or widowed to receive the Türk Kızılay Card.

In 2024, stakeholders reported that many incidents of violence remained unreported due to the fear of being apprehended and transferred to a Removal Center. If the survivor does not hold a valid ID, stakeholders noted that there is an almost certain risk of detention. Even in cases where the survivor holds an ID, the possibility of being taken into administrative detention remains, particularly if the person is seen as “involved” in a criminal case. In some instances, police officers reportedly warned survivors about these risks before filing a report, despite not being the competent authority to initiate a transfer to a Removal Center.⁷⁸⁰

Due to language barriers, access to justice can be particularly challenging for women. They receive legal notifications in Turkish, not in their native languages. Additionally, women may fear of accessing the justice system and the loss of their status and rights⁷⁸¹. The cancellation of social support and social cohesion programmes increased refugee women's social isolation and exposed them to domestic violence. Even greater obstacles exist for women refugees from vulnerable groups, such as sex workers, to access health services, for instance, they often lack access to sexual health information, health care facilities, HIV testing centres, and counselling services.⁷⁸² Asylum-seeking women, especially single women, may be exposed to discrimination on the grounds of gender, especially in finding a rental house, taking part in social life, and accessing labour market⁷⁸³. Fear of deportation leads to underreporting of GBV cases, law enforcement's negative attitudes further complicate complaint processes and the tendency to hide child marriages in refugee communities also pose significant barriers to addressing GBV.⁷⁸⁴

During the post-earthquake period, increased instances of child and forced marriages, difficulties in accessing sanitation and hygiene facilities, and the need for measures against sexual exploitation and abuse were identified⁷⁸⁵. Those affected by earthquakes face increased gender-based violence risks, marriage sometimes seen as a security measure, including for children.

Under the collaboration between the Istanbul Metropolitan Municipality (İBB) and the Istanbul Bar Association, lawyers will be available on specific days of the week at the Municipality's Women's Centres to provide legal counselling services to combat violence against women. The İBB, which has been offering a 24/7 Women's Support Line⁷⁸⁶ in multiple languages – Turkish, Kurdish, Arabic and English- will now provide free legal counselling at three of its Women's Centres—Esenyurt, Gaziosmanpaşa, and Ümraniye—and refer women needing legal representation to the Bar Association's Legal Aid Office.

3. Reception of LGBTQI+ persons

LGBTQI+ persons are not mentioned as a category of “persons with special needs” in the LFIP.

In 2024, the trend of referring LGBTQI+ international protection applicants to specific cities where communities were known to be more open and sensitive to this population, such as **Eskişehir**, **Denizli** and **Yalova**, changed, as these provinces are closed for registration. In addition, stakeholders indicated that LGBTQI+ individuals, including transgender persons, could be referred to Çorum, Elazığ, Erzurum, Yozgat, Kayseri, Niğde, and Hakkari in 2023. In 2024, however, referrals increasingly included provinces like Afyonkarahisar and Uşak, where the refugee population is smaller, and where the local population is more conservative comparing the cities they were referred to in the past. Vulnerability was not taken into consideration during the referral process.⁷⁸⁷ LGBTQI+ individuals face threats and risks due to a lack of

⁷⁸⁰ Information provided by multiple stakeholders April and May 2025.

⁷⁸¹ Information provided by stakeholders, March – April 2024.

⁷⁸² Information provided by various stakeholders, May-June 2023.

⁷⁸³ Information provided by stakeholders, March – April 2024.

⁷⁸⁴ Ulusal Koruma Çalışma Grubu, Ortak 3RP Koruma Sektörü Çalıştayı, 2-3 Ağustos 2023 & Information provided by stakeholders, March – April 2024.

⁷⁸⁵ Ulusal Koruma Çalışma Grubu, Ortak 3RP Koruma Sektörü Çalıştayı, 2-3 Ağustos 2023 & Information provided by stakeholders, March – April 2024.

⁷⁸⁶ Kadın Destek Hattı, available [here](#).

⁷⁸⁷ Information provided by a stakeholder, June 2023 & Information provided by stakeholders, March – April 2024, and information provided by multiple stakeholders April – May 2025.

supportive NGOs in smaller provinces⁷⁸⁸. They face challenges when they request to change cities, the risk of attack is not considered as valid reasons to be relocated. There were some cases when they were referred to other provinces after physical attacks.⁷⁸⁹ LGBTQI+ refugees are among the groups prioritised to be resettled in a third country.

In 2024, discrimination against refugee LGBTQI+ individuals have increased significantly, creating serious obstacles to accessing housing, healthcare, and employment.⁷⁹⁰ Access to safe and dignified housing is particularly limited for transgender persons⁷⁹¹. There are no shelters dedicated to LGBTQI+ individuals. In many provinces, LGBTQI+ applicants face additional challenges to reception, particularly due to the lack of state-provided accommodation and the requirement to secure their own accommodation. For persons who do not fit in the predominant gender roles, housing may become more difficult to find but also precarious, as many fear the risk of being evicted by landlords if their orientation or identity is discovered.⁷⁹² In 2022, NGOs, such as Positive Living Association could sometimes provide support in finding temporary housing - for a maximum of 7 days -, but only for extremely vulnerable cases such as LGBTQI+ people subject to gender-based violence.⁷⁹³

NGOs continue providing short term solutions. According to stakeholders, temporary housing support was significantly reduced in 2024 due to funding cuts⁷⁹⁴. Many of the challenges in accessing health services which were highlighted in the report published in 2021⁷⁹⁵ remain in 2024, such as language barriers, lack of translators, bureaucracy, complex healthcare system and hospital layouts, LGBTQI+ phobia, discrimination, and racism, insufficient education about LGBTQI+ issues, and HIV phobia and stigmatisation experienced by refugees living with HIV. In 2024, a Syrian transgender woman was exposed on the social media platform X (formerly Twitter) for receiving medication support as an HIV-positive individual. Shortly after the post, she was apprehended, taken to a Removal Center, and within half an hour, was forced to sign a voluntary repatriation form. She was deported the same day. It was later confirmed that she was killed in Syria. Stakeholders viewed this case as a stark illustration of the authorities' sensitivity to potential public backlash, particularly in cases involving gender identity and access to healthcare. They emphasized that the swift deportation appeared to be driven by the government's desire to suppress public reaction, especially as the provision of HIV medication to a Syrian transgender woman was framed by some segments of society as illegitimate or unlawful.⁷⁹⁶

Refugees living in Türkiye have the right to gender/sex-reassignment surgery, just like every citizen living in the Republic of Türkiye but must be legally resident under Temporary Protection or International Protection. In the absence of these, the person can start the process with a passport, and if there is no proof of legal stay in Türkiye, the person can start the process with a passport and an official document proving that they are staying in Türkiye legally. In addition to this, the person must be 18 years old and unmarried, either single or divorced.

Refugees face several barriers to accessing this type of service. Firstly, there is a language barrier when a lawsuit needs to be filed. Without an interpreter, the process takes longer and becomes more difficult. Secondly, as the process progresses, individuals are transferred to training and research hospitals in big cities. This requires frequent travel, leading to significant travel and accommodation expenses,⁷⁹⁷ which they must cover themselves. During the psychiatric observation period that lasts for six months to two years, there are language barriers and translator difficulties. When hormone therapy begins, the medication costs are not covered. Additionally, surgeries are very expensive.⁷⁹⁸ In public hospitals, the GHI covers the cost of certain surgeries, such as vaginoplasty and testicle removal, but applicants must pay for the remaining

⁷⁸⁸ Information provided by stakeholders, March – April 2024.

⁷⁸⁹ Information provided by a stakeholder, March 2024.

⁷⁹⁰ KAOS GL, "Mülteci LGBTI+'ların talep ve eleştirileri Eskişehir'de konuşuldu", 10/10/2023, available [here](#).

⁷⁹¹ Ulusal Koruma Çalışma Grubu, Ortak 3RP Koruma Sektörü Çalıştayı, 2-3 Ağustos 2023.

⁷⁹² Information provided by a stakeholder, June 2023.

⁷⁹³ Information provided by a stakeholder, June 2023.

⁷⁹⁴ Information provided by multiple stakeholders, May 2025.

⁷⁹⁵ AIDA Turkey, 2021, available [here](#).

⁷⁹⁶ KAOS GL, HIV statüsü ifşa edilen Suriyeli trans kadına "gönüllü geri dönüş formu" bir saatte imzalatıldı, itiraz süresi beklenmeden gönderildi, 12.08.2024, available [here](#).

⁷⁹⁷ Information provided by a stakeholder, March 2024.

⁷⁹⁸ Information provided by a stakeholder, March 2024.

cost.⁷⁹⁹ As of May 2025, the United Nations High Commissioner for Refugees' monthly financial assistance of 2,300 TRY for transgender and intersex refugees will no longer be provided.⁸⁰⁰

In addition, transgender persons who start or are undergoing gender reassignment process may face obstacles in securing treatment due to hospitals' limited familiarity with this field, as well as restricted financial capacity to afford hormones which are not covered by social security. The gender reassignment process can only be carried out in certain cities in Türkiye where there are hospitals having specialised services for this process. Under the management of Positive Living Association and with the financial support of UNFPA, a new project enabling the purchase of prescribed hormones from pharmacies for up to three months. In addition, the project provides a one-time payment for a doctor's appointment for GHI recipients whose GHI got deactivated due to the one-year rule, if the applicant encounters difficulties in accessing an appointment due to language barriers or gender-based discrimination.⁸⁰¹ Red Umbrella Sexual Health and Human Rights Association provides legal information to those who wish to file a lawsuit or seek information about the process, this includes details about the legal procedure and how to obtain legal support.

In state hospitals, they can find SIHHAT-funded interpreters, but LGBTQI+ refugees have reported that they find it difficult to express themselves freely in sessions due to the fact that they access psychological support through interpreters, and specialists are sometimes not sufficiently aware on matters of gender, sexual orientation, gender identity, and the related prejudices.⁸⁰² They prefer to contact Positive Living Association's service units in Istanbul (Anatolian / European sides), Eskisehir, Mersin, Denizli, and Yalova or Red Umbrella Sexual Health and Human Rights Association's service unit in Ankara.⁸⁰³ As of mid-2025, this trend persists, albeit with a reduced number of NGOs as a result of funding cuts.⁸⁰⁴

If refugees are unable to undergo this process in the provinces they registered in due to the lack of facilities, it is not accepted as a reason for relocation. Undergoing the gender transition process is not considered a valid reason for changing their residence permits.⁸⁰⁵ For instance, transgender residents of **Denizli** are required to obtain a travel permit to attend the hospital regularly in Izmir.⁸⁰⁶ Medical records from hospitals need to be used to obtain travel permit via E-Devlet (an online platform to access public services).⁸⁰⁷ In practice, travel permits are granted for this purpose without any major problems. However, they might encounter some problems with accessing information due to the lack of social network, referrals from the hospital, covering their travel and accommodation expenses.⁸⁰⁸ For transgender people in the transition process who reside in small cities, obtaining travel permits to receive treatment at hospitals specialising in this field, which are primarily located in Izmir, Ankara, Istanbul, Adana, and Mersin, remains quite difficult, especially due to the cost.

In 2024, courts reportedly issued rulings in favor of transgender persons' transition processes access to hormone therapy, and name changing procedures. However, applications are made to the courts to correct the gender information in their IDs, the courts usually give negative decisions on the grounds that the person is not a Turkish citizen.⁸⁰⁹ Stakeholders emphasized that citizenship is not a legal requirement for such corrections and attributed these rejections to a lack of awareness among judges.⁸¹⁰

4. Reception of persons living with HIV

People living with HIV are not explicitly identified as a group having special needs in the LFIP. However, PMM has classified individuals living with HIV as chronic disease holders, and as a consequence,

⁷⁹⁹ Information provided by a stakeholder, June 2023.

⁸⁰⁰ Information provided by a stakeholder, June 2025.

⁸⁰¹ Information provided by a stakeholder, June 2023.

⁸⁰² Information provided by a stakeholder, June 2023.

⁸⁰³ Information provided by a stakeholder, June 2023.

⁸⁰⁴ Information provided by multiple stakeholders May and June 2025

⁸⁰⁵ Information provided by a stakeholder, March 2024.

⁸⁰⁶ Information provided by a stakeholder, June 2023.

⁸⁰⁷ Information provided by a stakeholder, June 2023.

⁸⁰⁸ Information provided by a stakeholder, March – April 2024.

⁸⁰⁹ Information provided by a stakeholder, March 2024.

⁸¹⁰ Information provided by a stakeholder, May 2025.

international protection holders can continue receiving the necessary medical services one year after registering. Few NGOs deal with the needs of this group such as Positive Living Association in **Istanbul** (Anatolian / European sides), **Yalova, Denizli, Mersin, Eskisehir** and Red Umbrella Sexual Health and Human Rights Association in **Ankara**. In 2023, in general courts ruled that the applicant's GHI registration must be reactivated due to the applicant's special needs. In 2024, this trend persisted among international protection applicants and temporary protection status holders under the jurisdiction of administrative courts, as well as among residence permit holders under the jurisdiction of labour courts.⁸¹¹ Since 2021, Positive Living Association and Red Umbrella Sexual Health and Human Rights Association have provided prescription assistance to HIV+ individuals for up to three months, or six months in exceptional circumstances. The reason behind the need for assistance is the significant delay in reactivating the health coverage of international protection applicants after a year. Since there should be no interruption in this form of treatment, these two organisations, with UNFPA funding, started providing assistance to the applicants. In addition, the stigma against refugees living with HIV is quite persistent and they are blamed for the rising number of HIV cases in Türkiye. Lack of access to contraceptives is a further obstacle to their sexual safety. To combat this issue, the Positive Living Association and Red Umbrella Sexual Health and Human Rights Association have been distributing condoms and conducting trainings on sexual health and safety. Furthermore, they refer some applicants to testing centres because they believe the number of refugees living with HIV to be higher than the actual figure.⁸¹² As of 2025, this support does not continue because of PRM funding cut.⁸¹³ Positive Living Association started a new project in 2023 aiming to empower people living with HIV and support their capacity building through counseling and up-to-date HIV information. The project continued in 2024 and implemented solely by UNFPA Türkiye, without any partner organizations since June 2024.⁸¹⁴

NGOs also helped Ukrainians living with HIV present in Türkiye. They primarily provided services in Istanbul and Antalya, but as of late 2022, they started to leave Türkiye. The majority of this profile legally resides in Türkiye on a temporary or permanent residency basis.⁸¹⁵ ASAM provided translation assistance to vulnerable Ukrainians, such as persons living with HIV, LGBTIQ+ and the elderly.

F. Information for asylum seekers and access to reception centres

1. Provision of information on reception

Following the changes in the [Registration](#) system in 2018, when a PDMM is unable to register their application, applicants for international protection are generally informed of the province (“province of residence”) where they have to report to the PDMM in order to register their application and where they will be required to reside. However, this is not consistently done across provinces.

The [Help](#) platform established by UNHCR provides information on rights such as education, employment and health care in English, Turkish, Arabic and Farsi. This platform has a new section for Ukrainian nationals, providing specific information for this group. In addition, UNHCR’s services advisor platform⁸¹⁶ which shows available services for refugees in Türkiye and UNHCR Türkiye Information Board on Facebook are accessible for asylum seekers. (See [Provision of information on the procedure & Information for asylum seekers and access to NGOs and UNHCR](#)).

2. Access to reception centres by third parties

Indicators: Access to Reception Centres

1. Do family members, legal advisers, UNHCR and/or NGOs have access to reception centres?
 Yes With limitations No

⁸¹¹ Information provided by a stakeholder, June 2025.

⁸¹² Information provided by a stakeholder, June 2023.

⁸¹³ Information provided by a stakeholder May 2025.

⁸¹⁴ Information provided by a stakeholder, May 2025.

⁸¹⁵ Information provided by a stakeholder, June 2023.

⁸¹⁶ Available [here](#).

As stated in [Types of Accommodation](#), the only Reception and Accommodation Centre currently in operation to shelter international protection applicants is in the province of **Yozgat** with a modest capacity of 100 places. Since Reception and Accommodation Centres are defined as open centres, neither Article 95 LFIP nor the Removal Centres Regulation make any specific provisions concerning residents' access to family members, legal advisors and UNHCR. In relation to NGOs' access to Reception and Accommodation Centres specifically, according to Article 95(8), NGOs' "visits" to these facilities will be subject to the permission of PMM (see [Information for asylum seekers and access to NGOs and UNHCR](#)).

Finally, Article 92(3) LFIP guarantees UNHCR's access to all international protection applicants. This access provision must be interpreted to extend to applicants accommodated in Reception and Accommodation Centres.

G. Differential treatment of specific nationalities in reception

Given the dual system operated by Türkiye, which distinguishes international protection from temporary protection, different reception arrangements are laid down for applicants for international protection and persons under temporary protection. While a small fraction of the population of temporary protection beneficiaries from **Syria** subject continue to be sheltered in Temporary Accommodation Centres, the vast majority have to secure their own accommodation, similar to applicants for international protection. That said, Syrians' access to essential rights is generally described as more straightforward than that of non-Syrian applicants for international protection.

For more detail, please see [Differential treatment of specific nationalities in the procedure](#).

Detention of Asylum Seekers

A. General

Indicators: General Information on Detention

1. Total number of asylum seekers detained in 2024: ⁸¹⁷	Not available
2. Number of asylum seekers in detention at the end of 2024:	Not available
3. Number of Removal Centres:	32
4. Total capacity of Removal Centres:	17,780

Statistics on pre-removal detention of asylum seekers and other migrants are not available. There are no statistics available on the number of persons applying from detention across the country either.

While most international protection applicants are not systematically detained, categories of international protection applicants most commonly detained include:

- Persons who make an international protection application in border premises;
- Persons who apply for international protection after being intercepted for irregular presence and being placed in a Removal Centre, including persons readmitted to Türkiye from another country;
- Persons who have made an application for international protection and are apprehended without documentation or outside their assigned province (“satellite city”) without authorisation;
- Persons who wish to apply for international protection but were unable to submit their application before a PDMM office ([Access to Registration](#))
- Persons issued a security restriction code, for example on suspicion of being foreign terrorist fighters (*Yabancı Terörist Savaşçı*, YTS).

While Removal Centres (*Geri Gönderme Merkezi*, RC) are essentially defined as facilities dedicated for administrative detention for the purpose of removal, in practice they are also used to detain international protection applicants (see Place of Detention). There are 32 active Removal Centres.⁸¹⁸ In the first quarter of 2024, two temporary Removal Centers became operational in Istanbul’s Arnavutköy district: Arnavutköy Temporary Removal Center-1 on 2 January 2024, and Arnavutköy Temporary Removal Center-2 on 27 March 2024. As a result, the total national capacity increased to 18,630. In the second quarter, a new Removal Center was opened in Çatalca, while the one in Silivri was closed. Additionally, the capacities of the Aydın and Balıkesir Removal Centers were reduced. Consequently, the total national capacity stood at 18,780 in the second quarter of 2024. It is planned that another Removal Center will be opened in Istanbul in the upcoming period, with the total capacity expected to reach 19,000 by the end of 2024.⁸¹⁹

There is no official data on the number of asylum seekers detained in removal centres. However, many of these centres operate over capacity, and the turnover of people is very high.⁸²⁰

The LFIP provides that international protection applications of detained applicants other than requiring that applications of detained applicants shall be finalised “as quickly as possible”,⁸²¹ and that they fall within the scope of the [Accelerated Procedure](#).⁸²² (See also: Applications from detention and at the border)

⁸¹⁷ Including *both* applicants detained in the course of the asylum procedure and persons lodging an application from detention.

⁸¹⁸ PMM, Faaliyet Raporu, 2024, available [here](#).

⁸¹⁹ Ibid.

⁸²⁰ Information provided by stakeholders, March – April 2024.

⁸²¹ Article 68(5) LFIP.

⁸²² Article 79(1)(ç) LFIP.

B. Legal framework of detention

1. Grounds for detention

Indicators: Grounds for Detention

- | | | |
|--|---|-----------------------------|
| 1. In practice, are most asylum seekers detained | | |
| ❖ on the territory: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ❖ at the border: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Are asylum seekers detained during a regular procedure in practice? | | Varies |

The LFIP provides for two types of administrative detention:

- ❖ Administrative detention of international protection applicants during the processing of their applications;⁸²³ and
- ❖ Administrative detention for the purpose of removal.⁸²⁴

1.1. Detention of international protection applicants

The decision to detain an applicant for international protection is issued by the governorate of the “satellite city” in which the applicant resides. That said, administrative detention of international protection applicants must be an exceptional measure.⁸²⁵ Persons “may not be detained for the sole reason of having submitted an international protection application.”⁸²⁶

Article 68(2) LFIP identifies four grounds that may justify detention of international protection applicants:

- In case there is serious doubt as to the truthfulness of identity and nationality information submitted by the applicant for the purpose of verification of identity and nationality;
- At border gates, for the purpose of preventing irregular entry;
- Where it would not be possible to identify the main elements of the applicant’s international protection claim unless administrative detention is applied;
- Where the applicant poses a serious danger to public order or public security.

In practice, there is no substantial information on detention being ordered under Article 68 LFIP for the purpose of the international protection procedure. Most detained asylum seekers are deprived of their liberty on the basis of pre-removal detention.

1.2. Pre-removal detention

According to Article 57(2) LFIP, detention for the purpose of removal may be ordered to persons issued a removal decision who:

- Present a risk of absconding;
- Have breached the rules of entry into and exit from Türkiye;
- Have used false or forged documents;
- Have not left Türkiye after the period of voluntary departure, without a reasonable excuse;
- Pose a threat to public order, public security or public health.

The law further provides that detention shall immediately cease where it is no longer necessary.⁸²⁷

The RFIP provides that where a person makes an application for international application while detained in a Removal Centre, he or she will remain in detention without being subject to a separate detention order for the purposes of the international protection procedure.⁸²⁸ This not only runs contrary to the LFIP, which

⁸²³ Article 68 LFIP.

⁸²⁴ Article 57 LFIP.

⁸²⁵ Article 68(2) LFIP; Article 96(1) RFIP.

⁸²⁶ Article 68(1) LFIP.

⁸²⁷ Article 57(4) LFIP.

⁸²⁸ Article 96(7) RFIP.

provides that applicants for international protection are protected from deportation, but also raises the risk that grounds for detention under Article 68 LFIP will not be adequately assessed with a view to maintaining or releasing an applicant from pre-removal detention. Pre-removal detention orders continue to be issued towards asylum seekers; however, some people are released after their application for international protection has been registered. Due to the severe barriers to the registration of applications from Removal Centres, even this may involve a lengthy period of pre-removal detention. In 2022, 2023 and 2024 stakeholders reported that reporting duties and being placed at a residential address were used more frequently, especially if the detainee does not have any security code-related restrictions.⁸²⁹ (See the section on [Detention Alternatives](#).)

1.3. Detention without legal basis

Beyond detention in the international protection procedure and pre-removal detention, a number of migrants and asylum seekers are arbitrarily detained without legal basis. Firstly, persons who are apprehended outside their designated/ registered province may be detained in order to be transferred back. According to stakeholders, the combination of the registration ban in certain provinces and the travel ban continued to force Syrians and non-Syrians either to stay illegally in one province or to travel illegally to other provinces, thus risking detention and deportation in 2024.⁸³⁰ While it appears that detention is imposed on applicants who violate residence restrictions with varying rigour, often depending on different factors such as the nationality of the individual.⁸³¹ The authorities have intensified checks by mobile migration points and check points between cities, which increase identification of the persons travelling outside their designated province, resulting in an increasing number of applicants for international protection detained in Removal Centres⁸³² In 2024, individuals were subjected to arbitrary detention primarily due to having a criminal record. This included people who had already been acquitted, individuals who were victims in criminal proceedings, and even those who visited a police station to file a complaint — all of whom were detained on the grounds of “public order” violations. According to stakeholders, despite the regime change in Syria in December 2024, as of June 2025 there has been little to no change in the practice of arbitrary detention targeting Syrians in Türkiye.⁸³³ (see [Freedom of Movement](#)).

In 2019, the LFIP was amended as concerned the rules on ‘inadmissible passengers’ (*kabul edilemez*), to say that ‘foreigners covered under this article shall stay at the designated areas at border gates until the process in relation to them is finalised.’ NGOs shared their concerns that this practice had created problems and violations of procedural safeguards, and about the period of detention, conditions and access to appeal.⁸³⁴ (See [Access to the territory](#)).

In practice, it is widely reported that applicants for international protection are held in facilities at the airport. It was reported that people arriving irregularly ‘inadmissible passengers’ were held for long in the new airport in İstanbul in 2024, similarly to the previous year.⁸³⁵ (See [Access to the territory](#)). Even though this is not formally regarded as a form of detention, as stated in the judgment of the Constitutional Court in *B.T.*, any detention beyond 48 hours prior to transfer to a Removal Centre is unlawful and constitutes a violation of the right to liberty.⁸³⁶

After being apprehended by law enforcement, irregular migrants' fingerprints and pictures are stored in a database shared by the General Directorate of Security, the Gendarmerie General Command, the Coast

⁸²⁹ Information provided by a stakeholder, May 2023 & Information provided by stakeholders, March – April 2024. Information provided by multiple stakeholders April and May 2025.

⁸³⁰ Information provided by stakeholders, March – April 2024.

⁸³¹ Information provided by various stakeholders, May-June 2023.

⁸³² Information provided by stakeholders, March – April 2024.

⁸³³ Information provided by multiple stakeholders April and May 2025.

⁸³⁴ Mülteci-Der, Joint Assessment: Proposed Amendments in the Law on Foreigners and International Protection of Türkiye, 4 December 2019, available [here](#)

⁸³⁵ Information provided by a stakeholder, May 2023 and March 2024 and February 2025.

⁸³⁶ Constitutional Court, *B.T.*, Decision 2014/15769, 30 November 2017, available [here](#). The applicant was an Uzbek national who tried to exit Türkiye and enter Greece with a counterfeit passport. B.T. was detained in **Sabiha Gökçen Airport** in İstanbul for 6 days before being transferred to **Kumkapı** Removal Centre. There, he applied for international protection and after 44 days he was released and assigned to **Sinop**. See also Anadolu Agency, ‘AYM'den Özbekistan vatandaşı için hak ihlali kararı’, 16 February 2018, available in Turkish [here](#).

Guard Command, and the Directorate of Migration Management. Foreign nationals transported to a removal centre are interviewed to determine their identification, nationality, and travel documents. Deportation processes are carried out if considered appropriate when the required legal process is finished. However, in some circumstances, detainees cannot be deported since Türkiye lacks removal arrangements with the relevant countries.⁸³⁷

It is reported that in certain provinces such as Hatay, Article 8(3) of Temporary Protection Regulation is used as a legal basis that creates a de facto detention regime without procedural safeguards. The provision mentions the possibility of keeping foreigners who are to be excluded from temporary protection in certain designated locations without taking them under administrative detention.⁸³⁸

2. Alternatives to detention

Indicators: Alternatives to Detention

1. Which alternatives to detention have been laid down in the law?
 Reporting duties
 Surrendering documents
 Financial guarantee
 Residence restrictions
 Other
2. Are alternatives to detention used in practice?
 Yes No

Article 68(3) LFIP requires an individualised assessment of the necessity to detain, and the consideration of less coercive alternatives before detention in the international protection procedure. It instructs authorities “to consider whether free residence in an assigned province and regular reporting duty as per Article 71 LFIP will not constitute a sufficient measure”. The residence and reporting obligations set out in Article 71 LFIP involve residence in a designated Reception and Accommodation Centre, a specific location or a province, and reporting to the authorities at designated intervals.⁸³⁹

The LFIP states that the competent authority may end detention at a later time following the detention order and put in place less coercive alternative measures.⁸⁴⁰ This is echoed by the RFIP, which provides that an applicant who is released from administrative detention may be required “to fulfil other obligations besides mandatory residence and notification obligation.”⁸⁴¹ Both provisions are problematic as they refer to such obligations *after* detention is lifted rather than before it is ordered.

Since 2019, it has been observed that applicants who were released after the expiry of the maximum duration of pre-removal detention were issued an Administrative Surveillance Decision (“T6”) and were obliged to regularly report to the PDMM (see [Registration](#)). This was a concerning practice, as the imposition of reporting obligations to the PDMM is as an additional restriction when detention may no longer be applied, rather than an alternative to detention.

Applicants are often ordered to report to PDMM in the Removal Centre from which they are released, or in provinces located far from their assigned “satellite cities” within tight deadlines, without necessarily possessing the means to get there. NGOs are aware of cases where clients have been obliged to discharge their reporting duties in a distant city, two, three, or even five days a week, thereby entailing disproportionate transportation and accommodation costs for applicants.⁸⁴² Sometimes they need to wait for hours in a long queue outside, without even access to toilets to fulfil their reporting duties in Istanbul.⁸⁴³ In addition, people were not properly informed of this obligation upon release from the Removal Centre.⁸⁴⁴ In 2024, this continued as stakeholders reported that many individuals were released from detention with a T6 document,

⁸³⁷ Relief Web, ‘Türkiye: Joint Submission to the Committee on the Protection of the Rights of All Migrant Workers and Members of their Families’, 2022, available [here](#).

⁸³⁸ Information provided by various stakeholders, May-June 2023.

⁸³⁹ Article 71(1) LFIP.

⁸⁴⁰ Article 68(6) LFIP.

⁸⁴¹ Article 96(5) RFIP. Article 68(6) LFIP only refers to the obligations in Article 71 LFIP where detention is lifted.

⁸⁴² Information provided by stakeholdera, February 2018, May 2023, and March- April 2024.

⁸⁴³ Information provided by a stakeholder, March 2024.

⁸⁴⁴ Information provided by a stakeholder, February 2019, May 2023.

despite having previously been registered in a province where they were living with their families. However, due to various reasons, their ID cards had become inactive, and their reporting obligations were reassigned to distant and unrelated provinces. This caused significant confusion among applicants.⁸⁴⁵

New amendments to the law in December 2019 included Article 57(A) LFIP, which lays down alternatives to pre-removal. The measures are:

- a) Residence at a specific address
- b) Notification
- c) Family-based repatriation
- ç) Return consultancy
- d) Working on a voluntary basis in public benefit services
- e) Guarantee
- f) Electronic monitoring

In September 2022, the long-awaited implementing regulation on alternative measures entered into force. The regulation establishes the possibility to apply measures that do not limit or restrict their freedom in substitution of administrative detention to an individual who was issued a deportation order.⁸⁴⁶ These measures shall not be applied for more than 24-months and non-compliance shall be a ground for imposing pre-removal detention.⁸⁴⁷ According to the regulation, alternatives can be applied to these groups of people:

- Persons whose administrative detention has been terminated;
- Persons deemed suitable for alternative duty/duties without a decision of administrative detention;
- Persons whose administrative detention has been terminated as a result of an assessment conducted by the PMM or the relevant governorate;
- Persons whose administrative detention was terminated through the decision of the governorate based on the ruling of a magistrate court.⁸⁴⁸

These individuals are ineligible for an alternative-to-detention determination.

- Persons who face a significant risk of persecution in their country of origin;
- Persons who are at risk of travelling due to severe health issues, age, or pregnancy;
- Individuals receiving treatment for life-threatening diseases;
- Victims of human trafficking who benefit from the victim support process;
- Victims of psychological, physical, or sexual violence until their treatment is completed.⁸⁴⁹

These are the alternative measures detailed in the regulation:

a) Residence at a specific address: The foreigner shall notify the PDMM of the address at which they will reside until deportation. For this measure, either a lease agreement signed by the foreigner or the written consent of the individuals with whom the foreigner will reside is required. The individual must reside in the province where the measure is applied, but they may submit a written request to move to a different province. It is necessary to submit the request to the relevant PDMM for this purpose.

b) Notification: A foreigner may satisfy this requirement in one or more of the following ways:

- Fingerprint verification;
- Voice recognition application;
- Signing in person at PDDM.

c) Family-based repatriation: Family-based repatriation refers to the obligation to ensure that irregular migrants remain with their first and second-degree relatives in Türkiye legally until the deportation order is executed. Therefore, if the foreigner who has been issued a deportation order requests in writing to be

⁸⁴⁵ Information provided by a stakeholder, May 2025.

⁸⁴⁶ Resmî Gazete, 14 September 2022, available in Turkish [here](#)

⁸⁴⁷ Ibid.

⁸⁴⁸ Ibid.

⁸⁴⁹ Ibid.

subjected to the family-based repatriation, they may remain with their first and second-degree relatives who are legally in Türkiye until the deportation order is executed. This obligation can only be fulfilled at the foreigner's request. Additionally, written consent is obtained from relatives who will reside with the applicant involved. Their relatives also agree to cooperate with the PDMM during the deportation procedure of the foreigner and to cover their travel expenses.

ç) Return consultancy: Those who have been issued a deportation order and wish to voluntarily return to their home country may receive non-monetary and monetary assistance, as determined by the PMM.

d) Working on a voluntary basis in public benefit services: The details of this obligation are not yet specified in the Regulation that states that the Ministry will determine them. Stakeholders stated that PMM officials are still working on the details required to meet the conditions set by the Ministry of Labour and Social Security⁸⁵⁰. e) Guarantee: A person may deposit a PMM-determined quantity as a guarantee for their release within the country until the deportation order is executed. According to the Regulation, the guarantee amount corresponds to 100,000 TRY, with a provision for annual increases. As of June 2025, the current amount is more than 500,000 TRY (approx. 11,000 EUR).⁸⁵¹ After delivering the deposit to the PDMM, the foreigner is no longer under administrative detention. The individual has, however, a duty to notify PDMM. Foreigners have between one and six months to leave Türkiye. If the person fails to leave within this time frame or does not comply with their obligations, the deposit amount is recorded as Treasury income. The amount of the bail shall be returned to the person or their legal representative if it is determined that the person that should have been deported has fled Türkiye, or if the administrative court overrules the deportation order. This obligation does not apply to members of terrorist organisations, their managers, or those regarded to be associated with terrorist organisations. In 2024, the trend of applying this alternative measure to “harmless” cases continued, and some PDMMs began adding the condition that the individual must leave Türkiye⁸⁵².

f) Electronic monitoring: According to the regulation, this obligation is met through a notification via a mobile application to be installed on communication devices by the person subjected to the deportation order that will allow to determine their location, or through the use of electronic clamps. Those identified as having special needs or being in a sensitive situation will be required to notify only through a mobile application. The PDMM ensures that the foreigner subject to this obligation installs the application on their communication device and is informed in writing about the application's use.

Electronic clamps can be used for the following cases:

- Persons who are the leader, member, supporter or sponsor of a terrorist organisation, criminal organisation, manager, member or supporter;
- Threats to public order or public safety or public health;
- Persons who have been determined to be associated with terrorist organisations identified by international institutions and organisations.

A foreign or legal representative may file a criminal complaint against this obligation.⁸⁵³

In practice, currently, only some alternatives are in use, lawyers were still mainly aware of their clients being asked to undertake signing in/reporting duties and being placed at a residential address.⁸⁵⁴ Financial guarantees, requiring around 11,000 euros, are seldom applied due to their high cost, and have only been used in a few instances, and family-based return is also rarely utilised in practice.⁸⁵⁵ The reporting duties are almost always given automatically for 24 months without reducing the maximum time limit. Volunteering in public services is not in practice and return counselling has not been widely implemented. Particularly, alternatives such as electronic monitoring, notification by phone cannot be implemented by the PPM due to a lack of technological infrastructure.⁸⁵⁶ There were some trainings targeting the personnel of PMM on

⁸⁵⁰ Information provided by a stakeholder, May 2025.

⁸⁵¹ Information provided by a stakeholder, June 2025.

⁸⁵² Information provided by a stakeholder, March 2025.

⁸⁵³ Ibid.

⁸⁵⁴ Information provided by stakeholders, March 2023, March 2024.

⁸⁵⁵ Information provided by stakeholders, March 2024. Alternatives to immigration detention in Türkiye: what's the European Union got to do with it? - Odysseus Network (odysseus-network.eu), available [here](#).

⁸⁵⁶ Information provided by stakeholders, June 2023, March 2024.

the referring the families with children to alternatives to detention, however there is still lack of awareness on that, and as the data is not shared, it is hard to monitor.⁸⁵⁷

Assessment for imposing alternatives to detention instead of detention is not carried out systematically and effectively. In 2024, almost in all provinces there was automatic detention when a removal order is issued and release or alternative measures are implemented after this initial detention. Unlike in previous years, the "invitation to leave" document was no longer issued. Even when an individual's international protection application had been permanently rejected and they approached the PDMM to request the issuance of a deportation order, they were instead detained. Reportedly, an unpublished protocol exists between the General Directorate of Security and the PMM to detain such individuals, despite the fact that the LFIP does not require detention in these circumstances.⁸⁵⁸ There have been instances where removal orders were cancelled and international protection or temporary protection IDs were re-issued for people who have consistently complied with alternatives to detention.⁸⁵⁹

PMM leads the development and implementation of the alternatives to the detention in Türkiye. The EU and its Member States fund international organisations like IOM, UNHCR, the Council of Europe, and ICMPD to support the establishment of a national legal framework and enhance the Turkish migration agency's capacity. These projects provide activities, training, and legal support, helping the agency protect migrants' rights and reduce dependence on detention⁸⁶⁰. According to stakeholders, despite efforts by international institutions to organize numerous meetings bringing together lawyers, NGOs, and representatives from the PMM to explore alternatives to detention, these discussions have not yet resulted in concrete changes on the ground. Stakeholders also noted limited communication between PMM and the PDMMs, observing that PMM officials often appear to learn about local practices primarily through information shared during these meetings. Topics discussed have included key issues such as access to registration. One prominent issue remains the widespread use of the T6 document—the most common alternative to detention—and the general misunderstanding among unregistered individuals who often perceive the T6 as an official identity document.⁸⁶¹ See: (Applications from detention and at the border)

In 2022, as part of the Action *"Strengthening the Human Rights Protection of Migrants and Victims of Human Trafficking in Türkiye"*, a comparative research report on the practical aspects of the application of the alternative systems in 4 countries (the UK, the Netherlands, Canada, and Austria) was published, with the aim of supporting the PMM in the preparation of secondary legislation on implementation of alternatives to immigration detention in Türkiye.⁸⁶² There have been two projects funded and carried out by the EU Delegation from 2019, focused on the enhancement of removal centres, capacity building (better process management in handling of complaints or disciplinary investigations, coordination with other ministries), alternatives to administrative detention (capacity support in the framework of international standards – two alternatives, giving signature and being placed in a residential place are already actively implemented by removal centres) and access to basic services (implementation of right based healthcare standards like the Mandela standards, access to legal aid, access to protection). With the help of said trainings, a progress has been observed especially in terms of application of different alternatives to detention in 2022.⁸⁶³ As required by the implementation regulation, each PDMM has, as of 2022, offices to monitor irregular migration, including the use of alternatives to detention.⁸⁶⁴ In 2024, several NGOs conducted trainings for lawyers that focused on alternatives to detention.⁸⁶⁵

⁸⁵⁷ Information provided by stakeholders, March 2024.

⁸⁵⁸ Information provided by a stakeholder May 2025.

⁸⁵⁹ Information provided by various stakeholders, June 2023.

⁸⁶⁰ EU Migration Law Blog, 17.01.2024, The EU support for alternatives to immigration detention in Türkiye: a curious case at odds with EU's external migration policy? – EU Immigration and Asylum Law and Policy (eumigrationlawblog.eu) & Information provided by a stakeholder, March 2024, available [here](#).

⁸⁶¹ Information provided by a stakeholder, February 2025

⁸⁶² Council of Europe, 'Strengthening the Human Rights Protection of Migrants and Victims of Human Trafficking in Turkey', 2022, available [here](#).

⁸⁶³ Information provided by a stakeholder, June 2023.

⁸⁶⁴ Information provided by a stakeholder, June 2023.

⁸⁶⁵ Refugee Rights Türkiye, Specialization Seminar: "Administrative Detention and Alternatives to Administrative Detention: National and International Regulations and Appeal Procedures" 21.02.2024, available [here](#).

UNHCR and IOM lead an EU-funded project “Supporting the Capacity of Removal Centres and Developing Alternative Measures to Administrative Detention”⁸⁶⁶, which aims to support the institutional capacity of Removal Centres, strengthening procedural measures for access to rights and services in Removal Centres, and searching alternative implementations to administrative detention. There are two finalised and one ongoing project led by ICMPD. ENACT⁸⁶⁷ (Enforcing Capacities for Application of Alternative Measures to Detention in Türkiye) project funded by the Swiss Confederation, State Secretariat for Migration, from September 2023 to July 2025 aims to enhance the PMM’s efforts in effective, harmonised and human rights-based implementation of the alternatives to detention by strengthening operational and technical capacity and enhanced cooperation and coordination among institutions as well as by raising the awareness of the migrants and relevant stakeholders in Türkiye.

3. Detention of vulnerable applicants

Indicators: Detention of Vulnerable Applicants

1. Are unaccompanied asylum-seeking children detained in practice?
 - Frequently Rarely Never
 - ❖ If frequently or rarely, are they only detained in border/transit zones? Yes No
2. Are asylum seeking children in families detained in practice?
 - Frequently Rarely Never

Unaccompanied children international protection applicants should be categorically excluded from detention, since they must be placed in appropriate accommodation facilities under the authority of the Ministry of Family and Social Services.⁸⁶⁸ Committee on the Rights of the Child highlights the concern that asylum-seeking and refugee children, including those who are unaccompanied and separated, are at a high risk of being held in immigration detention⁸⁶⁹. In practice, however, unaccompanied children often declare being over the age of 18 to avoid separation from their groups.⁸⁷⁰ There were cases where, with the purpose of taking them under administrative detention, minors were registered to be accompanied by the adults in the group they entered Türkiye with even if they do not have any connection to such adults⁸⁷¹. Incidents where minors are kept under detention together with adults and not in separate locations are common.⁸⁷² According to the law, children at risk and children convicted of an offence should be transferred to Child Support Centres (*Çocuk Destek Merkezleri*, ÇODEM).⁸⁷³

Unaccompanied asylum-seeking children who undergo age testing are legislatively assigned to specific authorities for accommodation until their test results are known. However, despite the absence of an administrative detention decision, these children often face prolonged stays in detention centres during this process⁸⁷⁴. A significant issue to highlight is that, in practice, all asylum-seekers, including unaccompanied asylum-seeking children, are subjected to administrative detention rather than alternative measures, despite legislative provisions allowing for such alternatives. The justification for not using alternative measures is not provided. Although administrative surveillance can be applied under specific circumstances defined by law, it is often implemented arbitrarily, resulting in the unnecessary detention of unaccompanied asylum-seeking children⁸⁷⁵. In 2024, Afghan boys who claimed to be over 16 years old were often held in Removal Centers under administrative detention on the grounds that they appeared older.⁸⁷⁶

⁸⁶⁶ PMM, Ongoing Projects, available [here](#).

⁸⁶⁷ ICMPD, Enforcing Capacities For Application Of Alternative Measures To Detention in Türkiye (ENACT) Project, available [here](#).

⁸⁶⁸ Article 66(1)(b) LFIP.

⁸⁶⁹ Committee on the Rights of the Child Concluding observations on the combined fourth and fifth periodic reports of Türkiye, available [here](#).

⁸⁷⁰ Information provided by a stakeholder, February 2019, May 2023 and March – April 2024.

⁸⁷¹ Information provided by a stakeholder, March 2024.

⁸⁷² Information provided by various stakeholders, June 2023.

⁸⁷³ Regulation No 29310 of 29 March 2015 on Child Support Centres, available in Turkish [here](#).

⁸⁷⁴ Mülteci Hakları Merkezi, Türkiye’deki Refakatsiz Sığınmacı Çocukların Hukuksal Korumaya Erişimi: Tespitler ve Değerlendirmeler, September 2022, available [here](#).

⁸⁷⁵ Ibid.

⁸⁷⁶ Information provided by multiple stakeholders February, March and April 2025.

It is very common for LGBTIQ+ persons prefer to live in certain cities such as metropolitan cities (Istanbul, Izmir) or cities where their communities live (the cities which are used to be satellite cities), even though they are registered in another city. Thus, LGBTIQ+ persons are at particular risk of detention when apprehended outside their assigned province. In several removal centres (Previously Tuzla, and Şanlıurfa) they are detained with other groups, for instance, a transgender person staying with men, which makes them very vulnerable to any type of violence and discrimination. Also, it is problematic for transgender people to continue their hormone treatment during detention.⁸⁷⁷ Sometimes they faced social isolation in the removal centres, not being able to access open air as much as one should.⁸⁷⁸ Discrimination may also occur with isolation, therefore the reason for isolation must be addressed. In 2024, stakeholders observed that some trans women were detained in the Çatalca (İnceğiz) Removal Center, which is designated for female detainees. This was seen as a small step towards preventing discrimination.⁸⁷⁹ However, in 2024, arbitrary detention and poor detention conditions for LGBTIQ+ individuals persisted.⁸⁸⁰ Moreover, sex workers and (potential) victims of trafficking are also a category of persons detained in Removal Centres for reasons of public order and public health under Article 57 LFIP, though not necessarily engaging with the international protection procedure. Although sex work is not prohibited in Türkiye, working without a permit is a ground for deportation and detention; consequently, the majority of detentions were based on the absence of a work permit. In 2022 and 2023, sex workers sought help from the removal centres of **Ankara, Aydın, İstanbul** and **Kütahya**.⁸⁸¹ In 2024, stakeholders reported that the practice of requiring detained sex workers to undergo blood testing continued.⁸⁸²

People with HIV were also subject to discriminatory practices. In 2023, a person who was separated from other detainees and after the appeal, their situation was improved however the person was deported under the voluntary return scheme.⁸⁸³ In 2024, an individual who was diagnosed as HIV-positive during a blood donation was apprehended and placed in administrative detention on the grounds of threatening public health (G-78 restriction code) and was subsequently unable to access necessary medication.⁸⁸⁴ A stakeholder reported the case of a Syrian national whose temporary protection ID was cancelled due to an attempt to irregularly cross the Turkish Greek border. He was subsequently apprehended and transferred to Ayvacık Removal Center. After his apprehension, he disclosed his HIV-positive status—a fact he had not even shared with his family—solely in order to access his medication while in detention. Despite this disclosure, he was not provided access to treatment. Instead, he was placed in solitary confinement, and a sign reading 'There is a person with AIDS in this room' was posted on his door.⁸⁸⁵

Vulnerability based on medical reasons is difficult to prove and such claims are often viewed as bad-faithed by the administration. It is not possible to obtain a medical report showing the disability or other medical conditions for irregular migrants.⁸⁸⁶

4. Duration of detention

Indicators: Duration of Detention

- | | |
|--|---------------|
| 1. What is the maximum detention period set in the law: | |
| ❖ Asylum detention | 1 month |
| ❖ Pre-removal detention | 12 months |
| 2. In practice, how long in average are asylum seekers detained? | Not available |

⁸⁷⁷ Information provided by stakeholder, March 2024.

⁸⁷⁸ KAOS GL, 06.12.2023, 10 şehirden avukatlar, mülteci LGBTIQ+'ların hakları için buluştu, available [here](#).

⁸⁷⁹ Information provided by multiple stakeholders May 2025.

⁸⁸⁰ T24, Geri gönderme merkezinde tutulan LGBTIQ+'lar için "serbest bırakın" çağrısı; "Haklarında sınır dışı kararı yok!", 26.10.2024, available [here](#); KAOS GL, 25 Kasım'da gözetimden geri gönderme merkezlerinde kötü muameleye..., 10.12.2024, available [here](#).

⁸⁸¹ Information provided by stakeholders, June 2023 and March 2024.

⁸⁸² Information provided by a stakeholder, May 2025.

⁸⁸³ Information provided by a stakeholder, March 2024.

⁸⁸⁴ Emep, Geri gönderme merkezinde HIV Pozitif mülteciye kötü muamele, 18.07.2024, available [here](#).

⁸⁸⁵ Information provided by a stakeholder, May 2025.

⁸⁸⁶ Information provided by various stakeholders, June 2023 and March 2024.

Administrative detention in the international protection procedure is permitted for up to 30 days.⁸⁸⁷ Pre-removal detention, on the other hand, may be ordered for 6 months, subject to the possibility of extension for another 6 months.⁸⁸⁸ However, migrants might re-detained after being released at the end of this period, undermining these time limits.⁸⁸⁹

In current practice, since the law allows for persons who register an international protection application to remain in pre-removal detention without a separate detention order under Article 68 LFIP (see [Grounds for Detention](#)),⁸⁹⁰ lawyers and other experts are aware of several cases where the persons concerned were never communicated Article 68 detention orders and held in detention for more than 30 days while their asylum application was processed by the PDMM, in clear violation of the law.

Persons facing removal have to be transferred to a Removal Centre within 48 hours of the issuance of the detention order.⁸⁹¹ As the Constitutional Court clarified in its *B.T.* judgment in 2017, this means that a person can only be detained in a police station for a maximum of 48 hours before being transferred to a Removal Centre.⁸⁹² In provinces such as **İstanbul** and **İzmir**, detention exceeding the 48-hour deadline has been reported as a practice, even more than 15 days⁸⁹³ (see [Unofficial detention facilities](#)) In 2024, individuals under administrative detention were generally released after the maximum legal period of 6+6 months. However, some stakeholders reported that, in certain cases, this time limit was exceeded, with applicants being held for several additional days or even weeks.⁸⁹⁴

C. Detention conditions

1. Place of detention

Indicators: Place of Detention

1. Does the law allow for asylum seekers to be detained in prisons for the purpose of the asylum procedure (i.e. not as a result of criminal charges)? Yes No
2. If so, are asylum seekers ever detained in practice in prisons for the purpose of the asylum procedure? Yes No

The LFIP clearly differentiates between administrative detention for the purpose of removal and detention in the international protection procedure, which are governed by Articles 57 and 68 respectively. In practice, however, applicants for international protection are detained in Removal Centres.

1.1. Removal Centres

In 2024 there are 32 removal centres in 25 provinces with a total detention capacity of around 1718,780. In 2024 approximately 350,000 individuals remained in removal centres. **İzmir** (Harmandalı), **Kırklareli**, **Gaziantep**, **Erzurum**, **Kayseri** and **Van** (Kurubaş) were initially established as Reception and Accommodation Centres for applicants for international protection under EU funding, prior to being repurposed as Removal Centres (see [Types of Accommodation](#)). The facility located in **İğdır** and two of three facilities in **Arnavutköy** are listed as temporary Removal Centres. Stakeholders stated that the facility in **İğdır** was not in use in 2024.⁸⁹⁵ Aydın and Aycacık was temporarily closed for maintenance. Their total

⁸⁸⁷ Article 68(5) LFIP.

⁸⁸⁸ Article 57(3) LFIP.

⁸⁸⁹ Global Detention Project and International Refugee Rights Association, Türkiye Joint Submission to the UN Committee on the Rights of the Child 93rd Session, 8 – 26 May 2023, 14 April 2023 & Information shared by stakeholders March – April 2024.

⁸⁹⁰ Article 96(7) RFIP.

⁸⁹¹ Article 57(2) LFIP.

⁸⁹² Constitutional Court, *B.T.*, Decision 2014/15769, 30 November 2017, available [here](#).

⁸⁹³ Information provided by various stakeholders, February 2019, March 2020, May 2023 and March 2024.

⁸⁹⁴ Information provided by multiple stakeholders, April 2025.

⁸⁹⁵ Information provided by multiple stakeholders April 2025.

capacity was planned to reach 19,000 by the end of 2024,⁸⁹⁶ while there is a plan to soon build 8 more centres.⁸⁹⁷

The locations and capacities of Removal Centres are listed as follows:

Capacity of pre-removal detention centres in Türkiye	
Pre-removal detention centre	
Adana	İstanbul (Binkılıç)
Ağrı	İstanbul (Çatalca İnceğiz)
Ankara	İstanbul (Tuzla-Konteyner)
Antalya	İstanbul (Arnavutköy Temporary 1)
Aydın	İstanbul (Arnavutköy Temporary 2)
Balıkesir	İzmir (Harmandalı)
Bayburt	Kayseri
Bursa	Kırklareli (Pehlivan köyü)
Çanakkale	Kocaeli
Çankırı	Kütahya
Edirne	Malatya 1
Erzurum 1	Malatya 2
Erzurum 2	Muğla
Gaziantep (Oğuzeli)	Niğde
Iğdır (temporary)	Şanlıurfa
İstanbul (Arnavutköy)	Van (Kurubaş)

Source: PMM, *Removal centres*, available at: <https://bit.ly/3rjWEhz> & PMM, *Faaliyet Raporu 2023*, available at: <https://bit.ly/3LNM5uo>.

Hatay removal center was heavily damaged and afterwards demolished. The removal center in Malatya was temporarily repurposed and serves as an accommodation facility for the earthquake victims. Adana removal center was also damaged by the earthquake, yet the facility remains operational as a detention facility.⁸⁹⁸

In **İstanbul**, the Çatalca (İnceğiz) Removal Centre is for women, **Binkılıç** for men. These removal centres mostly accommodate ex-convicts or refugees involved in criminal cases. A removal centre was established in **Tuzla** for men with a capacity of 700. At the beginning of 2024, the Arnavutköy premises were opened, comprising removal centres, a temporary accommodation centre, and a GÖKSEM. The facility has been used both as a pre-detention centre and as a removal centre, facilitating smoother transfers between detention units compared to previous practices at Pendik. In 2024, persons apprehended in Istanbul were directly transferred from police stations to Arnavutköy. Some, mostly Syrian men and families along with individuals of other nationalities, remained in Arnavutköy as a removal centre. Afghan men were predominantly transferred to Binkılıç, women to Çatalca, and nationals primarily from Turkmenistan,

⁸⁹⁶ PMM Faaliyet Raporu 2024, available [here](#).

⁸⁹⁷ European Migration Law Blog, 17.01.2024, The EU support for alternatives to immigration detention in Türkiye: a curious case at odds with EU's external migration policy, available [here](#).

⁸⁹⁸ Information provided by a stakeholder, March 2024.

Uzbekistan, Morocco, Tajikistan, and Pakistan were sent to Tuzla.⁸⁹⁹ A stakeholder reported that, on a daily basis, a bus departs from Arnavutköy for deportation procedures.

In 2024, the major problem faced by lawyers has remained as to determine the removal centre where the client is being held. PDMM does not share information on where the person is being held and it is impossible to reach the removal centres via phone. Lawyers must proactively search for their clients in each removal centres, which may take to a couple of days.⁹⁰⁰ Sometimes, due to the misspelling of the client names, lawyers might be misinformed about the presence of their clients in the centre. The number of transfers between the centres increased significantly in 2024. Uninformed, sudden transfers are happening from one centre to another centre in different cities. For example, a detainee may be transferred from Ağrı to Erzurum, and eventually end up in Istanbul. The reason for these transfers is not fully known by the stakeholders.⁹⁰¹ This practice may undermine detainees' right to access legal representation, as lawyers are not always informed of their clients' whereabouts. Even when they are, it can be challenging for a single lawyer to travel across the country or to coordinate with a local colleague within the seven-day legal time limit.⁹⁰²

In 2024, following complaints about the conditions at the Antalya Removal Center, 14 individuals were transferred to the Van Removal Center.⁹⁰³

Also in 2024, a group of lawyers publicly stated that they had lost contact with at least 35 of their clients, who were reportedly being held in the Şanlıurfa Removal Center. However, PDMM authorities denied that these individuals were in custody at the facility.⁹⁰⁴ Subsequently, the Presidency of Migration Management (PMM) issued a public statement denying the allegations.⁹⁰⁵ Finally, the lawyers issued a follow-up statement, sharing their clients' accounts of the incident.⁹⁰⁶

In **Istanbul**, refugees are generally not informed about their rights in removal centres. In 2024, the mobile migration points were active and referring the ones who has problems with their IDs or criminal records to Arnavutköy Removal centre, still, there were some cases where regular migrants were sent to the removal centre due to not carrying their IDs.⁹⁰⁷ Under a project implemented by IOM, information booklets, posters, and videos were prepared in 11 different languages to be used in the removal centres, to provide detailed information about their rights, including accessing to legal aid, the procedures to apply international protection, the contact details of bar associations, and the function of removal centres.⁹⁰⁸ However, there are still challenges to access the information regarding the international protection application procedures in the removal centres.

The Presidency of Migration Management (PMM) does not publicly share official data on the capacities of Removal Centres (RCs) in Türkiye. According to TİHEK, the capacity of Adana RC is 450, Ağrı RC has a normal capacity of 850 which can be increased to 1,000, and Akyurt RC accommodates up to 1,000 individuals. Antalya RC has a base capacity of 168, with the possibility of expanding to 250 depending on occupancy levels. Similarly, Binkılıç RC is reported to have a standard capacity of 384, though this can be increased during periods of mass deportations. In Bursa RC, the women's section can host 50 persons, while the men's section accommodates 150. Edirne RC can normally host 520 people, with the potential to increase to 586 if needed. Kütahya RC has a capacity of 400, and Şanlıurfa RC can accommodate up to 523 persons. In addition to these figures, stakeholders have reported that the Inceğiz RC has a capacity of approximately 400, Arnavutköy RC around 1,500, and Kurubaş RC about 700.⁹⁰⁹

⁸⁹⁹ Information provided by a stakeholder, March 2024.

⁹⁰⁰ Information provided by stakeholders, May 2023, Information provided by stakeholders, March 2024.

⁹⁰¹ Information provided by stakeholder, March – April 2024.

⁹⁰² Information provided by stakeholders, March 2021, May 2023 and March – April 2024, March, April and May 2025.

⁹⁰³ Gazete Duvar, Antalya GGM'deki 14 mülteci Van'a gönderildi: 'İşkenceyi haber verdik, cezalandırdık', 23.04.2025, available [here](#).

⁹⁰⁴ Bianet, İstanbul'da gözaltına alınan 35 mülteci haber alınamıyor, 13.02.2024, available [here](#).

⁹⁰⁵ Göç İdaresi Başkanlığı, X (Twitter), 18.02.2024, available [here](#).

⁹⁰⁶ Serbestiyet, "Geri Gönderme Merkezleri 5 yıldız standardında ise hodri meydan: Aktivistler ve avukatlar olarak bu GGM'leri heyet halinde gezelim", 19.02.2024, available [here](#).

⁹⁰⁷ Information provided by a stakeholder, March 2024.

⁹⁰⁸ Information provided by a stakeholder, March 2024.

⁹⁰⁹ TİHEK, Ziyaret Raporları, available [here](#); Information provided by multiple stakeholders, June 2025.

1.2. Airport holding facilities and police stations

There is a border facility for persons refused entry into Türkiye (“inadmissible passengers”) at international airports. These include **İstanbul** Airport, İstanbul Sabiha Gökçen Airport, **Ankara** Esenboğa Airport and **İzmir** Adnan Menderes Airport (see [Access at the airport](#)).

The authorities generally do not consider holding in transit zones as a deprivation of liberty, although a Council of Europe report of 2016 refers to them acknowledging that persons held in such facilities are deprived of their liberty.⁹¹⁰ In the case of an Iranian with an execution warrant in Iran who obtained a residence permit in Mexico and previously resided in Türkiye, the individual was deported to Türkiye. The individual did not want to remain in the country and wished to seek asylum in another Latin American country. However, police in the transit zone made him access the ‘inadmissible passenger’ zone, and he has since been detained there against his will.⁹¹¹

Police stations can be used for short-term detention of up to 48 hours prior to a Removal Centre.⁹¹² These are used in practice in provinces such as **İstanbul and İzmir**.

1.3. Unofficial detention facilities

For the last 6 years, stakeholders have been reporting a number of practices consisting of *de facto* detention of people in facilities (for more information, see AIDA 2020, 2021 and 2022 updates) e.g. sport halls in different provinces, without a detention order, prior to being transferred to a Removal Centre or to signing voluntary return documents. It is not clear whether these centres are managed by PMM or the Directorate General for Security Affairs. In 2024, the persistence of these practices was confirmed.

Ağrı and Iğdır: Irregular migrants are primarily detained at the border and detained at a police station or in a warehouse located in the Gendarmerie’s police park close to the border. Detained irregular migrants’ access to facilities such as toilets is problematic. Occasionally, detention exceeds 48 hours.⁹¹³

İstanbul: In İstanbul Arnavutköy Premises is used as an intermediate place to transfer third country nationals to the relevant removal centres and detention time exceeds 48 hours most of the time⁹¹⁴. Foreign citizens involved in a legal case were kept at the police station until called by the PDMM. They were kept for 2-3 days, sometimes even 10 days, sometimes elderly people or people with health problems can be held⁹¹⁵. In 2024, according to stakeholders, the waiting period in police stations was reduced, and individuals were transferred to Arnavutköy more swiftly.⁹¹⁶ Arnavutköy is also known by temporary accommodation center in İstanbul Arnavutköy,⁹¹⁷ according to observation of some stakeholders, when a Syrian without registration or ID is identified by mobile migration points, they are referred to this center before being transferred to other centers or removal centers.⁹¹⁸ In 2024, some Afghan families were held in the Arnavutköy Temporary Accommodation Center without a clear legal basis. In Arnavutköy police building, sometimes 30 people are held in a very small container, there is a hygiene problem, although there have been some improvements in 2024, the conditions are still not suitable, especially in cases where temporary holds are extended.⁹¹⁹

Aydın, İzmir: In İzmir, attorneys report that three containers have been constructed in front of the removal centre to detain all apprehended irregular migrants under poor and unclean conditions, including families

⁹¹⁰ Council of Europe Special Representative for Migration and Refugees, *Report of the fact-finding visit to Türkiye*, 10 August 2016, para IX.1(a).

⁹¹¹ Information provided by a stakeholder, May 2023.

⁹¹² Article 57(2) LFIP.

⁹¹³ Information provided by stakeholders, May 2023 and March 2024.

⁹¹⁴ Information from a stakeholder, May 2022.

⁹¹⁵ Information provided by a stakeholder, March 2024.

⁹¹⁶ Information provided by multiple stakeholder April and May 2025

⁹¹⁷ Yenibirlik, 12.04.2024, Vali Gül, Arnavutköy Geçici Barınma Merkezi’ni ziyaret etti, available [here](#)

⁹¹⁸ Information provided by stakeholders, March 2024.

⁹¹⁹ Information provided by a stakeholder, March 2024 And May 2025

with children.⁹²⁰ The Izmir Solidarity Platform with Refugees investigated claims that refugees were held in vacant and wedding areas managed by the Karaburun municipality, confirming these locations are used and noting the conditions violate basic human rights. Officers justify prolonged detentions due to delays caused by the Izmir Removal Centre.⁹²¹ In 2024, a stakeholder described the acceptance procedure at Aydın and Harmandalı Removal Centers as disturbing. During the initial examination process to determine whether individuals would be placed under administrative detention, they were reportedly made to wait in an open basketball court, exposed to harsh weather conditions without adequate shelter or privacy—even for families or women. Although some container units were later installed, the conditions remained inadequate⁹²². In 2023, in Karaburun, on the roof of a venue with one toilet, a group of 50 people, including children were detained for more than 10 days without any phone to be able to reach out to lawyers.⁹²³ In 14.10.2024, TİHEK conducted a visit to the Karaburun District Police Station and recommended that the authorities improve the conditions.⁹²⁴ In Dikili migrants were kept in an enclosed place on the top of a hill, with only providing blanket and food. It is a common practice to hold the migrants in the yard of police or gendarme stations in Aydın, a group of migrants were kept in a basketball field until they were accepted to the removal centre.⁹²⁵ Sometimes, the waiting period at the police station was exceeding 10-15 days, one of the reasons of these delays was lack of capacity to organise a swift transfer process; this situation seems to have improved recently.⁹²⁶

Adana, Gaziantep, Kahramanmaraş, Hatay, Kilis, Şanlıurfa and Malatya: Syrians entering Türkiye are transferred to camps (temporary accommodation centres) as a result of a policy change implemented on 6 June 2022. This practice is based on article 8 of the TPR, which is essentially closed to judicial review. Admission to the temporary accommodation centre is in the hands of PDMM, and PDMM is under no obligation to issue a rejection decision. An unpublished circular dated 06.06.2022 outlined four exceptions to the requirement of staying in Temporary Accommodation Centres (TACs): (1) children of individuals exempt from TAC residence; (2) those for whom travel is not advisable due to health conditions; (3) individuals married to Turkish citizens or to foreigners legally residing in Türkiye under a residence permit, work permit, or international protection status, along with their children; and (4) individuals with special needs who are not suitable for placement in TACs, as well as their dependent children. However, the implementation of these exceptions has continued to vary in practice. Once rejected from accessing the camp, the only alternative for Syrians is to "voluntarily return" to Syria. Hence, the camps have become a new form of detention facility for Syrians who are either not registered under the temporary protection regime or have had their temporary protection status revoked. PMM has created a new form of 'impunity' without a transparent legal remedy. Syrians have no access to lawyers or their families from the camps. However, lawyers do have access to the camps. Individuals detained in the temporary accommodation centres often face indefinite detention, unlike those in regular detention centres, which have a maximum detention period of up to 12 months. Immigration lawyers believe that the indefinite detention in these centres aims to hinder Syrians from appealing deportation decisions or to coerce them into signing voluntary return forms⁹²⁷. It is claimed that majority of Syrians who stay in Kilis and Nizip temporary accommodation centres are returned back to Syria, there are concerns among stakeholders about the voluntariness of these returns⁹²⁸.

The practices implemented in Temporary Accommodation Centers (TACs) across Türkiye remain inconsistent and subject to frequent changes, making them difficult to monitor systematically. A commonly observed procedure follows a three-step apprehension framework for individuals without updated addresses or documentation: Upon the first apprehension, individuals are issued a formal notification to return to their registered province and sign regularly. On the second apprehension, their identity document is deactivated, and they are required to reactivate it and register within 15 days. If apprehended a third time, their identity document is cancelled, and they are transferred to a TAC. According to the activity

⁹²⁰ Information provided by a stakeholder, May 2023.

⁹²¹ Evrensel Sayfaları, 'İzmir Mülteci Dayanışma Platformu: Mülteciler insani olmayan koşullarda tutuluyor', 2022 available in Turkish [here](#)

⁹²² Information provided by a stakeholder, April 2025

⁹²³ Information provided by a stakeholder, March 2024.

⁹²⁴ TİHEK, İzmir Karaburun İlçe Emniyet Müdürlüğü Nezarethaneleri Ziyareti Raporu, 2025/09, available [here](#)

⁹²⁵ Information provided by a stakeholder, March - April 2024.

⁹²⁶ Information provided by a stakeholder, March - April 2024.

⁹²⁷ Global Detention Project, Türkiye: Submission to the Committee against Torture, 12 June 2024, available [here](#)

⁹²⁸ Information provided by a stakeholder, March 2024.

report and strategic plan of PMM, The function of TACs is planned to be revised so that only persons with special needs are accommodated in designated centres, while other TACs are to be used for unregistered Syrians and those who do not fulfil their obligations.⁹²⁹

During the aftermath of the February 2023 earthquakes, TACs were used to temporarily host affected individuals, including those not previously accommodated. However, some residents were later incentivized to leave, sometimes with promises of future registration in designated urban areas. In practice, such promises were not always fulfilled. For instance, individuals transferred from TACs in Gaziantep and Şanlıurfa were unable to complete their registrations, leaving them in legal limbo.

Nizip (Gaziantep) In August 2023, Nizip TAC hosted earthquake-affected individuals. As part of a gradual decongestion policy, some residents were released with travel permits regardless of their registered address being in "open" or "closed" provinces. However, requests for relocation, such as those made by families seeking to move to Şanlıurfa, were often denied. Some individuals faced difficulties accessing transfer procedures. As mobile migration units were established, persons without registration were increasingly admitted. Due to long waiting lines and high demand for appointments, a dedicated data update desk was temporarily set up at the center. The admission criteria also fluctuated over time—at one point, only women and children were accepted, a practice not officially documented but reportedly applied. While initially framed as a data update initiative, the center functioned as a de facto control site. Arbitrary detention practices were also reported, particularly targeting women and children.

Elbeyli TAC (Kilis) Elbeyli TAC has been associated with reports of coercive and unlawful practices concerning returns to Syria. There are claims of individuals being held in cold storage facilities and exposed to physical abuse. Some reported that documents signed under duress bore visible traces of violence, including blood stains. Legal action was reportedly impeded by issues related to representation and power of attorney. In certain cases, authorities allegedly attempted to deport minors without a parent present, assigning them to unrelated adults as guardians. Although families were in theory given an option to exit the GBM, this practice was sometimes exploited through coerced signatures on voluntary return forms. Initially, single men were held in the facility, but by March–April 2024, families also began to be admitted. These developments coincided with the expansion of mobile migration units, particularly from February 27, 2024 onward.

Harran (Şanlıurfa): In 2024, one of the most significant developments was the transfer of international protection applicants—mostly Afghans who submitted their applications that same year—to the Harran Temporary Accommodation Center (TAC) without a clear legal basis. These individuals had successfully lodged their applications from within removal centres; for instance, all applicants who submitted international protection claims at the Kurubaş Removal Center were subsequently transferred to Harran TAC for the examination of their claims. As these detention practices lacked a legal foundation, lawyers often refrained from challenging the transfers, viewing access to registration under international protection as too valuable to jeopardize. Some stakeholders also reported that certain Afghan nationals were held at Harran TAC before being transferred to other removal centres for standard administrative detention procedures. There were also observations that Afghan nationals who were previously IP applicants but travelled outside their provinces of residence were first transferred to Harran TAC upon apprehension. In one case, an individual registered with Denizli PDMM was notified of the deemed withdrawal of their application with Denizli PDMM's approval while at Harran TAC. Another individual, registered with Malatya PDMM, received the same notification. Upon returning to Malatya Province, Malatya PDMM officials reportedly destroyed the original document and issued a new one themselves, as required. Stakeholders noted that PDMM assigns officials who are experts in IP to handle such cases.

In 2024, according to stakeholders, Syrian nationals held in the Kilis Elbeyli and Harran Temporary Accommodation Centers (TACs) could be released if they were able to demonstrate family unification. However, single men were generally kept in detention. Some individuals reportedly got married while inside the TACs in an attempt to meet this condition. Despite this, in certain cases, individuals who were awaiting release were instead forced to sign voluntary repatriation forms and were returned to Syria.⁹³⁰

⁹²⁹ PMM, Faaliyet Raporu 2024; PMM Stratejik Plan 2024-2028.

⁹³⁰ Information provided by multiple stakeholders, March 2025.

In 2024, the Hatay Apaydın facility was used as a referral center. Individuals apprehended in the region were first transferred there, where they were assessed to determine whether they would be transferred to a Removal Center or forcibly returned to Syria.⁹³¹

When people are identified without an ID, they are taken to temporary accommodation centres (now called status referral centres) where fingerprints and security checks are conducted, and if there is no involvement in the case or YTS (foreign terrorist fighter), they are released. In 2023, stakeholders observe that those who are released from the centre, could access registration, some are given appointments, and some are waiting. Some of these temporary accommodation centres were also affected by the earthquakes⁹³². In 2024, Nizip Temporary Accommodation Centre (TAC) was used as a status referral centre, but it also continued to function as a detention facility.⁹³³

As per the announcement, GÖKSEM (Referral Centers for Irregular Immigrants), which started operating on December 8, 2023⁹³⁴, aim to detain irregular immigrants apprehended by law enforcement until administrative procedures, including criminal interrogation and health checks, are completed. This centralised detention facility represents a heightened focus on immigration enforcement, reflecting the government's prioritisation of security measures. In 2024, aside from the ongoing problems related to transfers from police stations to Removal Centers, other issues—such as prolonged assessment processes for admitting individuals to Removal Centers—persisted.⁹³⁵

2. Conditions in detention facilities

Indicators: Conditions in Detention Facilities

- | | | |
|---|---|-----------------------------|
| 1. Do detainees have access to health care in practice? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ❖ If yes, is it limited to emergency health care? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

All Removal Centres in Türkiye are under the authority of PMM and each centre is managed by a director.⁹³⁶ The LFIP makes no explicit provision on conditions of detention of applicants for international protection. However, Article 4 of the Removal Centres Regulation provides that “The establishment, operation and operation of the Centres and the fulfilment of the services to be provided under this Regulation shall be carried out according to the following principles and procedures:

1. Protection of the right to life;
2. Human-centred approach;
3. Observing the best interests of the unaccompanied child;
4. Priority to applicants having special needs;
5. Confidentiality of personal information;
6. Informing the persons concerned about the operations to be performed;
7. Social and psychological strengthening of the housing;
8. Respect for the freedom of beliefs and worship of the people
9. Providing services to the residents without discrimination based on language, race, colour, sex, political thought, philosophical belief, religion, sect and similar reasons.”

Removal Centres are required to provide among others: accommodation and food; security; emergency and basic health care services; psychological and social support.⁹³⁷

In 2017, in line with the monitoring provisions of the Regulation,⁹³⁸ PMM instructed all the mayoralities managing a Removal Centre to set up dedicated Migration Commissions comprising of experts, academics, civil society, officials from health and education institutions and municipality representatives, tasked with

⁹³¹ Information provided by multiple stakeholders, March 2025.

⁹³² Information provided by a stakeholder, March 2024.

⁹³³ Information provided by a stakeholder, March 2025.

⁹³⁴ İçişleri Bakanımız Sayın Ali Yerlikaya İl Göç İdaresi Müdürleri Değerlendirme Toplantısında Konuştu, 16.01.2024, available [here](#).

⁹³⁵ Information by multiple stakeholders, April and May 2025.

⁹³⁶ Article 11 Removal Centres Regulation.

⁹³⁷ Article 14(1) Removal Centres Regulation.

⁹³⁸ Article 16 Removal Centres Regulation.

regular visits to the centres. The composition of the commission depends entirely on each mayoralty. Generally, Türk Kızılay is present in these commissions.⁹³⁹ The commission convened once in 2024 and once in 2025, primarily to discuss the ongoing efforts to combat irregular migration.⁹⁴⁰

In 2024, as part of the Action “*Strengthening the Human Rights Protection in the Context of Migration in Türkiye*”⁹⁴¹ more than 200 lawyers from eight Bar Associations across Türkiye —including İstanbul, İzmir, Adana, Kahramanmaraş, Mardin, Bursa, Mersin, and Ankara — participated in a series of cascade training sessions aimed at strengthening their knowledge of immigration detention standards.⁹⁴²

2.1. Material conditions in detention

Conditions in Removal Centres vary from one facility to another. Lack of capacity in terms of staff and spaces are the most mentioned common problem regarding the conditions in the centres⁹⁴³. As a result of holding more people than their capacities, there are problems with access to water, and hygiene. The common implementation in most of the centres to access open air is around one hour after each three meals, there was information that the Kocaeli centre was not providing this access.⁹⁴⁴ Detainees are not being able to complain when they are exposed to rights violations, which causes a lack of information regarding the conditions in the centre. On the other hand, accessing information regarding their rights is also challenging⁹⁴⁵. Many centres lack recreation or outdoor play areas, and children sometimes do not even have their own beds and despite the explicit requirements of Article 59/ç of the LFIP, educational opportunities are insufficient in every detention center.⁹⁴⁶

According to TIHEK report on **Tuzla** removal centre, there are some hygiene issues, with scabies cases reported in summer due to non-compliance with hygiene rules, and lack of enough personnel. For instance, the Psycho-Social Service Unit staff reported that they meet each foreigner within 48 hours, but the meetings are unproductive five-minute meetings. Accessing phones is problematic, as their phones are being confiscated and stored, hindering their communication as they cannot recall phone numbers. Transgender women face some bad treatment by gendarmeries in the centres, are being put in the same place as men and are facing problems accessing hormone drugs. In 2023 there was a case where an Afghan transgender woman was subjected to physical violence, and her basic needs were not provided. The challenges mentioned for Tuzla are common in other centres, for instance, in İstanbul, İzmir, and Ankara.⁹⁴⁷ In 2024, stakeholders reported that poor treatment of detainees and overcrowding persisted. In 2025, an incident involving misconduct was reported to YİMER, and a concrete response was observed following the complaint.

In **Çatalca (İnceğiz)**, there were complaints of ill-treatment, including reports that detainees were punished by being denied food.⁹⁴⁸ In **Binkılıç**, there have been difficulties in reaching out to the individuals. During the winter, the heating system was reportedly not functioning, and due to overcrowding, many individuals were forced to sleep on the floor. Incidents of violence were also reported. In Arnavutköy, there have been reports and rumours that the lights in the facility remain on 24 hours a day. In **Pehlivan köyü**, especially during summer, there were various epidemic diseases, scabies, and skin diseases, due to the difficulties in cleaning and access to water. In **Erzurum**, similar problems were observed regarding hygiene problems, not being able to access water, and lack of information on their rights and processes. In **Van**, due to both

⁹³⁹ Information provided by a stakeholder, February 2018.

⁹⁴⁰ T.C. Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya'nın Başkanlığında 14. Göç Kurulu Toplantısı Gerçekleştirildi, 31.01.2024, available [here](#); T.C. Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya'nın Başkanlığında 15. Göç Kurulu Toplantısı Gerçekleştirildi, 29.01.2025, available [here](#)

⁹⁴¹ Council of Europe Programme Office in Ankara, Strengthening the Human Rights Protection in the Context of Migration in Türkiye, available [here](#).

⁹⁴² Council of Europe, Newsroom- Strengthening the human rights protection in the context of migration in Türkiye, 31.12.2024, available [here](#).

⁹⁴³ Information provided by stakeholders, March – April 2024.

⁹⁴⁴ Information provided by a stakeholder, March 2024.

⁹⁴⁵ Information provided by a stakeholder, March - April 2024

⁹⁴⁶ Global Detention Project and International Refugee Rights Association, Türkiye Joint Submission to the UN Committee on the Rights of the Child 93rd Session, 8 – 26 May 2023, 14 April 2023.

⁹⁴⁷ Information from stakeholders, March 2024.

⁹⁴⁸ Karar, Geri gönderme merkezindeki kadınlar kötü muameleye isyan etti, 01.11.2024, available [here](#)

the lack of personnel and the instructions, 12 people are being accommodated in rooms of 8, and sometimes the gym is opened to accommodate detainees. Since more than twice the capacity is accommodated, there is often a shortage of food and difficulty in serving meals. During the summer months, there is a water shortage and access to clothing is a problem. **Iğdır** is a container center with poor physical conditions, that can become extremely hot in the summer and very cold in the winter.⁹⁴⁹

Şanlıurfa: In 2024, both stakeholders and several lawyers interviewed reported that detainees were punished by being placed in cold chambers located in the basement of the facility. Additionally, according to the UTBA report, individuals were forced to sign voluntary repatriation forms through the use of violence.⁹⁵⁰

In 2024, there were reports of ill-treatment in the Gaziantep, Şanlıurfa, and Adana Removal Centers, in particular with the objective of pressuring individuals into signing voluntary repatriation forms.⁹⁵¹

The Çanakkale Medical Chamber, Human Rights Association (IHD), Education and Science Workers' Union (Eğitim-Sen), and Health and Social Service Workers' Union (SES) Çanakkale branches released the "March 2023-March 2024 Migrant Commission Observation Report" on **Ayvacık** Removal Centre.⁹⁵² The report highlights severe human rights violations, including allegations of rape, poor hygiene, and bribery. Detainees reported being subjected to hate speech, inadequate food, and insufficient health services. The report recommends opening RCs to independent inspections, improving living conditions, ensuring adequate nutrition and clean water, providing individual health services with interpreters, and establishing legal measures to address allegations of abuse. Urgent action is called for from relevant ministries and organizations to address these issues. In addition, BVMN present some testimonies of detainees stressing the "circle of lawlessness, arbitrariness and fear", and highlighting the challenges to access medicine and hygiene items.⁹⁵³

In 2024, TİHEK issued a decision regarding a complaint filed by an applicant on behalf of their client, a foreign national of Arab origin. The complaint alleged that the client was subjected to racist conduct and physical abuse by personnel at the Tuzla Removal Center following their transfer to facility on April 25, 2024. The applicant claimed the client was physically assaulted by six officers on April 28, 2024, resulting in a broken finger, after being late for a morning count. The abuse was reported during a lawyer meeting on May 7, 2024, where physical injuries were observed. TİHEK requested security footage, but the institution stated that camera recordings were unavailable due to power outages, although no documentation confirmed such an outage during the alleged incident. A medical report from April 28, 2024, found no signs of physical assault, though it noted limited communication due to a language barrier. Later medical documentation confirmed trauma in the client's hand. On October 16, 2024, TİHEK unanimously concluded that the prohibition of ill-treatment had been violated and decided to file a criminal complaint.⁹⁵⁴

In the Mehmet Hankuş case application (B.N. 2019/24153, K.T. January 12, 2023)⁹⁵⁵, the Constitutional Court unanimously ruled that the prohibition of ill-treatment was procedurally violated due to the lack of an effective investigation into the alleged ill-treatment the applicant claimed to have suffered while held at a removal center. Mehmet Hankuş, the Syrian applicant, was assaulted while held at the **Antalya** Removal Center, did not receive an investigation capable of uncovering all the facts and identifying any responsible parties, thus violating the procedural aspect of the prohibition of ill-treatment guaranteed under Article 17, paragraph 3 of the Constitution. The applicant, subjected to deportation and administrative detention due to ongoing criminal proceedings, claimed to have been assaulted by staff on different occasions. Despite a complaint by the Antalya Bar Association, the subsequent investigation concluded with no prosecution within a few months. Due to technical limitations, security camera footage from the incident could not be

⁹⁴⁹ Information provided by stakeholders, March – April 2024.

⁹⁵⁰ Karar, Avukatlardan Geri Gönderme Merkezi için çarpıcı iddialar: göçmenlere 'Sessiz Oda' ve 'Soğuk Oda' işkencesi, 07.11.2024, available [here](#), TBB ibid, Information provided by a stakeholder, March 2025.

⁹⁵¹ TBB ibid.

⁹⁵² Gazete Duvar, Geri Gönderme Merkezi'nde işkence ve istismar iddiaları: Rapor hazırlandı, April 2024, available [here](#).

⁹⁵³ BVMN, Illegal Pushbacks and Border Violence report, February 2024, available [here](#).

⁹⁵⁴ TİHEK, Kurul Kararı, 2024/996 Başvuru No, 2024/1133 Karar No, 12.11.2024, available [here](#).

⁹⁵⁵ TC Anayasaya Mahkemesi (Başvuru Numarası: 2019/24153), 12 January 2023, available [here](#).

retrieved. An appeal to the Istanbul 2nd Magistrates' Court also yielded no positive outcome. It was noted that the applicant voluntarily left Türkiye on September 20, 2018, while the investigation was ongoing.

Hasan Mohammed, a 28-year-old Syrian, died in **Ankara's** Akyurt Removal Center, where he had been held for a week. Mohammed's family stated that the Removal Center did not make a statement about Mohammed's death, and that there were traces of beatings on his body.⁹⁵⁶ The press release⁹⁵⁷ of PMM on this allegation mentioned that Hasan Mohammad, fell ill on 1 January 2024 and was immediately transferred to the City Hospital after the necessary intervention of the health units in the centre. He was directed to the intensive care unit and died in the hospital while under treatment. An investigation has been initiated by the Directorate of Migration Management. In 2023, the hearing regarding a case of alleged torture against two refugees in 2021 at İzmir Harmandalı RC resulted in no prosecution.⁹⁵⁸

See the [previous updates](#) of the AIDA country report for past observations of detention conditions in different centres in Türkiye.

2.2. Staff, health care and special needs

Detainees shall be provided “urgent and basic health care services which cannot be afforded by the person concerned”.⁹⁵⁹ Access to psychosocial support services is also possible.⁹⁶⁰ Psychosocial support teams try to identify vulnerabilities in the centres and refer individuals for PMM, but capacity issues present challenges⁹⁶¹. When health problems require more than basic care, there may be delays in referring patients to hospitals, such as for patients with cancer. Additionally, it is difficult to provide special diets for detainees with specific health conditions⁹⁶². The staff at the centres received training on first aid, crisis management, secondary trauma, and infectious diseases under an IOM project.⁹⁶³ Due to the frequent turnover of staff, the sustainability and long-term positive effects of such projects are not clear.

Through a joint project of UNHCR and IOM, trainings were organised for the staff aimed at strengthening basic human rights standards, access to legal aid, asylum applications, identification of individuals with special needs, and other mechanisms, rights, and services⁹⁶⁴.

In 2024, a Syrian national who was diagnosed as HIV positive eight months earlier was issued a deportation order and held in a Removal Center, where stakeholders reported that he was denied access to necessary medical treatment.⁹⁶⁵ Several actions were taken concerning the conditions of women in Removal Centers, including a parliamentary research proposal.⁹⁶⁶

See the [previous updates](#) of the AIDA country report for more information on the general conditions about staff, health care and special needs in removal centres.

⁹⁵⁶ Evrensel, “Refugee Mohammed's family suspects torture: GGM finds dead”, 3 January 2024, available in Turkish [here](#).

⁹⁵⁷ PMM, Akyurt geri gönderme merkezinde idari gözetim altında bulunan bir yabancının hayatını kaybetmesiyle ilgili iddialar hakkında basın açıklaması, 4 January 2024, available in Turkish [here](#).

⁹⁵⁸ Yeni yaşam, GGM'de işkenceye takipsizlik, 25 November 2023, available in Turkish [here](#).

⁹⁵⁹ Article 14(1) Removal Centres Regulation.

⁹⁶⁰ Article 14(2) Removal Centres Regulation.

⁹⁶¹ Information provided by stakeholders, March – April 2024.

⁹⁶² Information provided by stakeholders, March – April 2024.

⁹⁶³ Information provided by a stakeholder, March 2024.

⁹⁶⁴ Information provided by a stakeholder, March 2024.

⁹⁶⁵ Gazete Duvar, Ahmed Aabo, Geri Gönderme Merkezi'nde ölüme terk edildi, 16.07.2024, available [here](#).

⁹⁶⁶ Kadın İşçi, Geri gönderme merkezinde kadın olmak, 21.05.2024, available [here](#); Gazete Duvar, Mülteci kadınların sorunlarına ilişkin araştırma önergesi, 17.10.2024, available [here](#).

3. Access to detention facilities

Indicators: Access to Detention Facilities

1. Is access to detention centres allowed to:

- | | | | |
|-------------------|---|---|--|
| ❖ Lawyers: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited | <input type="checkbox"/> No |
| ❖ NGOs: | <input type="checkbox"/> Yes | <input type="checkbox"/> Limited | <input checked="" type="checkbox"/> No |
| ❖ UNHCR: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> Limited | <input type="checkbox"/> No |
| ❖ Family members: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> Limited | <input type="checkbox"/> No |

Under Article 68(8) LFIP, detained applicants for international protection will be provided opportunities to meet with their legal representatives, UNHCR officials and notaries. The law, however, fails to make explicit reference to the right of detained applicants to meet with NGO representatives. It is considered that this deliberate absence is meant to limit or deny detained applicants' access to NGO legal counsellors, which must be seen as an arbitrary reduction of the safeguard in Article 68 LFIP.

Detained applicants may also receive visitors. In this regard, all visits will be subject to permission. Visits to detained applicants at border premises are subject to permission from the Vice-Governor's Office in charge of the border gate. Visits to detained applicants in other facilities are subject to the permission of the PMM official in charge of the facility. Request for visiting a detained applicant may be turned down where the "applicant's condition and the general circumstances are not suitable". This vague formulation raises concerns that arbitrary restrictions may be imposed on visitors' access to the centres. Detention authorities shall determine the duration of the approved meetings and visits. On the other hand, they are required to take measures to ensure confidentiality of the encounters.

3.1. Access of lawyers to Removal Centres

From 2019, lawyers were able to visit their clients in many removal centres without showing power of attorney or written request in many removal centres. Detainees are not able to maintain regular contacts with people outside the centre, the mobile phones are not authorised, and there are limited public phones available. This implementation makes harder for refugees to reach out to lawyers directly, it is common that lawyers become aware of the request through their relatives.⁹⁶⁷ This continued in 2024, when NGOs and social networks of the person in detention informed lawyers of the presence of their clients in removal centres.

Lawyers often struggle to locate their (potential) clients even when they have complete details, including ID numbers and names. Confirming clients' locations, examining their files, and arranging meetings can take days. In 2024, obtaining copies of clients' files or clear information about their locations remained a persistent issue. Centres' officials often impose limits on name inquiries, the number of clients a lawyer can visit, and the duration of meetings. Additionally, clients may be transferred to another centre in a different city, complicating the lawyers' efforts to reach them.⁹⁶⁸

As mentioned in the report of Human Rights and Equality Institution of Türkiye on Tuzla Removal Centre,⁹⁶⁹ in situations where too many lawyers arrive at the Center within the same time frame, it has been stated that, in order to avoid any deprivation of rights, lawyers' meetings are limited to a maximum of three foreign nationals and fifteen minutes. Lawyers who wish to meet with more clients must obtain the administration's approval after all other lawyers have completed their meetings. Similar implementations take in place in various centres.⁹⁷⁰

Attitudes toward lawyers in some centres may be negative:⁹⁷¹ lawyers sometimes spend a day to be able to see a client, due to long waiting period, and remote locations. Various problems⁹⁷² arise due to the

⁹⁶⁷ Information provided by stakeholders, March – April 2024.

⁹⁶⁸ Ibid.

⁹⁶⁹ TIHEK, İSTANBUL TUZLA GERİ GÖNDERME MERKEZİ ZİYARET RAPORU Rapor no: 2023/16, available [here](#)

⁹⁷⁰ Information provided by stakeholders, March-April 2024.

⁹⁷¹ Information provided by stakeholders, March-April 2024.

⁹⁷² Information provided by stakeholders, March-April 2024.

physical conditions of these centres. Issues include a small number of interview rooms (Van, Iğdır), unsuitable room conditions such as poor ventilation (Çankırı), broken (Van) or limited telephones (Pehlivanköy, Edirne) for interpreter connections, malfunctioning doors (Adana), and inadequate insulation (Akyurt). Additionally, meetings are sometimes interrupted by officials who knock or open the door. These interruptions, combined with the limited time available to gather information with the help of an interpreter, negatively impact the quality of the meetings with lawyers. Such behaviour undermines the principle of confidentiality between the lawyer and their client.⁹⁷³ In Tuzla Removal Center, lawyers have to wait outside due to the lack of a waiting room for lawyers. Lawyers within the scope of legal aid can connect to the Legal Aid Translation Support Line using the phone in the lawyers' rooms, and that the translators at the centres also assist in communication between the lawyer and the foreign nationals. However, this line cannot be reached from all Removal Centers, as some still do not provide phone access in the lawyer meeting rooms. This creates a translation barrier, since the centres do not provide interpreters and, even when lawyers bring their own, the authorities require them to be certified translators.⁹⁷⁴

There is often no obstacle for the notary to enter, but the fees and related expenses are significant. Fees vary depending on whether the person has an ID and speaks Turkish or not. A power of attorney document cost starts from 783.82 TRY (approx. 23 EUR). However, if the lawyer is assigned through legal aid, this power of attorney can be presented to the court. Administrative courts provinces may not accept the assignment of legal aid from the bar of another province and demand a separate power of attorney.⁹⁷⁵ In 2024, the number of administrative courts accepting legal aid documents without a power of attorney significantly decreased, causing challenges in meeting the seven-day legal deadline, particularly due to the remote location of Removal Centers, difficulties in coordinating notary visits, and the high travel costs involved⁹⁷⁶.

In 2024, it was reported that a lawyer was not allowed to visit their client at the Malatya Removal Center. When the objection was raised, an official reportedly responded by stating, "I am executing the unlawful action. If you have any objections, you can apply anywhere. I will not let the lawyer do their job."⁹⁷⁷ The removal centres (such as Ankara, Çankırı) located far away from the city centres without any public transportation and the only available transportation is by car or taxi. Also, in Istanbul, removal centres are often very difficult to be reached, as they are 60 km away from the centre. Accessing to the removal centres due to the remote locations and lack of transportation is still problematic in 2024.⁹⁷⁸ In Istanbul, Removal Centers are located so far from the city that, even when legal aid services decide to appoint a lawyer, there have been cases where lawyers declined the assignment due to the applicant being held in Binkılıç Removal Center.⁹⁷⁹

Attorneys in İstanbul used CIMER (Communication Directorate of the Presidency) extensively in cases where there was no access to files, and it was effective. CIMER is an online platform established to provide a quick and effective response to requests, complaints and applications for information from the public.⁹⁸⁰ The administrative complaints mechanism is ineffective, judicial methods are rather slow, but CIMER is a very useful remedy in this regard.

3.2. Access of UNHCR and NGOs to Removal Centres

The Removal Centres Regulation does not expressly regulate the conditions upon which UNHCR, European Delegation in Türkiye and NGOs have access to Removal Centres.

⁹⁷³ Information provided by stakeholders, March-April 2024.

⁹⁷⁴ Information provided by a stakeholder, February 2025.

⁹⁷⁵ Information provided by a stakeholder, March 2021, May 2023 and March-April 2024.

⁹⁷⁶ Information provided by a stakeholder, May 2025.

⁹⁷⁷ TBB Ibid.

⁹⁷⁸ Information provided by a stakeholder, March 2020, May 2023 and March-April 2024. And February, April and May 2025.

⁹⁷⁹ Information provided by a stakeholder, February 2025.

⁹⁸⁰ See, Presidency of the Republic of Türkiye, Directorate of Communications, "CIMER Revolution: In today's Türkiye, our citizens have a share in state administration", 3 December 2019. Available [here](#).

In practice, UNHCR does not enjoy unhindered access to Removal Centres but has developed working modalities with PMM. In 2024, UNHCR is granted access to removal centres; however, these are scheduled meetings with officials to discuss the overall situation, rather than unannounced monitoring visits.⁹⁸¹

TİHEK published reports in 2024 on its visits to seven removal centres, highlighting systemic issues such as overcrowding, inadequate hygiene and healthcare, lack of consistent legal aid access, and insufficient communication of detainees' rights. While some centres showed improvements, particularly where prior visits had been conducted, widespread challenges remained. The institution issued detailed recommendations concerning infrastructure, healthcare, surveillance, access to legal remedies, and the protection of vulnerable groups including children, women, and persons with disabilities.

The visits—mostly unannounced—included: Binkılıç⁹⁸² (9 June 2023, unannounced), where interpreter shortages, limited hygiene provisions, and the absence of soft rooms persisted; Bursa⁹⁸³ (9 May 2023, unannounced), where children were still held with unrelated adults and hygiene conditions remained poor despite earlier recommendations; Akyurt/Ankara⁹⁸⁴ (17 May 2023, announced), which showed notable improvements in legal aid and communication infrastructure following prior visits; Adana⁹⁸⁵ (21–22 February 2024, unannounced), where overcrowding, poor hygiene, and broken equipment were noted; Şanlıurfa⁹⁸⁶ (26–27 February 2024, unannounced), where flood damage remained unrepaired and overcrowding hindered access to services; Edirne⁹⁸⁷ (7–8 May 2024, unannounced), which lacked emergency call systems and adequate privacy in special needs areas; Ağrı (6 June 2024, unannounced), where earlier recommendations had been partially implemented, but systemic rights-based information was still lacking.

As of June 2025, the institution has also published reports on its visits to the Antalya and Kütahya Removal Centers.

The European Delegation in Türkiye also has access to removal centres as the EU has provided financial support to the construction of new removal centres to monitor who the EU funds were used and to evaluate the projects on the spot check. By the end of 2023, the European Delegation had conducted three visits to removal centres in **Ankara** and **Şanlıurfa**.⁹⁸⁸

UNHCR has access to removal centres, with prior notification and upon PMM's approval.⁹⁸⁹ NGOs have not established protocols with PMM for access to Removal Centres. Regarding access to and contact with family members, practice varies across the centres.

In 2024, the Council of Europe published a practical guide titled “Monitoring Places of Immigration Detention”, aimed at supporting independent monitoring activities in removal centres.⁹⁹⁰

D. Procedural safeguards

1. Judicial review of the detention order

Indicators: Judicial Review of Detention

1. Is there an automatic review of the lawfulness of detention?
- | | | |
|-------------------------|---|--|
| ❖ Asylum detention | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Pre-removal detention | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

⁹⁸¹ Information provided by multiple stakeholders, February, March and April 2025.

⁹⁸² TİHEK, İstanbul Binkılıç Geri Gönderme Merkezi Ziyareti Raporu, Rapor No: 2024/48, available [here](#).

⁹⁸³ TİHEK, Bursa Geri Gönderme Merkezi Ziyareti Raporu, Rapor No: 2024/34, available [here](#).

⁹⁸⁴ TİHEK, Ankara Akyurt Geri Gönderme Merkezi Ziyareti Raporu, Rapor No: 2024/33, available [here](#).

⁹⁸⁵ TİHEK, Adana Geri Gönderme Merkezi Ziyareti Raporu, Rapor No: 2024/63, available [here](#).

⁹⁸⁶ TİHEK, Şanlıurfa Geri Gönderme Merkezi Ziyareti Raporu, Rapor No: 2024/68, available [here](#).

⁹⁸⁷ TİHEK, Edirne Geri Gönderme Merkezi Ziyareti Raporu, Rapor No: 2024/79, available [here](#).

⁹⁸⁸ Information provided by a stakeholder, March 2024.

⁹⁸⁹ Information provided by a stakeholder, March 2024.

⁹⁹⁰ Avrupa Konseyi, GÖÇMENLERİN İDARİ GÖZETİM YERLERİNİ İZLEME REHBERİ, August 2024, available [here](#).

2. If yes, at what interval is the detention order reviewed?

1 month

The decision to detain an international protection applicant during the processing of their claim must be communicated in writing.⁹⁹¹ The notification letter must provide the reasons justifying detention and the length of detention. The applicant must also be notified of the legal consequences of the detention decision and available appeal procedure. However, the LFIP does not impose a requirement to provide this information in writing.

In practice, due to limited familiarity with the rights of lawyers on the part of Removal Centres' staff, applicants and their legal representatives rarely receive a copy of the removal decision and/or the detention order so as to know when the time limit for appeal starts running,⁹⁹² or receive documents without official signatures and seals.

While there is no requirement of automatic periodic review of the detention decision by either the judiciary or PMM itself in relation to detention in the international protection procedure,⁹⁹³ pre-removal detention must be reviewed by the governorate on a monthly basis.⁹⁹⁴

The decision to detain can be challenged at the competent Magistrates' Court through a non-suspensive appeal.⁹⁹⁵ The law does not set out a time limit for appealing detention. The competent Magistrates' Court judge must decide on the judicial review application within 5 days. The decision of the Magistrates' Court is final and cannot be appealed. However, there are no limitations on new appeals by the applicant to challenge their ongoing detention.⁹⁹⁶

According to lawyers' observations, the poor quality of detention review by Magistrates' Courts persists as a problem. In the **Istanbul, Aydın, Hatay, Gaziantep, Adana, Kayseri** and **Erzurum** Removal Centres,⁹⁹⁷ appeals against detention are rejected as a general rule.⁹⁹⁸ In **İzmir, Van, and Edirne** there are increasing concerns about a 'systemic practice' in courts to reject administrative detention reviews, as the rejection rates increased in 2023 and as of March 2024.⁹⁹⁹ However, Izmir Magistrates' Court had still some positive decisions to lift the administrative detention decisions in 2023.

In 2024, the general concern among lawyers was that it had become nearly impossible to obtain a positive decision from Magistrates' Courts. Some of them are impossible like İğdır. Some lawyers expressed the view that this remedy was no longer effective. Stakeholders reported that certain judges appeared frustrated when they received repeated applications regarding the same detention, despite the legal right to submit multiple applications based on changed circumstances.¹⁰⁰⁰ Although there were a few exceptional positive decisions, these were rare. One stakeholder mentioned a case where the individual was released in the seventh month of detention following the eighth application to the court. In another case, the lawyer secured their client's release after ten months. There were several more positive examples after ten or eleven months of detention. Nevertheless, stakeholders emphasized that given the legal maximum duration of

⁹⁹¹ Article 68(4) LFIP.

⁹⁹² Information provided by stakeholders, May 2022 and March 2024.

⁹⁹³ Article 68(6) LFIP only states that detention may be lifted at any point.

⁹⁹⁴ Article 57(4) LFIP.

⁹⁹⁵ Article 68(7) LFIP; Article 96(6) RFIP. In November 2015, the High Council of Judges and Prosecutors passed a decision to designate the 2nd Chamber of each Magistrates' Court responsible for appeals against administrative detention decisions within the scope of LFIP.

⁹⁹⁶ Article 68(7) LFIP; Article 96(6) RFIP.

⁹⁹⁷ Information provided by a lawyer of a Bar Association, February 2018; a lawyer of a Bar Association, February 2018; International Refugee Rights Association, February 2018; a lawyer of a Bar Association, February 2019; a lawyer of a Bar Association, February 2019; information provided by various stakeholders, May-June 2023.

⁹⁹⁸ See e.g. 2nd Magistrates' Court of Gaziantep, Decision 2018/7568, 13 December 2018; Decision 2018/1773, 6 March 2018; Decision 2018/1776, 6 March 2018; 2nd Magistrates' Court of Van, Decision 2018/6023, 27 November 2018; Decision 2018/6166, 7 January 2018; 2nd Magistrates' Court of Antakya, Decision 2018/ 4287, 27 November 2018: information provided by various stakeholders, May-June 2023 & information provided by various stakeholders, March - April 2024.

⁹⁹⁹ Information provided by stakeholder, March - April 2024.

¹⁰⁰⁰ Information provided by a stakeholder, Februar 2025.

detention is 6+6 months, obtaining a release order only after 8 to 11 months does not make this legal procedure an effective remedy.¹⁰⁰¹

One crucial gap in the LFIP provisions on detention concerns remedies against detention conditions.¹⁰⁰²

Finally, where administrative detention is unlawful, the applicant can lodge a compensation claim (*Tam Yargı Davası*) before the Administrative Court.¹⁰⁰³ Nevertheless, based on administrative court decisions regarding compensation claims, the viability of this option remained highly questionable.¹⁰⁰⁴ It must be noted that, despite eight years having passed since the *B.T.* decision, there remains significant uncertainty regarding the competent court for filing compensation claims related to unlawful detention. According to stakeholders, this legal ambiguity encourages arbitrary actions by the authorities, as the prevailing mind-set appears to normalize detaining a foreign national without a legal basis more readily than doing so to a citizen.¹⁰⁰⁵

As of June 2025, the administrative courts of Istanbul 1st, 15th, 16th, 17th, and 18th Chambers have jurisdiction over cases arising under the Law on Foreigners and International Protection (LFIP). The increasing number of competent chambers has made it challenging to maintain consistency in judicial standards. This variation in practice affects even previously established positive developments—such as adherence to legal time limits or the application of the safe third country concept—by introducing diverging or inconsistent interpretations across chambers.¹⁰⁰⁶

2. Legal assistance for review of detention

Indicators: Legal Assistance for Review of Detention

1. Does the law provide for access to free legal assistance for the review of detention?
 Yes No
2. Do asylum seekers have effective access to free legal assistance in practice?
 Yes No

Detained international protection applicants must be given opportunity to meet with legal representatives, notary and UNHCR officials, if they wish so.¹⁰⁰⁷ Persons who do not have the financial means to pay a lawyer are to be referred to the state-funded Legal Aid Scheme in connection with “judicial appeals” pertaining to any acts and decisions within the international protection procedure.¹⁰⁰⁸

However, the functioning of the Legal Aid Scheme in Türkiye requires the applicant to approach the bar association to make a formal request for legal aid. It remains very difficult for a detained asylum seeker to access the legal aid mechanism by him or herself, especially since the authorities do not provide information on the right to legal assistance in a language understood by the individual.¹⁰⁰⁹ In most cases, either an NGO or UNHCR will alert the bar association and seek to ensure the appointment of a legal aid lawyer to the person. It is observed from the field that no NGO has direct access to Removal Centres for the purpose

¹⁰⁰¹ Information provided by multiple stakeholders, May 2025.

¹⁰⁰² For a discussion, see Refugee Rights Türkiye, *A pressing need: The lack of legal remedy in challenging material conditions of foreigners under administrative detention in Türkiye*, January 2017, available [here](#)

¹⁰⁰³ Constitutional Court, *B.T.*, Decision 2014/15769, 30 November 2017.

¹⁰⁰⁴ Information provided by various stakeholders, June 2023. For further analysis, see; Gamze Ovacık, *Turkish Judicial Practices on International Protection, Removal and Administrative Detention in Connection with the Safe Third Country Concept* (On İki Levha Publications 2021) 221-250.

¹⁰⁰⁵ Information provided by multiple stakeholders March and April 2025.

¹⁰⁰⁶ Information provided by a stakeholder May 2025.

¹⁰⁰⁷ Article 68(8) LFIP.

¹⁰⁰⁸ Article 81(2) LFIP.

¹⁰⁰⁹ Information provided by a lawyer of a Bar Association, February 2018; a lawyer of a Bar Association, February 2018; a lawyer of a Bar Association, February 2018, stakeholders, March – April 2024.

of providing legal assistance.¹⁰¹⁰ This is even impossible in practice if the applicant is classified as a foreign terrorist fighter.¹⁰¹¹

In practice,¹⁰¹² detainees' access to legal representation and effective legal assistance and support are obstructed in various ways, which negatively affects their ability to appeal within the legal timeframe. Lawyers visiting the centres are often misled, being told that the detainee is not present, has been transferred to another centre, or that their case file is unavailable. Detainees typically do not have access to their personal phones and often cannot remember the contact numbers of their lawyers or family members. They were occasionally allowed to phone from the removal centers' landline. However, those hours vary and are sometimes outside of work hours, making it challenging for them to get in touch with organizations like the UNHCR's counselling line, the bar Associations, or NGOs. Although some removal centres provide informative leaflets with contact details for legal assistance, direct communication with Bar associations' legal aid services is often impossible due to language barriers.

The requirement of a notarised power of attorney poses an additional constraint (see [Regular Procedure: Legal Assistance](#)). Since detained asylum seekers are not issued an identification card before they have had the possibility to register with the PDMM, it is impossible for them to notarise a power of attorney.¹⁰¹³ Furthermore, issuing a power of attorney and interpretation entail financial costs, which vary depending on the distance of the Removal Centre and the language of the individual.¹⁰¹⁴

In 2018 the Administrative Court of Ankara held that access to legal counselling is a basic human right and should be granted to refugees without the requirement of a power of attorney.¹⁰¹⁵ Moreover, when a lawyer is appointed by a bar association to represent a person under the Legal Aid Scheme, the official appointment letter can serve as a temporary substitute in place of a notarised power of attorney. In practice, the courts accept representation of detained applicants under a legal aid appointment document without a power of attorney.¹⁰¹⁶ Unfortunately, by 2021, the judges changed and in Ankara power of attorney was again required to represent clients in appeals against deportation decisions. The court charged lawyers who could not present a power of attorney within the seven days and rejected the cases in the final decision.¹⁰¹⁷ The same implementation started in Izmir and Istanbul in 2023, the lawyers who do not have a power of attorney, procedural rejection is given, and all expenses are borne by the lawyer.¹⁰¹⁸ It is also observed by lawyers in Izmir that some notaries impose unofficial number restrictions or slow down power of attorney transactions.¹⁰¹⁹

In **Van**, officials in the administrative detention center are in charge of 'deciding' whether a person needs legal assistance or not. In 2024, while lawyers are appointed within the scope of UTBA in Van province, there are difficulties in appointments in Ağrı and Iğdır provinces.¹⁰²⁰ For example, one stakeholder reported that a client was threatened after they sought legal assistance. Asylum-seekers seeking a lawyer's help get discouraged and intimidated by officials. The period they spend in administrative detention is extended due to systematic pressure. Some clients refrain withdraw from legal assistance for this reason.¹⁰²¹

¹⁰¹⁰ Information provided by a stakeholder, March 2024.

¹⁰¹¹ Information provided by a lawyer of a Bar Association, January 2018; a lawyer of a Bar Association, February 2018; a lawyer of a Bar Association, March 2018.

¹⁰¹² Information provided by stakeholders, March – April 2024, Global Detention Project, Türkiye: Submission to the Committee against Torture, June 2024.

¹⁰¹³ Izmir Bar Association, *Izmir Geri Gönderme Merkezlerinde Adalete Erişim Hakkı Çerçevesinde Yaşanan Sorunlar Raporu*, July 2017, 18-19. See also Refugee Rights Türkiye, *Barriers to the right to an effective legal remedy: The problem faced by refugees in Türkiye in granting power of attorney*, February 2016, available [here](#)

¹⁰¹⁴ Information provided by stakeholders, March – April 2024

¹⁰¹⁵ Evrensel, 'Yargı: Mülteciler vekaletnamesiz avukat hizmeti alabilir', 20 January 2018, available in Turkish [here](#).

¹⁰¹⁶ Information provided by a lawyer from a Bar Association, February 2019. See also District Court of Ankara, 10th Chamber, Decision 2017/1267, 20 December 2017.

¹⁰¹⁷ Information provided by a stakeholder, May 2022.

¹⁰¹⁸ Information provided by stakeholders, March – April 2024.

¹⁰¹⁹ Information provided by stakeholders, April 2024.

¹⁰²⁰ Information provided by stakeholders, March 2024.

¹⁰²¹ Information provided by a stakeholder, May 2023.

In 2023, the suspension of the UTBA project for a period, often between October and March, directly affected lawyers working on refugee rights in the cities where UTBA project supports legal aid. This suspension had less effect on the activity of the **Izmir** Bar Association, as legal aid continued to appoint lawyers throughout this period.¹⁰²² Within the scope of the cooperation between UNHCR and TBB, legal aid requests of bar associations are sent through the online system, requests are evaluated by the joint commission. There is no detailed data regarding the legal aid requests from the removal centres. In 2024, a total of 4,593 appointments submitted for coverage under UNHCR-UTBA partnership.¹⁰²³ As previously noted, in 2024, the majority of bar associations refrained from appointing legal aid lawyers in the absence of ongoing funded projects. As a result, fewer applicants sought legal assistance. Furthermore, due to the low likelihood of a favourable ruling from Magistrates' Courts in cases challenging administrative detention, applicants increasingly resorted to irregular means to secure their release. According to stakeholders, isolated instances of bribery within removal centres were reported during the year.

Ongoing visits by the Afghan Consulate to removal centres, particularly in Istanbul, have emerged as a notable issue in early 2025. According to stakeholders, consular officials have been conducting interviews with Afghan nationals subject to administrative detention and deportation orders. During these interviews, officials reportedly advise individuals against consulting with a lawyer, claiming that doing so may prolong legal proceedings. Due to persistent issues with accessing legal aid, applicants and their families often cooperate with consulate officials and demonstrate reluctance to engage with legal counsel. As of June 2025, no tangible outcomes have been observed as a result of these consular interventions.

UNHCR continued to run several workshops with removal centres, PMM, and bar associations¹⁰²⁴ on issues such as lawyers' problems, access to removal centres, and refugees' access to legal aid. UNHCR and IOM supports removal centres with information provision for asylum seekers when they first come to removal centres.¹⁰²⁵

E. Differential treatment of specific groups in detention

No policy regarding the differential treatment of detainees based on nationality was reported in 2024. In 2024, Binkılıç is mostly used by Afghans. Whereas Tuzla is mostly for Middle Eastern and North African nations such as Tajikistan, Morocco, Uzbekistan, and Turkmenistan. Çatalca is for women. In the past, stakeholders reported that some Removal Centres detained specific population groups. Izmir (Harmandal), Kayseri, and Hatay, for instance, detained mixed populations, including irregular migrants and foreign fighters, while Gaziantep primarily detained Syrians categorised as YTS (Foreign Terrorist Fighters).

¹⁰²² Information provided by stakeholders, March – April 2024.

¹⁰²³ UNHCR, Legal Assistance Factsheet – UNHCR Türkiye January 2025 available [here](#).

¹⁰²⁴ İstanbul Barosu, Uluslararası Koruma ve Mülteci Hukuku Eğitimi, 29.01.2025, available [here](#).

¹⁰²⁵ UNHCR, 'Türkiye Mayıs-Temmuz 2022', 2022, available in Turkish [here](#). & Information provided by a stakeholder, March 2024.

Content of International Protection

The LFIP provides three types of international protection status in accordance with Türkiye’s “geographical limitation” policy on the 1951 Refugee Convention.

1. Persons who fall within the refugee definition in Article of the 1951 Convention and come from a “European country of origin”¹⁰²⁶ qualify for **refugee status** under LFIP, in full acknowledgment of Türkiye’s obligations under the 1951 Convention. The Turkish legal status of refugee under LFIP should afford rights and entitlements in accordance with the requirements of the 1951 Convention, including the prospect of long-term legal integration in Türkiye. The numbers of persons who qualified for refugee status have never been transparent but in an event organised in October 2021, PMM informed that there were 28 refugees in Türkiye.¹⁰²⁷ In 2024, no information was shared.
2. Persons who fall within the refugee definition in Article of the 1951 Convention but come from a so-called ‘non-European country of origin’, are instead offered **conditional refugee status** under LFIP. Conditional refugee status is a Turkish legal concept introduced by the LFIP for the purpose of differentiating in treatment between 1951 Convention-type refugees originating from ‘non-European’ states and those originating from ‘European’ states. The status of conditional refugee affords to beneficiaries a set of rights and entitlements lesser to that granted to refugee status holders and to subsidiary protection holders in some respects. Most importantly, conditional refugees are not offered the prospect of long-term legal integration in Türkiye and are excluded from Family Reunification rights. The number of people granted conditional refugee status has never been made public. There is no data shared in 2024, the latest number was roughly 2,000 conditional refugees in October 2021.¹⁰²⁸
3. Persons who do not fulfil the eligibility criteria for either refugee status or conditional refugee status but would however be subjected to death penalty or torture in country of origin if returned, or would be at “individualised risk of indiscriminate violence” due to situations or war or internal armed conflict, qualify for **subsidiary protection** status under LFIP. The Turkish legal status of subsidiary protection mirrors the subsidiary protection definition provided by the EU Qualification Directive. Similar to the conditional refugee status holders, subsidiary protection beneficiaries receive a lesser set of rights and entitlements as compared to refugee status holders and are barred from long-term legal integration in Türkiye. Notably however, unlike conditional refugees, subsidiary protection beneficiaries are granted family reunification rights in Türkiye.

Stakeholders emphasized that in practice, non-Syrian applicants arriving from outside Europe are most often granted *conditional refugee* status, regardless of the nature of their claim. Even in cases where the applicant’s circumstances clearly align with the criteria for *subsidiary protection*—particularly claims involving indiscriminate violence—authorities have been observed to issue decisions granting conditional refugee status instead.

While the specific reasoning behind this practice is not officially stated, stakeholders suggested that it may be linked to the final sentence of Article 62 of the Law on Foreigners and International Protection (LFIP), which states that “the individual shall be allowed to remain in Türkiye until resettled to a third country.” This provision is interpreted by authorities as applying to individuals intending to seek resettlement in Europe. Another possible reason is the difference in access to the labor market: while holders of subsidiary protection are exempt from applying for a work permit, conditional refugees are still required to obtain one.

As of mid-2024, Türkiye hosted a total of 194,637 refugees and asylum seekers of various nationalities, primarily from Afghanistan, Iraq, and Iran. This includes 12,549 registered refugees from Afghanistan and 12,909 from Iraq. Additionally, there were 91,373 asylum seekers from Afghanistan, 89,397 from Iraq, and

¹⁰²⁶ For the purpose of “geographical limitation” in regards to the interpretation of the 1951 Convention, Government of Türkiye considers countries members of the Council of Europe as ‘European countries of origin’.

¹⁰²⁷ QHA, ‘Göç ve uyum konulu toplantıda Türkiye’deki göç olgusu anlatıldı’, 17 March 2021, available in Turkish [here](#)

¹⁰²⁸ *ibid.*

9,280 from Iran.¹⁰²⁹ In 2024, Türkiye recorded 38,725 displaced Ukrainians, including 2,620 who applied for international protection.¹⁰³⁰

Specifically, the Afghan community in Türkiye, often labelled by the media and political actors as "undocumented," "illegal," and a "security risk," faces the strictest security measures. Consequently, they adopt strategies to become invisible and introverted in urban areas, making minimal or no claims to rights or services.¹⁰³¹ Furthermore, the lack of consensus on the number of foreigners in Türkiye highlighted the need for greater transparency and public dialogue on immigration issues.¹⁰³²

The earthquakes in Türkiye and Syria in February 2023, occurring at a time of limited resources and government capacity, further exacerbated anti-migrant sentiments.¹⁰³³ The effects of the earthquakes are discussed under the [Content of Temporary Protection](#), as the main refugee group in the region is Syrians under temporary protection.

Additionally, policies aimed at rendering migrant and refugee groups invisible in Türkiye have resulted in instances of discrimination and hate speech. The attack in Izmir Konak, where one refugee was killed and another severely injured, has highlighted the scapegoating of refugees as responsible for poverty and unemployment in Türkiye, exposing them to hate speech and racist attacks.¹⁰³⁴ According to a survey, 43.6% of respondents consider irregular migration as the biggest threat to Türkiye,¹⁰³⁵ indicating the prevalence of anti-immigrant sentiments and the need for addressing such issues. Refugees rank third with a percentage of 4.4% in 2024, behind the economy (60.2%) and injustice (9%).¹⁰³⁶ (For further details, see [Reception Conditions](#))

EU funding is almost exclusively allocated to Syrians (see [Content of Temporary Protection](#)), neglecting other groups. For instance,¹⁰³⁷ often NGOs and civil society actors, who wish to support non-Syrians, especially Afghans must rely on their own resources, leaving those aiding Afghans unsupported and underfunded by state and international bodies. Other issues regarding the funding¹⁰³⁸ are (1) overall budget cuts of different funding instruments, especially for the projects supporting inclusion, (2) overlooking some priorities identified by stakeholders, (3) requirements to access the EU funding through INGOs, (4) lack of targeted funding to municipalities which provide services to refugees regardless of the status or nationality, and (5) difficulties to ensure the sustainability of the projects.

A. Status and residence

2. Residence permit

Indicators: Residence Permit

1. What is the duration of residence permits granted to beneficiaries of protection?
 - ❖ Refugee status 3 years
 - ❖ Conditional refugee status 1 year
 - ❖ Subsidiary protection 1 year

According to the LFIP, foreign nationals who seek legal stay in Türkiye are required to obtain a residence

¹⁰²⁹ UNHCR Türkiye Factsheet September 2024, available [here](#)

¹⁰³⁰ UNHCR, Ukraine Refugee Situation, available [here](#)

¹⁰³¹ GAR, October 2023, Actors and Mechanisms of (Non-)reception of the Afghans in Turkey GAR Report No. 9

¹⁰³² Information provided by stakeholders, March – April 2024.

¹⁰³³ Sert, D., Daniş, D., & Sevinin, E. (2023). *Göç ve Deprem Durum Tespit Raporu*. İstanbul: Göç Araştırmaları Derneği, GAR.

¹⁰³⁴ Ege Evrensel, 16.08.2023, İHD İzmir Şubesi, Konak'taki ırkçı saldırıya ve mülteci düşmanlığına tepki gösterdi available [here](#)

¹⁰³⁵ Kısadalga, 07.08.2023, Metropoll'den 'en büyük tehdit' araştırması: Düzensiz göç mü dış güçler mi?, available [here](#)

¹⁰³⁶ Kısadalga, Anket: 'Türkiye'nin en önemli sorunu nedir' sorusunda ilk 10, 12.10.2024, available [here](#)

¹⁰³⁷ GAR Report No. 9, Actors and Mechanisms of (Non-)Reception of the Afghans in Turkey, October 2023, available [here](#)

¹⁰³⁸ Information provided by stakeholders, March – April 2024

permit. There are 6 types of residence permits available to foreign nationals.¹⁰³⁹ Neither the International Protection Status Holder Identification Document issued to international protection status holders nor the Temporary Protection Identification Document issued to beneficiaries of [Temporary Protection](#) are identified as “residence permits” as such in Turkish law. The LFIP does not envision the granting of residence permits to either international protection status holders or beneficiaries of temporary protection.

The law instead identifies these categories of foreign nationals to be “exempt from the residence permit requirement” that applies to other categories of foreign nationals.¹⁰⁴⁰ They are instead envisioned to stay in Türkiye on the basis of open-ended international protection status documents respectively. The International Protection Status Holder Identification Document “shall substitute a residence permit” within the meaning of being equivalent to residence permit for the person concerned in the sense of authorising legal stay in Türkiye.¹⁰⁴¹

Prior to 24 December 2019, **refugees** were granted an International Protection Status Holder Identification Document with a validity period of 3 years,¹⁰⁴² **conditional refugees** and beneficiaries of **subsidiary protection** were issued a document valid for 1 year.¹⁰⁴³ Currently instead, for those who are granted conditional refugee, subsidiary protection and international protection status, an identity document including foreign identity number is issued.¹⁰⁴⁴ The duration of validity of these documents, along with the rules on format and content, is to be determined by the Ministry of Interior.

Therefore, in summary, it should be concluded that the law stops short of offering clear legislative guidance as to the duration of legal stay envisioned for international protection status holders regardless of what types of international protection the person concerned was granted. International Protection Status Holder Identification Document granted to status holders are to “remain valid until terminated by PMM”. That is, the discretion to terminate an International Protection Status Holder Identification Document and thereby the actual duration of legal stay afforded by an international protection status are left to the discretion of PMM.

By default, in light of the *non-refoulement* obligation guaranteed by Article 4 LFIP and in the absence of [Cessation](#) or [Withdrawal](#) procedures, it is unclear whether there can be any other circumstances under which the International Protection Status Holder Identification Document issued to an international protection status holder may be justifiably terminated.

On the other hand, from the vantage point of an international protection beneficiary, since the International Protection Status Holder Identification Document cannot lead to [Long-Term Residence](#) in Türkiye and since time spent in Türkiye on the basis of an International Protection Status Holder Identification Document cannot count towards the fulfilment of the 5-year uninterrupted legal residence requirement for [Naturalisation](#), the legislative framework in Türkiye fails to offer international protection status holders any prospect of long term legal integration in Türkiye.

This approach adopted in LFIP and reinforced by the RFIP should be interpreted as an extension of Government of Türkiye’s ongoing “geographical limitation” policy in relation to its obligations under 1951 Refugee Convention.

2. Civil registration

Address verification started at the end of 2021, beginning of 2022 for temporary protection holders then for international protection holders. The number of temporary protection holders whose records have been updated is 1,877,269 in 2024 and 986,852 in 2023.¹⁰⁴⁵ In general, PDMM notifies those who do not live in

¹⁰³⁹ Article 30(1) LFIP.

¹⁰⁴⁰ Article 20(1)(g) LFIP, citing Article 83; Article 93(2) RFIP.

¹⁰⁴¹ Article 83(3) LFIP.

¹⁰⁴² Article 83(1) LFIP.

¹⁰⁴³ Article 83(2) LFIP.

¹⁰⁴⁴ Article 83 as amended by 85 7196 Law, 24 December 2019.

¹⁰⁴⁵ PMM, Faaliyet Raporu 2023, available [here](#)

their declared addresses that first their GHI will be deactivated then their IDS will be cancelled.¹⁰⁴⁶ UNHCR provides support to PMM in the update processes of both the registrations of Syrians born in Türkiye and general registrations, as well as address and family component changes.¹⁰⁴⁷

2.1. Civil registration of child-birth

Birth registration is both a right and an obligation for foreigners including beneficiaries of international protection. Births that take place in Türkiye need to be notified to the Population and Civil Registry Departments under the Governorates. The mother, father or legal guardian of the child shall be responsible for the notification. In the absence of parents or a legal guardian, the child's grandmother, grandfather, adult siblings or other persons accompanying the child shall notify the Population and Civil Registry Departments.

The notification needs to be made to the Population and Civil Registry Departments within 30 days. After birth registration, a birth certificate called International New Born Certificate (*Uluslararası Dogum Kayıt Ornegi*) will be issued for the child. The registration process and the issuance of the certificate are free of charge.

Reporting the birth of the child to the PDMM is important as the child will be issued with an identity document called certifying their legal status in Türkiye. Registration enables children to access rights such as education and health care. Birth registration proves the age of the child and protects the child from being vulnerable to protection risks such as trafficking, child labour, child marriage, illegal adoption, and sexual exploitation. Birth registration also proves the parental linkage between the child and the parents and protects the unity of the family. It can also help family reunification of the child with the parents in the future in case of family separation.

2.2. Civil registration of marriage

Turkish law is applied for all marriage procedures for international protection beneficiaries and applicants. Under Turkish law, a Turkish national and an applicant or beneficiary or two applicants or beneficiaries of different nationalities can be married by the Turkish authorities. All marriages carried out by the Turkish authorities are subject to the Turkish Civil Code and related regulations.

Marriages are conducted by marriage officers at the Marriage Departments of municipalities. Couples intending to marry therefore need to submit the relevant documents to municipalities. Relevant documents are:

- Petition of the marriage: the couple must file a petition of marriage (*evlenme beyannamesi*), signed by both individuals applying to marry;
- Celibacy document certifying that the applicants are not already married;
- Medical report confirming that the applicants are free from diseases that would prevent them from getting married;
- International protection applicant registration document; international protection applicant identity document or international protection status holder identity document;
- Four photographs.

Non-official marriages are not recognised in Türkiye. A religious marriage (carried out by imams) is only permitted after the official marriage.

Discriminatory practices targeting foreign citizens were reported since 2022. This included marriage registration. As part of his vigorous anti-migrant campaign, the Mayor of Bolu increased the cost of the marriage procedure – that reached 100,000 TL (5,000 EUR) - for third country nationals.¹⁰⁴⁸ The Türkiye Human Rights and Equality Body imposed a fine of 40,000 TL (2,000 EUR) on the Mayor of Bolu for the

¹⁰⁴⁶ Information provided by a stakeholder, May 2023.

¹⁰⁴⁷ Information provided by a stakeholder, March 2024.

¹⁰⁴⁸ Hurriyet Daily News, 'Bolu mayor announces 'controversial' wedding fee tariffs', 13 November 2021, available [here](#)

discriminatory practice.¹⁰⁴⁹ Recently, similar decision was taken by the Mayor of Afyonkarahisar Belediyesi, who increased the cost of marriage procedure to 10,000 TL, which is normally 400 TL.¹⁰⁵⁰

There can be delays in divorce cases. If the residential address of a missing spouse cannot be determined, the litigation period can take a long time.¹⁰⁵¹ In the divorce cases of Afghan protection seekers, courts request a document from the country of origin proving that the applicant was married in Afghanistan but due to the regime change, these documents cannot be obtained from the embassies, and lawsuits are frozen.¹⁰⁵²

Regional PDMMs has processed data updates (civil status matters such as changing marital status, registration of a new-born etc.) over an electronic appointment system called E-Randevu. People can get an appointment by ringing 157 or on the website goc.net.org. An appointment system is in place in big cities such as **Gaziantep**, **Şanlıurfa**, and **Hatay** where there are large refugee populations. In small cities people can apply without an appointment. Appointment schedules depend on the province and may sometimes be very busy. There were reports of refugees giving bribes to get an appointment in **Adana** and **Gaziantep**, as the waiting period for an appointment could reached up to 2-3 months, except in urgent cases.¹⁰⁵³

In 2023, the Turkish Court of Cassation upheld the annulment of a second marriage, conducted in Syria by a Syrian national who later acquired Turkish citizenship, on the grounds of absolute nullity due to violation of public order¹⁰⁵⁴. The individual had legally married a second wife in Syria while still married to the first, and upon gaining Turkish citizenship, both marriages were registered in Türkiye. The decision, based on Turkish Civil Code Article 145/1, was initially challenged but ultimately confirmed by the Court of Cassation, emphasizing that polygamy is prohibited under Turkish law regardless of the individual's previous nationality and legal practices in their country of origin.

3. Long-term residence

The EU Long-Term Residence Directive does not apply to Türkiye. However, as regards long-term resident status under Turkish law, Article 42(2) LFIP governing “long-term residence permits” in Türkiye specifically provides that international protection beneficiaries are not eligible for transition to a long-term residence permit.

4. Naturalisation

Indicators: Naturalisation	
1. What is the waiting period for obtaining citizenship?	5 years
2. Number of citizenship grants to beneficiaries in 2024	Not available

According to Law No 5901 on Turkish Citizenship, there are three procedures for naturalisation of foreign citizens. Citizenship may be acquired through:

- a. **Normal procedure:** According to the normal procedure, the foreigner must have a valid residence permit in Türkiye for 5 years. The foreigner with a valid residence permit must not leave Türkiye more than 180 days during the 5-year residence period. If this period is exceeded, the 5-year period is restarted.

After the completion of 5 years, it is not possible to directly acquire citizenship. First, the Citizenship Committee assesses the economic status and social cohesion of the applicant. Afterwards, security checks are conducted by the local police and the National Intelligence Organisation and the collected information is sent to the General Directorate of Citizenship of the Ministry of Interior. If no issues are raised at the end of the security investigation, the applicant

¹⁰⁴⁹ Sendika, ‘Tanju Özcan’ın mültecilere yaptığı ayrımcılıktan dolayı Bolu Belediyesi’ne para cezası’, 19 May 2022, available in Turkish [here](#)

¹⁰⁵⁰ T.C.Afyonkarahisar Belediyesi, X account, 2 May 2024.

¹⁰⁵¹ Information provided by a stakeholder, April 2022.

¹⁰⁵² Information provided by a stakeholder, April 2022.

¹⁰⁵³ Information provided by a stakeholder, May 2023.

¹⁰⁵⁴ RRT, Sığınma hukuk bülteni

acquires the Turkish citizenship under a proposal of the General Directorate of Citizenship of the Ministry of Interior through the approval of the Minister of Interior.

- b. **Marriage to a Turkish citizen:** If the marriage of the applicant lasts 3 years and is effective, the applicant can acquire the citizenship. However, the applicant again needs to be 'cleared' by a security investigation.
- c. **Exceptional circumstances:** Citizenship based on exceptional circumstances is mostly granted to foreigners who bring industrial skills or contributing to the scientific, economic, cultural, social and sportive progress of Türkiye, without any residence or temporal conditions. In this way, it is aimed at granting qualified people Turkish citizenship as quickly as possible. As of May 2022, several terms in the regulation on the implementation of Law on Turkish Citizenship Procedures underwent some changes; currently, the Turkish citizenship can be acquired in 8-9 months in exchange for: purchasing designated for construction, on which a condominium ownership or condominium servitude has been established, of at least 400,000 USD from designated districts; investing in fixed capital of at least 500,000 USD; creating new employment for at least 50 people; depositing in Türkiye at least 500,000 USD with a reservation of not withdrawing it for three years; buying governmental bonds of 500,000 USD with a reservation of not selling them for three years; acquiring investment funds of 500,000 USD.¹⁰⁵⁵ With the amendment in May 2022, foreigners investing in private pension schemes at least 500,000 USD with a reservation of not withdrawing it for three years shall also acquire Turkish citizenship.¹⁰⁵⁶ Application for Turkish citizenship by investment is completed in approximately 3 months. The public has widely criticised the new modifications, which dramatically reduce the amount of financial contributions from millions of dollars to 500,000 USD, claiming that the government offers 'citizenship for free.' Prior to the modifications, Türkiye ranked third in the world for the lowest cost of citizenship.¹⁰⁵⁷

According to latest data from 2021 collected from the Ministry of Environment and Urbanization 19,630 foreigners have received Turkish nationality through purchasing property since 2017.¹⁰⁵⁸ From 2015 to 2022, Iraqi nationals rank first with 43,351 properties and 29,992 Iranians in second place with. Other foreigners buying properties to acquire citizenship are from Russia, Saudi Arabia, Afghanistan and Kuwait¹⁰⁵⁹. In the last 10 years, TUIK announced that foreigners acquired 381,422 properties.¹⁰⁶⁰ Foreigners has preferred to buy properties mostly from Istanbul, Antalya and Ankara. In 2024, housing sales to foreigners decreased by 31.5% compared to the previous year, reaching 23,975 units. Istanbul ranked first in housing sales to foreigners with 8,416 units sold, Antalya followed with 8,223 units, and Mersin with 2,112 units. Citizens of the Russian Federation purchased the most houses from Türkiye in 2024, buying 4,867 units. They were followed by Iranian citizens, who bought 2,166 houses; Ukrainian citizens, who bought 1,631 houses; and Iraqi citizens, who bought 1,283 houses.¹⁰⁶¹ According to a statement on October 2023, around 40 thousand foreigners obtain Turkish citizenship through purchasing property¹⁰⁶². As of the end of 2022, around 4,000 Afghans became citizens through economic investment.¹⁰⁶³

The General Directorate of Population and Citizenship Affairs of the Ministry of Internal Affairs clarified that the person who wants to get married in Türkiye must have the right to legally stay in the country.¹⁰⁶⁴

While some Syrian nationals under temporary protection have been able to access citizenship through the exceptional circumstances (see [Temporary Protection: Naturalisation](#)), access to citizenship is not provided

¹⁰⁵⁵ Mihci Law Office, 'Yatırım Yoluyla Türk Vatandaşlığı', last accessed 25 July 2024, available in Turkish [here](#)

¹⁰⁵⁶ Ibid.

¹⁰⁵⁷ Finans Gündem, 'Vatandaşlığı en ucuza satan 3 ülkeden biriyiz', 10 May 2022, available in Turkish [here](#)

¹⁰⁵⁸ Ibid.

¹⁰⁵⁹ Ibid.

¹⁰⁶⁰ TUIK, Konut Satış İstatistikleri, Aralık 2024, available [here](#)

¹⁰⁶¹ Ibid.

¹⁰⁶² Hürriyet, Meclis Göç ve Uyum Komisyonu Başkanı: Suriyeli Türkiye'den mülk alamıyor, 07.10.2023.

¹⁰⁶³ VOA, 15.06.2023, Afganistan'ın Ankara Büyükelçisi Ramin: "Göç tarihsel bir süreç sıfırlanamaz"

¹⁰⁶⁴ Medyascope, İçişleri Bakanlığı yabancı uyrukluların evlenmesine "kalış hakkı" zorunluluğu getirdi, 27.06.2024, available [here](#)

to non-Syrian nationals under international protection in practice. In 2024, no data on the numbers of non-Syrians nationals obtain Turkish nationalities was made available.¹⁰⁶⁵

5. Cessation and review of protection status

Indicators: Cessation

1. Is a personal interview of the beneficiary in most cases conducted in practice in the cessation procedure? Yes No
2. Does the law provide for an appeal against the first instance decision in the cessation procedure? Yes No
3. Do beneficiaries have access to free legal assistance at first instance in practice? Yes With difficulty No

Article 85 LFIP sets out the grounds and procedural rules governing cessation of international protection status.

The grounds for cessation of **refugee status** include the following cases where a beneficiary:¹⁰⁶⁶

- a. Voluntarily re-avails him or herself of the protection of their country of origin;
- b. Voluntarily re-acquires the nationality of the country he or she has lost;
- c. Has acquired a new nationality and enjoys the protection of the country of new nationality;
- ç. Has voluntarily returned to the country of origin;
- e. May no longer refuse to avail him or herself of the protection of the country of origin or habitual residence on the ground that the circumstances on which the status was granted no longer apply. In the assessment of change of circumstances, PMM shall assess whether the change in the country of origin or habitual residence is significant and permanent.¹⁰⁶⁷

Subsidiary protection may also be ceased where circumstances have changed to such an extent that protection is no longer needed.¹⁰⁶⁸

Cessation is to be decided on an individual basis.¹⁰⁶⁹ Where cessation grounds apply, PMM shall communicate the review of status to the beneficiary in writing. The beneficiary shall have the opportunity to present their reasons to continue receiving protection, orally or in writing.¹⁰⁷⁰ The RFIP refers to oral or written observations being submitted “within a reasonable period”, without specifying the timeframe in which the beneficiary should respond to PMM.¹⁰⁷¹

An appeal against a cessation decision may be lodged under the same conditions as in the [Regular Procedure: Appeal](#), before IPEC within 10 days or before the competent Administrative Court within 30 days.¹⁰⁷²

¹⁰⁶⁵ DW, İçişleri Bakanı: 238 bin 55 Suriyeli Türk vatandaşı oldu, 17.12.2023, available [here](#).

¹⁰⁶⁶ Article 85(1) LFIP.

¹⁰⁶⁷ Article 85(2) LFIP.

¹⁰⁶⁸ Article 85(3) LFIP.

¹⁰⁶⁹ Article 97(3) RFIP.

¹⁰⁷⁰ Article 85(4) LFIP.

¹⁰⁷¹ Article 97(1) RFIP.

¹⁰⁷² Article 80(1)(a) LFIP.

6. Cancellation of protection status

Indicators: Cancellation

1. Is a personal interview of the beneficiary in most cases conducted in practice in the cancellation procedure? Yes No
2. Does the law provide for an appeal against the cancellation decision? Yes No
3. Do beneficiaries have access to free legal assistance at first instance in practice? Yes With difficulty No

Cancellation (“withdrawal”) of international protection status is governed by Article 86 LFIP. The law provides that status shall be cancelled where a beneficiary: (a) by way of false documents, fraud, deceit, or withholding facts, was granted protection; or (b) should have been excluded from international protection.¹⁰⁷³

While LFIP does not expressly provide the same level of guarantees in cancellation procedures as in Cessation, as it makes no reference to a right of the beneficiary to present their observations,¹⁰⁷⁴ the possibility to submit oral or written observations “within a reasonable period” is provided in the RFIP.¹⁰⁷⁵ The remaining rules and procedures are the same as in Cessation.

B. Family reunification

1. Criteria and conditions

Indicators: Family Reunification

1. Is there a waiting period before a beneficiary can apply for family reunification? Yes No
 - ❖ If yes, what is the waiting period?
2. Does the law set a maximum time limit for submitting a family reunification application? Yes No
 - ❖ If yes, what is the time limit?
3. Does the law set a minimum income requirement? Yes No

Family reunification is governed by Articles 34-35 LFIP. While the law allows **refugees** and **subsidiary protection beneficiaries** to be reunited with family members,¹⁰⁷⁶ under preferential conditions compared to other foreigners, **conditional refugees** are excluded from family reunification altogether. That is also implied by the fact that international protection beneficiaries are not granted a **Residence Permit**, whereas the law requires the sponsor to have resided in Türkiye for more than one year on a residence permit.¹⁰⁷⁷ Refugees and subsidiary protection holders are expressly exempt from this condition, but conditional refugees are not.¹⁰⁷⁸

A refugee or beneficiary of subsidiary protection may reunite with the following family members:¹⁰⁷⁹

- Spouse, whereby only one spouse may benefit from family reunification in the case of polygamous marriages;¹⁰⁸⁰
- Minor children or minor children of the spouse;

¹⁰⁷³ Article 86(1) LFIP.

¹⁰⁷⁴ Article 86(2) LFIP.

¹⁰⁷⁵ Article 98(1) RFIP.

¹⁰⁷⁶ Article 34(1) LFIP; Article 30(1)(d) RFIP.

¹⁰⁷⁷ Article 35(1)(ç) LFIP.

¹⁰⁷⁸ Article 35(4) LFIP.

¹⁰⁷⁹ Article 34 LFIP; Article 30 RFIP.

¹⁰⁸⁰ Article 34(2) LFIP; Article 30(3) RFIP.

- Dependent children or dependent children of the spouse.

The Türk Kızılay had received 110 requests for family reunification as of December 2022, but only 9 instances have been satisfactorily handled. They also provide family tracing and messaging services. Only 8 of 238 family tracing requests were met, and only 33 of 119 family messaging requests were delivered successfully. Türk Kızılay initiated a fund-raising drive in 2022 to support their family reunification activities.¹⁰⁸¹ Refugee Rights Türkiye is also providing counselling on family reunification to unaccompanied refugee minors. Legal clinics supported by UNHCR provides legal support for family reunification cases. In 2024, no public data was shared.

Unaccompanied minors face numerous challenges during the family reunification process¹⁰⁸². Gathering documentation, waiting for appointments, and interfacing with shelter and migration authorities can take many months. For those living outside Istanbul or Ankara, additional hurdles include securing travel permits and consular appointments, and arranging for inter-city transport and accommodation. While some youth shelters actively support UAMs in their family reunification efforts, others only respond after a request is made. A major obstacle is the requirement for valid passports or travel documents, which many minors lack due to never receiving them, or because they were lost or confiscated during their journey. Consular authorities from some countries, like Afghanistan, complicate matters further by requiring parental consent for issuing passports. This can be particularly challenging if parents are deceased or unreachable, requiring death certificates or the consent of another relative. The financial burden of filing family reunification applications, including visa fees, document translation and notarization, shipping, and travel costs, is another significant challenge. Some costs may be covered by the sponsors, or NGOs such as RRT, to ensure the minors' right to family reunification.

2. Status and rights of family members

Upon arrival in Türkiye, family members receive a “family residence permit” for a maximum duration of validity of 3 years.¹⁰⁸³ Holders of this permit have access primary and secondary education institutions without obtaining a student residence permit.¹⁰⁸⁴

Adult family members on a family residence permit may apply to transfer to a short-term residence permit after 3 years of residence in Türkiye.¹⁰⁸⁵ However, this condition may be waived in cases where the spouse has been a victim of domestic violence,¹⁰⁸⁶ or in the event of death of the sponsor.¹⁰⁸⁷

C. Movement and mobility

1. Freedom of movement

PMM may restrict the residence of **conditional refugees** and **subsidiary protection** beneficiaries within a specific province and impose reporting requirements, for reasons of public security and public order.¹⁰⁸⁸ While LFIP makes no reference to **refugees**, who should enjoy freedom of movement across the territory

¹⁰⁸¹ Information provided by a stakeholder, June 2023.

¹⁰⁸² Refugee Solidarity Network and RRT, Reuniting Families: Opportunities and Challenges for Refugees in Turkey.

¹⁰⁸³ Article 34(1) LFIP.

¹⁰⁸⁴ Article 34(4) LFIP.

¹⁰⁸⁵ Article 34(5) LFIP.

¹⁰⁸⁶ Article 34(6) LFIP.

¹⁰⁸⁷ Article 34(7) LFIP.

¹⁰⁸⁸ Article 82(1) LFIP; Article 110(4) RFIP.

of Türkiye subject to the provisions of Article 26 of the 1951 Refugee Convention, the RFIP adds that such residence restrictions “may also be applicable for refugee status holders.”¹⁰⁸⁹

The RFIP complements Article 82 LFIP by adding criteria such as the “person’s request, their special situation, medical and educational situation, kinship relations, culture, personal circumstances and capacity of the provinces” in the determination of the province where a conditional refugee or subsidiary protection holder will be allowed to reside.¹⁰⁹⁰

In practice, beneficiaries of international protection are subject to the same “province of residence” dispersal policy governing the movement of asylum seekers (see [Reception Conditions: Freedom of Movement](#)).

2. Travel documents

Article 84(1) LFIP provides that **refugees** “shall be” provided (Refugee) Travel Documents as referred to in the 1951 Refugee Convention. PMM shall determine the “format, content and duration of validity” of (Refugee) Travel Documents to be issued to refugee status holders in accordance with the 1951 Convention.¹⁰⁹¹ Neither the law nor its Implementing Regulation set out a strict duration of validity for refugee travel documents.

Regarding **conditional refugees** and beneficiaries of **subsidiary protection**, “if they make a request for a travel document”, their request “shall be evaluated” in reference to Article 18 of the Passports Law.¹⁰⁹² Article 18 of the Passports Law governs the issuing of special travel documents that may be issued to foreign nationals referred to as “passports with a foreign-nationals-only stamp” (*Yabancılar Mahsus Damgalı Pasaport*).

As such, conditional refugees and subsidiary protection holders are not issued Convention Travel Documents but “may be” issued another type of travel document referred to as “passport with a foreign-nationals-only stamp”. The wording used in Article 84(2) LFIP suggests that the decision as to whether to grant a travel document upon request by a conditional refugee or subsidiary protection holder is subject to the discretion of PMM and is therefore not a right as such.

Under Article 18 of the Passports Law, there are two types of “passport with a foreign-nationals-only stamp”:

- The type that authorises either a single exit or a single entry and has a 1-month duration of validity; and
- The type that authorises a single exit and a single entry. The duration of validity of this type of passport is subject to Ministry of Interior discretion but “shall not be less than 3 months”.

Stakeholders reported that, in 2021, only one individual with conditional refugee status was issued a travel document—after a four-year effort—and it permitted only a single exit and re-entry.¹⁰⁹³

3. Resettlement

UNHCR works in collaboration with PMM to identify the most vulnerable cases and to assess their eligibility for resettlement. As of 10 September 2018, PMM pre-identifies cases based on vulnerability and refers them to UNHCR, similar to the procedure already followed for temporary protection beneficiaries (see [Temporary Protection: Resettlement](#)). In general, stakeholders have noticed that the criteria and standards of ‘vulnerability’ used now by PMM are different from the ones of UNHCR and NGOs. For instance, LGBTQI+ people or people living with HIV are not considered as vulnerable.¹⁰⁹⁴ The final decisions on resettlement are taken by the receiving countries.

¹⁰⁸⁹ Article 110(5) RFIP.

¹⁰⁹⁰ Article 110(1) RFIP.

¹⁰⁹¹ Article 104 RFIP.

¹⁰⁹² Article 84(2) LFIP; Article 104(2) RFIP.

¹⁰⁹³ Information provided by a stakeholder, February 2025.

¹⁰⁹⁴ Information provided by a stakeholder, May 2023.

In 2022, due to the great demand, UNHCR expanded its resettlement team, creating two new interview sites in Istanbul and Gaziantep, and is exploring additional complementary options for refugees through labour mobility and educational opportunities. According to PMM statistics, as of June 2025, 72,155 Syrians had been resettled (since 2016) to the EU, USA, Canada, Australia, New Zealand, UK, Switzerland, and Norway.¹⁰⁹⁵

In response to the earthquakes,¹⁰⁹⁶ several countries, including Canada, France, Germany, Norway, Spain, the United Kingdom, and the United States, increased their intake of refugees from affected areas. In 2024, around 13 EU countries were expected to be a part of the resettlement efforts, including Belgium, the Netherlands, Slovenia, Italy, Finland, France, Norway, Ireland,¹⁰⁹⁷ which is confirmed by PMM statistics except Ireland.¹⁰⁹⁸ IOM collaborated with these resettlement countries to provide accommodation during the interview process in Ankara and Istanbul and before departure, facilitated rapid visa and exit permit processing, expedited departures using commercial and charter flights, and provided medical support and non-food items to those in need.

According to the UNHCR, as of September 2024, more than 11,000 resettlement submissions were made, 79 percent of which were for refugees from Syria in the earthquake affected region. Over 6,800 refugees departed to third countries.¹⁰⁹⁹

Regarding the complementary pathways, 7 students went to Italy and 2 to Lithuania with scholarships from universities, additionally three refugees left for Canada through labour pathway opportunities.¹¹⁰⁰

In 2024, guardianship, custody, and trusteeship arrangements emerged as key challenges in the context of resettlement. When one parent—typically the father—has left, the remaining parent often faces significant difficulties managing administrative and legal procedures for the child. Even in cases where the remaining parent retains full custodial rights, authorities may still require written consent from the absent parent in order to permit the child to cross the border. This requirement creates practical barriers for families, particularly when the absent parent cannot be located or contacted.

D. Housing

Similar to the situation of applicants (see [Reception Conditions: Housing and Temporary Protection Housing](#)), beneficiaries of international protection are expected to secure accommodation through their own means in Türkiye.

E. Employment and education

1. Access to the labour market

Regarding the right to employment, the law draws a distinction between the different categories of international protection beneficiaries. **Refugees** and **subsidiary protection** holders have access to employment or self-employment after being granted status, on the basis of their International Protection Holder Identity Document without satisfying additional requirements.¹¹⁰¹

These categories of beneficiaries also have preferential treatment with regard to the applicability of labour market tests. Any sectoral or geographical restriction on access to employment cannot be imposed on

¹⁰⁹⁵ See PMM, Temporary protection, available [here](#)

¹⁰⁹⁶ IOM, 2024, Türkiye and Northwest Syria Earthquake Response and Recovery 2023 Achievements Report

¹⁰⁹⁷ AIDA, Resettlement and family reunification departures Türkiye, 20.08.2024, available [here](#).

¹⁰⁹⁸ PMM, Temporary protection, available [here](#).

¹⁰⁹⁹ UNHCR, Bi annual fact sheet, September 2024, available [here](#).

¹¹⁰⁰ UNHCR Factsheet Türkiye September 2023, available [here](#).

¹¹⁰¹ Article 89(4)(b) LFIP; Article 4 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

refugees or beneficiaries of subsidiary protection who have resided in Türkiye for 3 years, are married to a Turkish citizen, or have a Turkish child.¹¹⁰²

Conversely, **conditional refugees** are subject to the same rules as applicants for international protection. They are required to apply for a work permit, or for a work permit exemption in the sectors of agriculture and livestock works, after 6 months of being granted protection.¹¹⁰³ Therefore, they may also be subject to sectoral or geographical limitations on access to the labour market (see [Reception Conditions: Access to the Labour Market](#)).

In practice, it seems that only a few conditional refugees are able to access work permits.¹¹⁰⁴ Data on the matter has not been made public in 2024. According to stakeholders, a limited number of individuals who obtain work permits are allowed to change their province of residence if their job requires relocation. In practice, most of these individuals move to Istanbul under this procedure. However, after residing in Istanbul for several years with a work permit, if they leave their job, they are required to return to their previous province of residence. This creates significant challenges for relocating again after years of living elsewhere. This policy is tied to the province of residence policies, which are designed to keep individuals in smaller cities rather than allowing them to concentrate in major urban centres. (For similar practices See: Travelling outside the province of residence and sanctions)

In 2024, amid a growing number of rejection decisions, stakeholders observed that many work permit holders were at risk of losing their permits due to the rejection of their international protection applications, which impacts their overall legal status.

2. Access to education

The LFIP draws no distinction between applicants for and beneficiaries of international protection in relation to access to education (see [Reception Conditions: Access to Education](#)).

F. Social welfare

The LFIP draws no distinction between applicants for and beneficiaries of international protection in relation to social assistance (see [Forms and Levels of Material Reception Conditions](#)).

G. Health care

The LFIP draws no distinction between applicants for and beneficiaries of international protection in relation to health care (see [Reception Conditions: Health Care](#)).

¹¹⁰² Article 18 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

¹¹⁰³ Article 89(4)(a) LFIP; Articles 6 and 9 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

¹¹⁰⁴ Refugees International, *I am only looking for my rights: Legal employment still inaccessible for refugees in Türkiye*, December 2017, available [here](#), 5.

Temporary Protection

Temporary Protection Procedure

The legal basis of the 2014 Temporary Protection Regulation (TPR) is Article 91 LFIP. Therefore, technically as a piece of secondary legislation, the provisions and implementation of the TPR must be compliant and consistent with the general normative framework laid down by the LFIP itself.

PMM is designated as the competent agency authorised to decide on the eligibility of persons for temporary protection in Türkiye in light of the scope laid down by the Presidency declaration decision and the general eligibility criteria laid down in the TPR.¹¹⁰⁵

A. Scope and activation procedure

Temporary protection within the scope of Article 91 LFIP is a discretionary measure that may be deployed in situations of mass influx of refugees where individual processing of international protection needs is impractical due to high numbers.¹¹⁰⁶ As such, temporary protection under the TPR is not defined as a form of international protection but a complementary measure used in situations where individual international protection eligibility processing is deemed impractical.

The application of the Temporary protection regime is to be declared by a decision of the Presidency.¹¹⁰⁷ The declaration decision shall elaborate the scope of beneficiaries, the start date of the temporary protection regime and its duration, where necessary.¹¹⁰⁸ It may or may not designate a limitation on the implementation of the temporary protection regime to a specific region in Türkiye. An existing temporary protection regime in place is to be terminated by a Presidency decision.¹¹⁰⁹

The Presidency has the authority to order limitations on temporary protection measures in place, or the suspension of existing measures for a specific period or indefinitely, “in the event of circumstances threatening national security, public order, public security and public health”.¹¹¹⁰ In such a case, the Presidency shall have the discretion to determine the specifics of the treatment existing registered temporary protection beneficiaries and measures that will be applied to persons within the scope of the temporary protection regime who approach Türkiye’s borders after the limitation or suspension decision. Such very broadly and vaguely defined limitation or suspension measures are different from the actual termination of a temporary protection regime by means of a Presidency decision in accordance with Article 11 TPR.

B. Qualification for temporary protection

1. Eligibility criteria

The principal characteristic and justification of the temporary protection approach generally is to swiftly attend to the protection needs of a large number of protection seekers in a situation of mass influx of refugees where individual processing is considered both impractical and unnecessary. The temporary protection approach is meant to categorically apply to and benefit all persons falling within the scope of beneficiaries formulated by the host Government, without any personalised assessment of international protection needs.

While generally a Presidency decision is required for the declaration of a temporary protection regime, in the case of the TPR in place for persons escaping the conflict in Syria, the Turkish Government opted to formalise the existing *de facto* temporary protection regime already in place since 2011 by means of a

¹¹⁰⁵ Article 10 TPR.

¹¹⁰⁶ Articles 1 and 3 TPR.

¹¹⁰⁷ Article 9 TPR.

¹¹⁰⁸ Article 10 TPR.

¹¹⁰⁹ Article 11 TPR.

¹¹¹⁰ Article 15 TPR.

provisional article incorporated in the main text of the TPR itself – as opposed to issuing a separate Presidency decision.

1.1. “Syrian nationals, stateless persons and refugees”

Provisional Article 1 TPR specifically establishes that “Syrian nationals, stateless people and refugees” who have arrived in Türkiye, whether individually or as part of a mass movement of people, due to events unfolding in Syria, are eligible for temporary protection in Türkiye.

This formulation appears to indicate that in addition to Syrian nationals; stateless persons originating from Syria, including members of the substantial stateless Palestinian population who were resident in Syria at the time of the beginning of the conflict in 2011, are also covered by the TPR. Practice is consistent with this interpretation, as stateless Palestinians from Syria are registered as temporary protection beneficiaries.¹¹¹¹

1.2. “Directly arriving from Syria”

Provisional Article 1 TPR contains a phrasing which in practice is interpreted by border officials as a requirement for prospective beneficiaries to arrive directly from Syria, as opposed to travelling to Türkiye from or via a third country.

The provision speaks of persons who “arrive at our borders” or “have crossed our borders”, whether “individually” or “as part of a mass movement of people”. As such, it actually does not articulate a clear requirement of arriving directly from Syria at all. A person taking a plane from a third country and landing in a Turkish airport may be understood to have “arrived at our borders” “individually”. Since 8 January 2016, however, Türkiye no longer operates a visa-free regime for Syrians who enter by sea or air.

The imposition of visa requirements for persons coming by sea or air has been combined with strict enforcement of Provisional Article 1 TPR. Accordingly, PMM only admits into the temporary protection regime Syrians who arrive directly from Syria.¹¹¹² Those arriving through a third country are excluded from the temporary protection regime. Although they should be allowed to apply for international protection under the LFIP, in practice they are not registered as international protection applicants. This includes Syrian nationals who may arrive through another country even if their family members in Türkiye already benefit from temporary protection.¹¹¹³

In some cases, PDMM have referred these persons for a short-term visa and then a short-term residence permit.¹¹¹⁴ Health care and other benefits are not accessible free of charge on a short-term residence permit.

1.3. The cut-off date of 28 April 2011

Provisional Article 1 TPR also provides a cut-off date for purpose of inclusion in the temporary protection regime. It provides that persons who have arrived from Syria from 28 April 2011 or later are to be exclusively processed within the framework of the temporary protection regime. As such, they shall be barred from making a separate international protection application. If they had already made an application for international protection before the publication of the TPR on 22 October 2014, these applications were suspended and the persons concerned were instead processed as temporary protection beneficiaries.

Any persons who had arrived in Türkiye prior to 28 April 2011 and had already made an application for international protection were given the option of choosing whether they wished to remain within the international protection procedure framework or benefit from temporary protection. The number of Syrian

¹¹¹¹ Information provided by a lawyer of a Bar Association, March 2019.

¹¹¹² Zeynep Kivilcim, ‘Lesbian, gay, bisexual and transsexual (LGBT) Syrian refugees in Türkiye’, 2016, 29.

¹¹¹³ Information provided by NGOs, March 2019.

¹¹¹⁴ *Ibid.*

nationals concerned by this provision is however very limited, since the population of Syrian asylum seekers in Türkiye in early 2011 before the beginning of the conflict in Syria was low.¹¹¹⁵

In 2024, the Minister of Interior, Ali Yerlikaya, stated that Türkiye had not registered any new Syrian nationals since June 2022. Minister Yerlikaya stated that they have stopped migration at its source thanks to the safe zones created after the operations carried out in northern Syria. Minister Yerlikaya said, "We have created a safe zone in Syria both against the terrorist corridor and to prevent migration. Seven million people live near our borders, including three million in Idlib. We are not allowing anyone to cross our border. We have built a 911 km wall. We have stopped migration at its source."¹¹¹⁶

1.4. Syrian nationals with regular residence permits

Similarly, any Syrian nationals who were legally resident in Türkiye as of 28 April 2011 or later, on the basis of a regular residence permit completely outside the asylum framework – like other nationalities of legally residing foreigners – are allowed the option of continuing their legal residence in Türkiye on this basis, unless they wish to register as temporary protection beneficiaries. In fact, the relatively small number of Syrian nationals who continue to arrive in Türkiye legally with valid passports in the period since the adoption of the TPR on 22 October 2014 still maintain this option.

In order for a foreign national to request and obtain a residence permit after they arrive in Türkiye, he or she needs to have legally entered the country with a valid passport and either based on a short-stay visa or visa-exemption grounds depending on the nationality. Since 2016, however, Türkiye no longer allows visa-free entry to Syrian nationals. One problem encountered by such Syrian residence permit holders is that when and if the validity period of their passport expires and they do not generally manage to have it extended, they are no longer eligible for an extension of their residence permit.

2. Cessation of temporary protection

Indicators: Cessation

1. Is a personal interview of the temporary protection beneficiary in most cases conducted in practice in the cessation procedure? Yes No
2. Does the law provide for an appeal against the first instance decision in the cessation procedure? Yes No
3. Do beneficiaries have access to free legal assistance at first instance in practice? Yes With difficulty No

Temporary protection status shall cease for a particular beneficiary where he or she:¹¹¹⁷

- a. Leaves Türkiye voluntarily;
- b. Avails him or herself of the protection of a third country;
- c. Is admitted to a third country on humanitarian grounds or for resettlement.

2.1. Voluntariness of repatriation

The TPR does not specify how the cessation criterion of voluntary departure from Türkiye is to be assessed. In theory, when a temporary protection beneficiary indicates the intention to return to Syria, he or she is interviewed by a panel consisting of PMM, UNHCR and civil society; the latter not being applied in practice. A lawyer can also be present in the interview. The panel assesses whether return is in fact voluntary and the underlying reasons behind it. UNHCR does not have any program for those who want to return voluntarily, but they continue to monitor voluntary returns to Syria in a number of provinces through presence at PDMMs¹¹¹⁸. UNHCR does not monitor all voluntary returns.

¹¹¹⁵ Information provided by a stakeholder, May 2022.

¹¹¹⁶ T.C., Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya: "Göçü Kaynağında Durdurduk", 14.08.2024, available [here](#).

¹¹¹⁷ Article 12(1) TPR.

¹¹¹⁸ Information provided by a stakeholder, March 2024.

Voluntary, safe, and dignified returns have continued to be a priority policy area for the PMM in 2023, which established its voluntary return programme in 2021. As a reaction to rising anti-refugee sentiment stroked by opposition parties and the society calling for the return of Syrians to Syria, President Erdoğan has promised to relocate at least 1 million Syrians in Turkish-controlled regions of northern Syria. In 2024, the voluntary, safe, and dignified return programme continued. Between 1 January and 31 October 2024, 114,083 Syrians under temporary protection returned to Syria within the scope of this programme.¹¹¹⁹ After December 2024, following the regime change in Syria, the programme began to be referred to as the voluntary, safe, dignified, and regular return programme.¹¹²⁰ In the initial days after the regime change, the number of returns increased significantly, reaching up to 1,000 individuals per day.¹¹²¹

According to Minister of Interior Ali Yerlikaya, as part of efforts to improve living conditions in Syria and what he referred to as "stopping migration at its source," a total of 763,443 Syrians under temporary protection returned to Syria between 2017 and 22 December 2024. When comparing the two-week periods before and after 9 December 2024, the data reveals a significant increase in returns. Between 25 November and 8 December 2024, a total of 3,433 individuals (572 families) returned. In contrast, between 9 and 23 December 2024, the number rose to 23,440 individuals (4,136 families), indicating a 6.8-fold increase. This shift corresponds to a rise in the daily average of returns from approximately 245 individuals (41 families) to 1,647 individuals (295 families) after 9 December. Yerlikaya explicitly emphasized that returns must be voluntary and not conducted against individuals' will.

Returns have been conducted through six border gates: Hatay Cilvegözü, Kilis Öncüpınar, Hatay Yayladağı, Gaziantep Karkamış, Hatay Zeytindalı, and Şanlıurfa Akçakale. As of 8 December 2024, the combined daily capacity across these gates was 3,020. Following this date, the total capacity was increased to 19,000 returnees per day—specifically: Karkamış (5,000), Akçakale (2,000), Öncüpınar (4,000), Zeytindalı (1,500), Cilvegözü (5,000), and Yayladağı (1,500). Additionally, the working hours of the border gates were extended to operate 24/7. In the first two weeks following the regime change, the top three provinces in Türkiye from which returns took place were Gaziantep, Hatay, and İstanbul. On the Syrian side, returnees primarily arrived in Aleppo, Idlib, and Latakia. During this period, 16,514 individuals returned with their families, while 6,926 individuals returned alone. In terms of age distribution, the largest group was aged 19–65 (12,360 individuals), followed by 0–12 years (9,055), 13–18 years (1,707), and those aged 65 and over (318).

Thanks to the appointment system available on the PMM's website, individuals wishing to return can be assigned an appointment on the same day they apply. Once an individual applies for voluntary repatriation, their fingerprints are first taken, and a check is conducted through the UYAP system to determine whether there is any outstanding arrest warrant or restriction code. Following this process, the individual is issued a travel permit allowing them to travel across provinces. The voluntary repatriation form is completed in the individual's own handwriting and signed while being recorded on camera. A third-party observer—such as a representative from UNHCR, the Turkish Red Crescent, or the Provincial Human Rights Monitoring Commission which is overseen by the Human Rights and Equality Institution of Türkiye (TİHEK) and the governorates—is present during this procedure. Subsequently, the V-87 code is issued, and the individual hands over their identity document to the border police. Finally, at the point of crossing, the individual's fingerprint is checked once again. Additionally, Mr. Yerlikaya stated that customs regulations would be eased to facilitate returns, allowing individuals to take their household goods with them. He also noted that the licenses of their vehicles would be cancelled in Türkiye so that they could be used in Syria.

Ali Yerlikaya also explicitly stated that, during voluntary repatriation interviews, returnees are asked where they plan to spend the night upon arrival in Syria. He acknowledged the harsh conditions in the country, noting that there is no money in the central bank, health services are severely limited, and even government employees are not receiving their salaries. Despite these circumstances, thousands of individuals continue to return. Yerlikaya added that they expect those who have returned to inform others who remain in Türkiye about the conditions on the ground.

¹¹¹⁹ Göç İdaresi Başkanlığı, X (Twitter), 21.11.2024, available [here](#).

¹¹²⁰ T.C. Göç İdaresi Başkanlığı, Gönüllü, Güvenli, Onurlu ve Düzenli Geri Dönüş, available [here](#).

¹¹²¹ Ali Yerlikaya, X (Twitter), 15.12.2024, available [here](#).

Mr. Yerlikaya emphasized that the Turkish government holds comprehensive personal data on returned Syrians, including their names, family records, and passport information. He stated that PMM offices would be established within Turkish consulates in Syria to prevent any conflicts or misuse of personal data. He also underlined that Türkiye is ready to assist Syrian officials if requested. However, Mr. Yerlikaya did not clarify whether the personal data of returnees would be explicitly shared with Syrian authorities, nor whether individual consent would be required in such cases.

Go and See” Visits: Ali Yerlikaya announced that individuals who wish to observe the conditions in Syria before deciding whether to return will be allowed to make up to three “go and see” visits between 1 January and 1 July 2025. This permission will be granted to one person per family. Yerlikaya stated that this person would typically be the “head” of the family, referred to as the *pioneer (öncü)*; if such a person is not present, another adult chosen by the family will be permitted. These visits will be allowed only through two designated border gates.¹¹²² As of June 2025, 27,000 individuals have been granted permission to make use of this opportunity.¹¹²³ According to Ali Yerlikaya, between 9 December 2024 and June 2025, approximately 250,064 Syrians—corresponding to around 48,000 families—returned to Syria. This brings the total number of returns since the end of 2016 to 1,000,226.¹¹²⁴

During his official visit to Türkiye, United Nations High Commissioner for Refugees Filippo Grandi expressed strong support for Türkiye’s refugee policies, particularly in relation to voluntary repatriation efforts. He praised Türkiye’s “go-and-see” visits policy during his recent visit, calling it a best practice. He highlighted that the initiative helps refugees assess conditions in Syria first hand, supporting informed and sustainable voluntary returns.¹¹²⁵

Human Rights Watch reported that Turkish authorities arbitrarily arrested, detained, and deported hundreds of Syrian men and boys to Syria between February and July 2022 and urged the EU to recognize Türkiye as unsafe for asylum seekers.¹¹²⁶ Turkish authorities have been arguing that returns are “voluntary”.¹¹²⁷ Syrians consistently say they are being misled about the “voluntary return” forms they are being told or forced to sign, i.e. through intimidation, threats and beatings. Voluntary returns and “the serious suspicion that they are involved in a criminal act” were the primary reasons for cancellation. This is contrary to the presumption of innocence, and authorities frequently interpret it when a Syrian refugee is a plaintiff, witness, or subject of a criminal investigation. Therefore, Syrian victims fear deportation and do not dare lodge complaints with the authorities.¹¹²⁸ Syrian Observatory for Human Rights (SOHR) reported that despite the claims, “Syrians, most of whom have temporary protection IDs, are forcibly deported to Syria every day, on the grounds that they do not have official documents.”¹¹²⁹ Global Detention Project highlighted refugees are coerced into “voluntary return” through ill-treatment to free up space in overcrowded deportation centres.¹¹³⁰

According to two reports, one by the Union of Turkish Bar Associations (UTBA), other by Mazlumder, ULFED and The Platform of Rights of Asylum Seekers, the practice of coercing individuals into signing voluntary repatriation forms is primarily used to return those held in administrative detention while awaiting a court decision on their objection to a deportation order. This practice aims to expedite the procedure and create the appearance that the individual has voluntarily withdrawn their case. There are documented instances where the voluntary repatriation form is included among the standard documents at removal centers, as if it were an ordinary form to be signed. In one case, a form was signed just half an hour after the individual had issued a power of attorney to a lawyer for the purpose of filing a legal challenge against the deportation order—raising serious doubts about the voluntariness of the return.¹¹³¹ In 2024, lawyers continued to submit documents signed by their clients to removal centre files, explicitly stating that the individuals did not wish to return to their countries of origin voluntarily. Some lawyers also began to include phrases such as “I absolutely do not wish to return to my country due to the ongoing civil war and because

¹¹²² Anadolu Ajansı, İçişleri Bakanı Ali Yerlikaya, AA Editör Masası'nda soruları yanıtladı.

¹¹²³ Habertürk, İçişleri Bakanı Ali Yerlikaya Özel Röportaj'da Soruları Yanıtıyor, 05.06.2025, available [here](#).

¹¹²⁴ Habertürk, *ibid*.

¹¹²⁵ Reuters, Hope turns to regret among Syrians returning home from Turkey, 06.02.2025, available [here](#).

¹¹²⁶ Human Rights Watch, Turkey: Hundreds of Refugees Deported to Syria, 24 October 2022, available [here](#).

¹¹²⁷ Milliyet, 'Bir milyondan fazla Suriyeli evine döndü', 21 January 2022, available [here](#).

¹¹²⁸ Information provided by a stakeholder, May 2023.

¹¹²⁹ Biance, 26.02.24, SOHR: "Türkiye Suriyeli mültecileri zorla geri göndermeye devam ediyor, available [here](#)

¹¹³⁰ Global Detention Project, Türkiye: Submission to the Committee against Torture, June 2024.

¹¹³¹ TBB *ibid*, Mazlumder, Göç Politikasını Beraber İyileştirelim!, 20.06.2025, available [here](#).

my family is in Türkiye,” and “I do not wish to return voluntarily or by force due to life-threatening risks upon return” into powers of attorney, even when the statement did not directly relate to the specific legal authority being granted but served instead to clarify the context or motivation behind the authorisation.¹¹³²

In 2024, an administrative court issued a decision of “*no ground to render a judgment*” in a case concerning a deportation order against a Syrian national. The decision was based solely on the submission of a renunciation petition by the applicant from within the removal centre, approximately two months after the case had been initiated. This was despite the applicant’s lawyer stating that their client had no genuine intention to return. The court did not examine the circumstances under which the petition was signed, nor did it assess whether the applicant’s consent was informed, voluntary, and free from coercion. No inquiry was made into the credibility or voluntariness of a single written statement obtained in detention, raising serious concerns about the reliability of such declarations as a basis for terminating legal proceedings.¹¹³³

Stakeholders have explicitly noted that, beyond cases of clearly forced returns, some individuals find themselves in a grey area between voluntary and forced repatriation. In particular, when a father is forcibly returned, it often results in the subsequent return of the remaining family members, who may feel compelled to follow due to economic, social, or familial pressures rather than a genuine willingness to return. In some cases, mothers were contacted by the authorities and asked whether they wished to return, in light of the absence of their husbands and the fathers of their children.¹¹³⁴

Following December 2024, while some Syrians have begun to consider the option of returning to their home country, many remain hesitant, choosing instead to wait and observe the situation before leaving the stability they have established in Türkiye.¹¹³⁵ Stakeholders observed a noticeable trend in return dynamics, with primarily men expressing a willingness to return, while women and children generally demonstrated greater reluctance. This reluctance was particularly pronounced among women, who were hesitant to forgo the rights and protections they had accessed in Türkiye—rights which they perceived as being significantly more limited or absent in Syria.¹¹³⁶

Two important decisions support the claims regarding forced return of Syrians being carried out.

On February 15, 2023, the Constitutional Court General Assembly ruled on the application of Wisam Sulaiman Dawood Eaqadah (Application No: 2021/2831). The Court decided that the claims regarding the violation of the prohibition of ill-treatment and the right to an effective remedy in connection with the freedom of settlement, within the context of procedural safeguards in deportation processes, were clearly unfounded and therefore inadmissible. In the Abdulkerim Hammud decision (Application No. 2019/24388, Decision Date May 2, 2023), the Constitutional Court of Türkiye examined, for the first time, an individual application alleging forced return to Syria. The Court unanimously ruled that there had been violations of the right to life and the prohibition of ill-treatment as protected under Article 17 of the Constitution, as well as the right to an effective remedy under Article 40, in parallel with the European Court of Human Rights decision in Akkad v. Türkiye.

The European Court of Human Rights convicted Türkiye in a lawsuit filed on the grounds that Türkiye illegally deported a Syrian temporary protection holder to his country.¹¹³⁷ In 2022, the European Court of Human Rights found a violation of articles 3, 5 and 13 of the ECHR in Akkad v. Türkiye judgement on the ground of expulsion of the temporary protection holder applicant to Syria¹¹³⁸.

Some INGOs - such as IHH - and their contractors are active in the Azzez region. Even though people are settled in the region, the conditions are quite harsh due to the extreme conditions. For instance, hospitals

¹¹³² Information provided by multiple stakeholders, May and June 2025.

¹¹³³ İstanbul 16. İdare Mahkemesi 2024/3997 E., 2024/6439 K., 03.10.2024 T.

¹¹³⁴ Information provided by multiple stakeholders, February and May 2025.

¹¹³⁵ AP, The warm Turkish welcome for refugees is ending and Syrians are worried, 20.12.2024, available [here](#).

¹¹³⁶ Information provided by a stakeholder, April 2025.

¹¹³⁷ Information provided by a lawyer of a Bar Association, February 2020.

¹¹³⁷ On the contrary, decisions of the Administrative Court are notified to the PDMM since they are party to the proceedings.

¹¹³⁷ ECHR, Akkad v. Türkiye, application number: 1557/19, 21 June 2022, available [here](#).

¹¹³⁸ AKKAD v. TURKEY [Turkish Translation] by İstanbul Bar Association, available [here](#).

do not function properly; given that the lack of schools and employment opportunities in the area, Syrians do not wish to return to Turkish-controlled territories. Residing in containers is not sustainable either. Stakeholders view Turkish policy as unsustainable, and an international consensus must eventually be reached. Syrians who are deported to Syria either obtain a visa to enter Syria or are deported to Turkish-controlled territory.¹¹³⁹

Where temporary protection is terminated based on cessation, PMM issues a “V87” code to mark the person as a “voluntarily returned foreigner”. The person is usually left at the border and handles the return process him or herself.¹¹⁴⁰ However, beneficiaries are not always adequately informed of the process.

Moreover, the aforementioned interview procedure is not followed in Removal Centres. Persons signing voluntary return documents – often following pressure from authorities (see [Detention of Asylum Seekers](#)) – do not undergo an interview by a panel aimed at establishing whether return is voluntary.¹¹⁴¹ This practice remained the same in 2024 and the beginning of 2025 as well.

If a Syrian individual wishes to voluntarily return to Syria with their children in the absence of the other parent, this creates a legal challenge. Turkish authorities maintain a strict requirement for the non-accompanying parent to provide a notarized consent document (muvafakatname). In cases where the other parent is unavailable—due to prior deportation, loss of contact, or similar circumstances—authorities require either a custody annulment (velayet iptali) or a guardianship appointment decision (vesayet kararı). As these are lengthy legal procedures, efforts have been made to identify faster solutions. In January 2025, a court in İzmir appointed a representative trustee (temsil kayyımı) for an individual’s grandchild whose parents were missing. The court explicitly authorized the trustee to ‘accompany the minor in the event of return to Syria. Stakeholders reported that many mothers, whose husbands were either forcibly returned or returned voluntarily and subsequently lost contact, are unable to return to Syria with their children. These women may face prolonged waiting periods—potentially lasting years—until the necessary legal procedures are resolved. In another case in 2024, a court in Istanbul dismissed a custody claim made by a mother seeking custodial rights to take her child back to Syria. The parents were married through a religious marriage (imam nikahı) in Türkiye, which is not legally recognized in the country. The court ruled that there was no need to decide on custody because, under Turkish Civil Law, custody automatically belongs to the mother.¹¹⁴²

2.2. Re-entry following cessation

It is common for refugees to travel back to Syria for administrative reasons e.g. renewal of passport, and then to return to Türkiye.¹¹⁴³ This policy has changed for holiday permits granted to Syrians during religious holidays. Since 2022, ‘holiday permits’ are not given to Syrians.¹¹⁴⁴

In 2023, Syrians under temporary protection who are registered and residing in the earthquake-affected provinces (Kahramanmaraş, Hatay, Gaziantep, Malatya, Kilis, Osmaniye, Diyarbakır, Adana, Adıyaman, Şanlıurfa) could – on an exceptional basis - temporarily return to Syria without losing their temporary protection status. The period was between 14 February and 15 September 2023, with staying maximum of six months. Syrians under temporary protection residing in one of these provinces could directly apply to local authorities at the border gate without obtaining a travel permit document from the province they reside in¹¹⁴⁵. The permission was extended by December 2023. There are statements indicating that more than 90% of Syrian who visited Syria with this permission returned back to Türkiye, however there is a considerable number of persons staying in the provinces they moved to after the earthquake.¹¹⁴⁶

¹¹³⁹ Information provided by a stakeholder, May 2023.

¹¹⁴⁰ Information provided by a stakeholder, May 2023.

¹¹⁴¹ Information provided by a stakeholder, May 2023.

¹¹⁴² Information provided by multiple stakeholders, February, March, April and May 2025.

¹¹⁴³ Information provided by a stakeholder, May 2023.

¹¹⁴⁴ Hürriyet, ‘Bayrama giden kalacak’, 2022, available [here](#) & information provided by stakeholders, March – April 2024.

¹¹⁴⁵ UNHCR Help Türkiye, Duyurular, 14.02.2023, available [here](#)

¹¹⁴⁶ Information provided by stakeholders, March – April 2024.

As of 1 January 2025, “go and see” visits officially began, as previously noted. Stakeholders noted that these visits initially took place through the Çobanbey and Zeytindalı border gates, with Yayladağı later added to the list. The duration of the permission granted for these visits was limited to 15 days.

Approximately 15,000 individuals returned to Türkiye following these visits and were issued a V-175 restriction code. This code obliges returnees to report to the PDMM in their province of registration and update their address in order to lift the restriction and reactivate their Temporary Protection (TP) IDs. However, returnees were not informed about the existence of this code by PDMM officials; instead, many became aware of it only when they attempted to access services such as hospitals.

Permission for these visits was granted exclusively to the “pioneer” (*öncü*) of the family—typically the male head of household (*reis*). There are reported cases in which single men without families and single women with children were denied access to this right. A single elderly woman with cancer travelled from her province of residence, Samsun, to the border gate but was denied permission to participate in the visit. Although the official grounds for the refusal remain unclear, stakeholders are of the opinion that the “pioneer” rule has been strictly interpreted to mean male family members.¹¹⁴⁷

Admission to the temporary protection regime of persons who previously benefitted from temporary protection in Türkiye but their status was ceased is assessed on an individual basis by PMM.¹¹⁴⁸ PMM is authorised to grant or deny renewed access to temporary protection status upon repeat arrival in Türkiye.

There continue to be cases of people whose temporary protection status was ceased, and who were issued a “V87” code, being unable to re-access rights upon return to Türkiye. PMM issued a Circular on 7 January 2019, instructing PDMM to lift the “V87 code” in respect of persons returning to Türkiye after having signed a “voluntary return document”, especially pregnant women, elderly persons and children, as of 1 January 2019, to allow them to re-access services.¹¹⁴⁹ The Circular also requires PDMM to provide detailed information to temporary protection beneficiaries on the legal implications of signing a “voluntary return document”.

Deportation for registered Syrians was deactivated, and a code called C-114 was issued. Deportations are mostly on weekends, and people sign voluntary return forms without knowing their purpose. The ‘V-87’ circular had a positive effect, but interviews for those whose temporary protection had been cancelled were held mainly for vulnerable refugees with no criminal record in Türkiye.¹¹⁵⁰

The question of cessation has also arisen in the context of the readmission of Syrian nationals from **Greece** to Türkiye under the EU-Türkiye statement. An amendment to the TPR was introduced on 5 April 2016 to clarify that Syrian nationals, who entered Türkiye after 28 April 2011 and who transited irregularly to the Aegean islands after 20 March 2016, “may” be provided temporary protection.¹¹⁵¹ PMM statistics refer to 412 Syrian “irregular migrants” readmitted by Türkiye from 4 April 2016 to 5 April 2021 – an increase of 8 persons in 2020.¹¹⁵² These returns were still suspended in 2024 as far as stakeholders were aware.

3. Exclusion and cancellation of temporary protection

Indicators: Cancellation

1. Is a personal interview of the temporary protection beneficiary in most cases conducted in practice in the cancellation procedure? Yes No
2. Does the law provide for an appeal against the cancellation decision? Yes No
3. Do beneficiaries have access to free legal assistance at first instance in practice?
 Yes With difficulty No

¹¹⁴⁷ Information provided by multiple stakeholders February and May 2025.

¹¹⁴⁸ Article 13 TPR.

¹¹⁴⁹ PMM Circular 2019/1 on Cessation of Status of Syrians due to Voluntary Return, 7 January 2019.

¹¹⁵⁰ Information provided by a stakeholder, May 2023.

¹¹⁵¹ Provisional Article 1(6) TPR, as inserted by Article 1 Regulation 2016/8722 of 5 April 2016.

¹¹⁵² PMM, *Return statistics*, available [here](#)

The following categories of persons are excluded of benefitting from temporary protection in Türkiye:¹¹⁵³

- a. Persons for whom there is serious reason to believe that they have been guilty of acts defined in Article 1F of the 1951 Convention;
- b. Persons for whom there is serious reason to believe that they have engaged in acts of cruelty, for whatever rationale, prior to arrival in Türkiye;
- c. Persons who have either participated in or provoked crimes or acts referred to in 1 and 2 above;
- ç. Persons, who, having participated in armed conflict in country of origin, have not permanently ceased armed activities after arrival in Türkiye;
- d. Persons proven to have engaged, planned or participated in terrorist activities;
- e. Persons who have been convicted of a serious crime and therefore deemed to be presenting a threat against society; and those who are deemed to present danger to national security, public order and public security;
- f. Persons, who prior to their arrival in Türkiye, committed crimes that would be punishable with a prison sentence in Türkiye, and have left country of origin or residence in order to avoid punishment;
- g. Persons convicted of crimes against humanity by international courts;
- h. Persons who commit any of the crimes listed in Article 4(7) of the Turkish Criminal Code i.e. crimes related to state secrets and espionage.

Such cancellation is applied in practice for temporary protection holders designated as foreign terrorist fighters (YTS), for example, even where criminal proceedings have not led to a conviction.¹¹⁵⁴ In some cases, PMM has also ordered cancellation on the basis of Article 8(1)(e) TPR.¹¹⁵⁵ It has also been applied in cases of inconsistencies between the personal details in the Temporary Protection Identification Document and the passport of the refugee, which have been determined as provision of misleading information to PMM.¹¹⁵⁶

PMM is responsible and authorised to carry out and finalise the exclusion assessments and to communicate exclusion decisions to the persons concerned. Where it is identified that an existing beneficiary falls within the exclusion grounds listed above, their temporary protection status shall be cancelled. PMM can delegate this power to governorates as of 25 December 2019.¹¹⁵⁷

Nevertheless, given that the LFIP provides for a derogation from *non-refoulement*, temporary protection beneficiaries may also be subject to removal procedures without their status being cancelled.

Beneficiaries of temporary protection were not informed by the authorities of the cancellation of their protection in 2024 as in the previous year. They did not receive any written document providing the grounds for such cancellation; thus, preventing any possibilities to appeal. Most of them learned about the cancellation of their temporary protection when going to a PDMM for other reasons, such as updating data or when their General Health Insurance (GHI) was deactivated.¹¹⁵⁸ Stakeholders reported that temporary protection statuses are being cancelled for individuals involved in criminal cases, even when the incidents are minor. For example, in one case, an individual's temporary protection was cancelled, and a deportation order was issued solely for riding a motorcycle without a helmet. In another instance, three siblings who reported being physically assaulted were themselves issued deportation orders, and their temporary protection statuses were also cancelled. According to stakeholders, this trend is partly linked to an overly broad interpretation of the Ministry of Interior's internal circular on combatting irregular migration (Circular No. 2019/5). The relevant provision of the circular refers to "foreigners involved in criminal actions," but stakeholders argue that this clause has been applied excessively, even in cases involving minor infractions or incidents where the individual was the complainant. Individuals issued deportation orders on the grounds of "threat to public order" are frequently subjected to automatic cancellation of temporary protection without

¹¹⁵³ Article 8(1) TPR.

¹¹⁵⁴ Information provided by various stakeholders, May and June 2023.

¹¹⁵⁵ See e.g. Administrative Court of İzmir, Decision 2018/692, 29 November 2018, which quashed a cancellation decision on the basis that the conviction had not been established.

¹¹⁵⁶ Information provided by a stakeholder, May 2023.

¹¹⁵⁷ Article 12(2) TPR.

¹¹⁵⁸ Information provided by stakeholders, March – April 2024.

being officially notified. As a result, they may face three simultaneous administrative actions: a deportation order, an administrative detention order, and cancellation of temporary protection. While courts may issue positive decisions in clear-cut cases, the overall legal process often takes several years. If a restriction code is also imposed, the procedure can extend to five years. Stakeholders emphasized that the prolonged and burdensome nature of these procedures discourages individuals from pursuing legal remedies—an outcome that, in their view, may reflect the underlying political objective of the authorities.¹¹⁵⁹ According to a report, there have been instances in which women with infants were placed in removal centres and deported due to minor disputes and conflicts — such as arguments with neighbours — even in cases where no legal proceedings were initiated against them.¹¹⁶⁰

Address verification has been in place as from 2019 nationwide. If it is determined that the person is not in the province where they are registered, their registration is deactivated, but it is not cancelled. In 2022, the Ministry of Interior Affairs announced that 122,000 Syrians were not found at their registered address and 3,791,198 addresses got verified.¹¹⁶¹ It is legally impossible to deport many of the people, so PMM has difficulty imposing a sanction. If the Syrian applicant cannot be found at the specific address, their IDs can be cancelled which renders access to rights and services in Türkiye virtually impossible. Their IDs were reactivated when they went to PDMM, but those who could not go to PDMM lost their IDs. It is estimated by Syrian led NGOs and activists that 150 000 IDs have been cancelled as of April 2022.¹¹⁶² At the same time, it is difficult to get an appointment from the Syrian Embassy, and people have to pay. The number of temporary protection holders whose address were verified and updated was 986,852 in 2023 and 2,015,955 in 2022. However, in 2023, there was no data shared regarding the cancellation of registration. Between 1 January and 31 October 2024, a total of 731,146 individuals had unverified addresses. Among them, 580,819 individuals reactivated their addresses and were still undergoing the verification process, while 150,327 had not activated their address and had not accessed public services in the past year. No data was shared regarding the number of temporary protection status cancellations during this period.¹¹⁶³

In 2024, stakeholders observed that deactivation of temporary protection registration was used more frequently than outright cancellation. For instance, during address verification procedures, some individuals were asked to present notarized rental agreements. However, many landlords were unwilling or unable to visit notary offices—often due to being abroad—which prevented the completion of the activation process. In provinces affected by the earthquake, additional challenges arose. In some areas, address verifications could not be completed due to missing property numbering (*numarataj*). In Hatay, individuals residing in container cities experienced long delays in address verification, especially when the container settlements were located within closed neighborhoods. Outside the container areas, further problems were reported. For example, in districts like Reyhanlı—where the impact of the earthquake was minimal—registration is closed, meaning that even if individuals were able to find housing, they could not verify their addresses. Stakeholders noted a significant trend in Hatay: instead of processing cases individually, authorities appeared to implement mass deactivations of temporary protection statuses.¹¹⁶⁴

C. Access to temporary protection and registration

1. Admission to territory

Indicators: Admission to Territory

1. Are there any reports (NGO reports, media, testimonies, etc.) of people refused entry at the border and returned without examination of their protection needs? Yes No

¹¹⁵⁹ Information provided by a stakeholder April 2025.

¹¹⁶⁰ Mazlumder, Göç Politikasını Beraber İyileştirelim!, 20.06.2025, available [here](#).

¹¹⁶¹ Independent Turkey, İçişleri Bakan Yardımcısı Çataklı: Suriyeli mültecilerden 122 bini kayıp, 22 June 2022, available [here](#).

¹¹⁶² Rudaw, 'Algazi: The annulment of the identity of 150 thousand Syrians marks a change in policy', 20 April 2022, available [here](#).

¹¹⁶³ T.C. İstanbul İl Göç İdaresi Müdürlüğü, İçişleri Bakanı Ali Yerlikaya, Adres Tahkikatlarından Sonra Suriyelilerin Sayısının 2 Milyon 935 Bin 742'ye Düşüğünü Açıkladı, 20.11.2024, available [here](#).

¹¹⁶⁴ Information provided by multiple stakeholders March 2025.

While Article 6 TPR provides that all persons within the scope of the Regulation shall be protected from *refoulement*, the overall framework laid down by the TPR fails to explicitly guarantee the right of access Turkish territory for prospective beneficiaries. Persons approaching Türkiye's borders without a valid travel document may be admitted to territory within the discretion of the provincial Governorate.¹¹⁶⁵ Furthermore, either the Presidency has the discretion to order "limitations" or "suspension" of existing temporary protection measures in place "in the event of circumstances threatening national security, public order, public security and public health", including the possibility of the imposition of "additional measures concerning the mass movement of people both along Türkiye's borderline and beyond Türkiye's borderline".¹¹⁶⁶ This formulation appears to indicate that the Turkish Government may choose to seal Türkiye's borders to persons seeking temporary protection in Türkiye, either for a specific period or indefinitely, where considerations of national security, public order, public security and public health are deemed to require so.

The Turkish-Syrian land border has been restricted due to various restrictions. In 2018, Türkiye built a 764km concrete wall along the border, with cameras and lighting systems.¹¹⁶⁷ In 2019, Türkiye opened the "Olive Branch" border-crossing point in Afrin, reinforced with new technology.¹¹⁶⁸ In 2020, Türkiye began using surveillance balloons to patrol the border¹¹⁶⁹. The physical barrier has not completely stopped arrivals, although it has exacerbated difficulties in crossing the Turkish-Syrian border. Refugees have reportedly had to climb the border wall,¹¹⁷⁰ or to bribe border guards to enter Türkiye.¹¹⁷¹ There are also reports of tunnels and that the wall has increased smugglers' prices.¹¹⁷² PMM figures for 2024 refer to a total of 225,831 apprehended irregular migrants countrywide, of whom only 50,641 were Syrian nationals.¹¹⁷³

Allegations of pushbacks and violence along the Turkish-Syrian border persisted, although the rhetoric used by Turkish authorities changed in 2021. Despite the construction of a wall on the eastern border, some people managed to cross and enter Türkiye. When caught, they were pushed back, however the majority of attempts were labelled as "blocking" by Turkish police, rather than "pushing back." Applications for temporary protection are not accepted at the border.¹¹⁷⁴ In 2024, as in 2023, stakeholders in Hatay reported cases of unlawful deportations carried out under the label of "push-backs." Syrians without any form of registration were often returned irregularly to Syria without the initiation of any formal deportation procedures. In cases involving vulnerable individuals, such as a mother with a newborn child, police officers reportedly issued a written document instead of enforcing the return. One such document stated that, based on a decision by the Provincial Governor's Commission dated 24 February 2020, the individual was supposed to be subjected to a push-back procedure; however, given the recent childbirth, it was assessed that the return could not be carried out. The document advised the individual to approach the Provincial Directorate of Migration Management (PDMM) to initiate temporary protection registration. This document, stakeholders argue, indirectly confirms that police officers have been carrying out unlawful deportations under the guise of preventing entry to its territory—an action that constitutes a violation of both Turkish and international law.¹¹⁷⁵

Türkiye's handling of the situation and concerns for the human rights of migrants and refugees continued in 2024. These incidents are further described in [Access to the territory and pushbacks](#). Human Rights Watch,¹¹⁷⁶ claimed that the Turkish armed forces and gendarmerie, which are responsible for border

¹¹⁶⁵ Article 17(2) TPR.

¹¹⁶⁶ Article 15 TPR.

¹¹⁶⁷ Daily Sabah, 'Türkiye finishes construction of 764-km security wall on Syria border', 9 June 2018, available [here](#); Hürriyet, 'Türkiye improves border security with smart system', 6 January 2019, available [here](#).

¹¹⁶⁸ CNN Turk, 'Suriye sınırına akıllı güvenlik', 13 January 2020, available in Turkish [here](#) ; Hürriyet, 'Turkish surveillance balloon patrolling Syria border', 21 July 2020, available [here](#)

¹¹⁶⁹ Middle East Monitor, 'Türkiye to open border gate with Syria's Afrin next week – minister', 5 March 2019, available [here](#)

¹¹⁷⁰ Hürriyet, 'Footage shows Syrians scaling Turkish border wall with ladders', 7 September 2018, available [here](#)

¹¹⁷¹ International Crisis Group, *Mitigating Risks for Syrian Refugee Youth in Türkiye's Şanlıurfa*, February 2019, available [here](#), 5-6.

¹¹⁷² Information received from stakeholders from Ankara and Şanlıurfa, March 2020.

¹¹⁷³ PMM, *Irregular migration statistics*, available [here](#)

¹¹⁷⁴ Information provided by a stakeholder, June 2023.

¹¹⁷⁵ Information provided by multiple stakeholders March and May 2025.

¹¹⁷⁶ HRW, 'Türkiye'nin Sınır Görevlileri Suriyelileri Öldürüyor, Onlara İşkence Ediyor', 27.04.2023, available [here](#)

security, have been indiscriminately shooting and mistreating Syrians along the Syrian-Turkish border with providing details of two specific incidents happened in March 2023, and it has been failed to effectively prevent or investigate. Another claim is that in July 2023, up to 2,000 Syrians were returned to the northern Syria without any individual assessment regarding their health conditions, family ties etc., some of the deportees had been living in Türkiye for a number of years, and carried temporary protection ID cards.¹¹⁷⁷

2. Registration under temporary protection

The PDMM are formally in charge of registering temporary protection beneficiaries and referring them to cities.

Registrations are closed in many cities, except for some instances (family reunification, access to treatment, having a work permit, vulnerable groups). Another problem widely encountered is when the father of the family has temporary protection, but his wife and children arrive in Türkiye in irregular way, try to register in İstanbul but have difficulties in accessing registration.¹¹⁷⁸ The 20% rule or 'deconcentration policy'¹¹⁷⁹ affect cities with larger populations of Syrians such as Kilis where over 38% of the population is made up of Syrians under temporary protection.¹¹⁸⁰ However, the list of available cities changes according to capacity and if there is a health or education emergency, both groups of protection holders can be directed to other cities. İstanbul is closed to registration of both non-Syrians and Syrians except for justified reasons such as education, health or employment. However, İstanbul PDMM is reportedly not accepting registrations due to educational needs as it would mean registering the whole family which leads to an increase in numbers.¹¹⁸¹ In İstanbul, ten districts, Küçükçekmece, Bağcılar, Başakşehir, Avcılar, Bahçelievler, Sultangazi, Esenler, Zeytinburnu, Esenyurt and Fatih are closed to the new registration of foreigners.

A protection seeker can be referred to a temporary accommodation center for registration, or registered by PDMM if it falls under one of the following categories:

- If the applicant has a family member who is already registered under temporary protection and not obliged to stay at Temporary Accommodation Centres. This category would include the spouses with civil marriage, new-born babies, underage children and dependents of the individuals who are already registered under temporary protection and not obliged to stay at Temporary Accommodation Centres;
- If the applicant has travel restrictions due to medical conditions, and if the applicant has no self-care ability;
- If the applicant has a family member (spouses who can furnish a civil marriage certificate, children, dependents) of Turkish nationals and foreign nationals holding residence permit, work permit or registered under international protection;
- If the applicant is deemed not suitable to be accommodated in Temporary Accommodation Centres due to a specific need, and their spouses, children and dependents.

If the applicant has any substantiating document of the above-mentioned situations, they should provide the PDMM with the relevant supportive documents. The applicant is registered at the Temporary Accommodation Centres if they do not fall under these categories. At the Temporary Accommodation Center that they are referred to, the applicant is fingerprinted, and a security check is conducted. The applicant is required to stay at the Temporary Accommodation Centre during the procedure. The applicant is issued the Temporary Protection Identification Card after the security check. If the applicant cannot pass the security check, they are interviewed by the PDMM prior to any other action. PDMM issues a decision on an individual basis if the applicant is assessed to be excluded from temporary protection.¹¹⁸²

¹¹⁷⁷ Middle East eye, 'Hundreds of Syrians left in limbo after being deported from Turkey', 12.08.2023, available [here](#)

¹¹⁷⁸ Information provided by a stakeholder, April 2022.

¹¹⁷⁹ Turkish Government, Mahalle Kapatma Duyurusu Hk., available [here](#)

¹¹⁸⁰ See PMM website, 'Temporary Protection', available in English [here](#).

¹¹⁸¹ Information provided by a stakeholder, May 2023.

¹¹⁸² UNHCR, Registration with the Turkish authorities, available [here](#)

In 2024, registration of temporary protection continued with many challenges, and not in all cities. According to Ali Yerlikaya, no new temporary protection registrations have been granted since 2022. At the end of the year there were 2,901,478 people registered under temporary protection. As of 29.05.2025 there are 2,710,476 people registered under temporary protection.¹¹⁸³ This is a decrease of 504,304 compared to 2023, more than half million in 1.5 years and 825,422 compared to 2022, nearly a million. The reason for the decrease of temporary protection holders might be the individual exits, return, changes in their status (to different residence permits or gaining citizenship) and resettlement. The trend of forcing people to be undocumented might be another reason. However, due to the lack of data transparency, it is hard to give a clear answer. A growing number of Syrians are becoming undocumented in Türkiye, which has increased following the earthquakes in 2023. Stakeholders stated that the majority of individuals whose temporary protection status had been cancelled and who may have been returned to Syria eventually re-enter Türkiye and continue to reside without documentation. Therefore, the figures do not reflect a reduction in the actual number of Syrians in the country, but rather the number of Syrians who have access to public services¹¹⁸⁴.

After changes to the LFIP in December 2019, the law now foresees an administrative fine for those who provide accommodation to unregistered foreigners even unknowingly.

PMM collects biometric data, including fingerprints, during registration and maintains electronic files for each beneficiary in the agency's electronic file management system named "Göç-Net" – an internal database available to PMM staff to facilitate registration procedures.¹¹⁸⁵

2.1. Security checks and pre-registration

As discussed in [Eligibility](#), Article 8 TPR makes provisions for exclusion of persons from temporary protection, without however designating a procedure for the exclusion assessment. However, as Article 22 TPR instructs that persons who are determined to fall within the exclusion grounds shall not be issued a Temporary Protection Identification Card, it implies that the registration interview should also entail the exclusion screening of applicants.

In practice, this has been crystallised through a pre-registration phase prior to temporary protection registration introduced in March 2016. It aims to conduct security checks within 30 days. Syrians readmitted to Türkiye from Greece under the EU-Türkiye statement were also channelled through pre-registration. However, due to the high numbers of applicants, the lack of interpreters, and lengthy security checks, applicants face delays and difficulties in registration. Delays can lead to difficulties accessing healthcare and services, which require a Temporary Protection Identification Card and Foreigners Identification Number.¹¹⁸⁶

It should be noted, however, that certain categories of vulnerable groups are issued a Temporary Protection Identification Card without waiting for the 30-day period of pre-registration. This includes: (a) children aged 0-12; persons in need of urgent medical treatment; pregnant women; elderly persons; and unaccompanied children.¹¹⁸⁷ In practice, people with special needs such as persons with health conditions or women in advanced stages of pregnancy benefit from prioritisation in the registration procedure. However, in 2023, due to the lack of ID, after the child-birth some women faced high hospital fees they could not afford.¹¹⁸⁸ In 2024, stakeholders reported a widespread practice of new-borns remaining unregistered. In cases where the father had left the family—either voluntarily or involuntarily—without an official divorce procedure, PDMM offices began requiring either the father's presence or a relevant legal document in order to register the child. In the absence of such documentation, the child remained unregistered. Stakeholders noted that this requirement had not been observed in 2023, as single mothers had previously been able to register their new-borns without the father's involvement. However, this was no longer the case in 2024.

¹¹⁸³ See PMM website, 'Temporary Protection', available in English [here](#)

¹¹⁸⁴ Information provided by multiple stakeholders, March and April 2025.

¹¹⁸⁵ Turkish Government, Mahalle Kapatma Duyurusu Hk., available [here](#)

¹¹⁸⁶ Information provided by a stakeholder, May 2023.

¹¹⁸⁷ PMM Circular 2017/10 of 29 November 2017 on principles and procedures for foreigners under temporary protection.

¹¹⁸⁸ Information provided by stakeholders, March – April 2024.

Stakeholders emphasized that even unregistered infants were able to access mandatory vaccinations in 2024.¹¹⁸⁹

2.2. Completing registration before the PDMM

After the completion of the pre-registration phase, the applicant is required to appear before the PDMM within 30 days in order to obtain the Temporary Protection Identification Card. Failure to appear before the PDMM 15 days after the expiry of that 30-day time limit without a valid reason leads to the activation of a “V71” code on “unknown location” (*Semt-i meçhul*). The “V71” code suspends the registration procedure and can only be lifted after the PDMM confirms the continuation of the procedure or after search and apprehension records are registered in the database.¹¹⁹⁰

3. Appeal

Since the TPR itself does not have a dedicated provision listing specific remedies for persons concerned against negative decisions, all acts and actions of competent authorities within the scope of the TPR are subject to general rules of accountability derived from Turkish administrative law, unless there is a dedicated specific remedy provided in the LFIP itself.

As mentioned in [International Protection: Removal and Refoulement](#), there is a specific dedicated remedy provided by the LFIP against deportation decisions. According to Article 53 LFIP, deportation decisions can be challenged at competent Administrative Court within 7 days. Appeals against deportation decisions have automatic suspensive effect. The competent Administrative Court is required to finalise the appeal within 15 days. Administrative Court decisions on deportation appeals are final, may not be appealed onward in a higher court.

All other scenarios of possible unfavourable decisions and practices are subject to general rules of accountability derived from Turkish administrative law. Under Article 125 of the Turkish Constitution, all acts and actions of the administration are subject to judicial review. According to Article 7 of the Law on Administrative Court Procedures, acts and actions of the administration must be challenged within 60 days at competent administrative courts. Applications with the Administrative Court generally do not carry automatic suspensive effect, but applicants may file an associated halt of execution request, which may or may not be granted. There is no general time limit on Administrative Courts for the finalisation of the appeal. Unfavourable judgments of administrative courts can be challenged in the higher administrative court.

In 2024, the Istanbul 15th Administrative Court annulled the cancellation of temporary protection for an applicant whose status had been revoked following the issuance of a deportation order, which had itself already been annulled by the court. The court reasoned that since the deportation order—being the underlying action—was cancelled, the subsequent cancellation of the applicant’s temporary protection status lacked legal basis and was therefore unnecessary.¹¹⁹¹

In 2024 and 2025, both PDMMs and administrative courts increasingly began applying a 30-day time limit, rather than 60 days to challenge decisions related to the cancellation or rejection of temporary protection applications. This shift is based on Article 80 of the LFIP, which sets a 30-day deadline for appeals against “other” administrative actions. Stakeholders have observed that this shorter time limit is now often applied in cases involving re-applications for temporary protection or the reassessment of temporary protection status. In these cases, courts have started requiring appeals to be lodged within 30 days, even when a 60-day deadline was previously accepted. While the legal basis for this interpretation remains open to debate, lawyers and civil society actors note that it may create significant barriers to access to justice. For example, Istanbul 18th Administrative Court, rejected a Syrian applicant’s activation of temporary protection status solely on the grounds that the case was filed on 05.05.2025, exceeding the 30-day time limit following the rejection decision dated 06.03.2025.¹¹⁹²

¹¹⁸⁹ Information provided by multiple stakeholders, March 2025.

¹¹⁹⁰ *Ibid.*

¹¹⁹¹ T.C. İstanbul 15. İdare Mahkemesi, 2024/526 E., 2024/3653 K., 13.06.2024.

¹¹⁹² T.C. İstanbul 18. İdare Mahkemesi, 2025/1799 E., 2025/2156 K. 08.05.2025.

4. Legal assistance

Article 53 TPR guarantees the right to be represented by a lawyer in relation to matters of law and procedure vis-a-vis authorities. It also makes a reference to the provisions of state-funded legal aid (*Adli Yardım*) enshrined in the Law on Attorneys, which provides for state-funded legal assistance to persons who cannot afford to pay a lawyer.

In Türkiye, state-funded legal aid is delivered by bar associations, subject to considerations of “means” and “merits”. A project implemented by UNHCR and the Union of Bar Associations in Türkiye funds 45 bar associations specifically for international and temporary protection cases (see [International Protection: Regular Procedure: Legal Assistance](#)). A new LEAP Project, implemented by UNICEF and Union of Bar Associations in 14 provinces supports earthquake-affected children’s access to justice, and provides legal aid through mobile units, particularly reaching rural areas. This project becomes an important support especially for determination of paternity in case of lack of official birth certificates¹¹⁹³. Another partnership with the Union of Bar Associations is the one with UN Women to improve access to justice for women, not excluding refugee women, affected by earthquakes through field visits and workshops.

Another obstacle relates to the requirement of a notarised power of attorney (see [International Protection: Regular Procedure: Legal Assistance](#)). As per the Union of Notaries Circular 2016/3, the Temporary Protection Identification Document is included in the list of documents accepted by public notaries. However, some notaries remain reluctant to grant power of attorney on the basis of such documents.

Article 51 TPR guarantees persons concerned and their legal representatives’ access to file and documents, with the exception of “information and documents pertaining to national security, public order, protection of public security, prevention of crime and intelligence”. This excessively broad, blanket space of exception generates the risk that in certain situations lawyers representing persons seeking to challenge their treatment will be prevented from being able to access all relevant information. In the current regional context and security environment, with a heavy emphasis on the identification and prevention of persons with alleged links to terrorist groups, the restrictions allowed by Article 51 TPR on lawyers’ access to file is concerning. Article 51 TPR also provides guarantees for the confidentiality of personal information and documents.

Syrians might face some difficulties to access legal aid due to not being able to present necessary documents. The bar association first evaluate the financial situation, ask for documents like a poverty certificate from the mukhtar (neighbourhood authority) and examine if there are reasonable grounds to believe in a successful outcome for the legal assistance requested. Based on these evaluations, the bar association will decide whether to grant legal aid or not¹¹⁹⁴. The legal aid service did not look for a poverty certificate from the refugee applicant, but some courts did. If the applicant could not submit a poverty certificate issued by the mukhtar, the request was immediately rejected. Family and civil courts of the first instance have not accepted legal aid requests without this document. Even if the legal aid request was accepted, in cases where the client had to be heard before the court, the judge asked for a translator, and the client paid the translator fee. The legal aid budget should typically cover this cost.¹¹⁹⁵ In 2024, as explained above, bar associations were generally unwilling to provide legal aid services to foreigners, with only a few exceptions.

D. Detention in the temporary protection framework

As a rule, temporary protection beneficiaries should not be detained. The TPR does not feature any explicit provision governing administrative detention of persons within the scope of temporary protection laying down grounds and procedural safeguards that apply. Article 35 TPR does, however, provide that beneficiaries who fail to comply with the obligations set out in the Regulation may be temporarily or permanently prevented from residing outside a Temporary Accommodation Centre. Where this provision is applied, beneficiaries are forbidden from leaving the camp, thereby being *de facto* in a state of detention.

¹¹⁹³ Information provided by stakehodlers, March – April 2024.

¹¹⁹⁴ RRT & Refugee Solidarity Network, Information portal for refugee in Turkey, available [here](#)

¹¹⁹⁵ Information provided by a stakeholder, May 2022.

In addition, detention has also been – arbitrarily – imposed in some cases as a sanction against temporary protection beneficiaries who violate their obligation to stay in their assigned province, although practice in this regard is not uniform.

Temporary protection beneficiaries may be subject to detention for the purpose of removal (see [International Protection: Grounds for Detention](#)) where their status is cancelled or they fall within the exceptions to the principle of *non-refoulement* (see [Protection from Refoulement](#)).

Content of Temporary Protection

The temporary protection framework laid down by the TPR, first and foremost, provides a domestic legal status to beneficiaries granting legal stay in Türkiye;¹¹⁹⁶ protection from punishment for illegal entry or presence¹¹⁹⁷ and protection from *refoulement*.¹¹⁹⁸

The evolution of the debate about and policies for integrating Syrian refugees can be stated as follows: The first four years was an 'emergency period,' until the announcement of the EU-Türkiye statement in 2015. The time following 2016 was designated as the period of integration policies, implying that integration became a focal point of debate.¹¹⁹⁹ This period saw increased migration in Türkiye as a result of the expectation that the crisis would not be addressed quickly. Participation in educational possibilities, specific needs of women and children, child marriage, child labour, and problems of persons with chronic diseases, the disabled, and the elderly were the focus areas of this period. In this setting, protection has gained relevance, as has access to livelihood and the labour market. 2019 instead marked the start of a third period, focusing on social cohesion and returns.¹²⁰⁰ In 2019 PMM published the Cohesion Strategy and National Action Plan, which addressed six subject areas: social cohesion, information, education, health, labour market, and social support. As the five-year plan is due to end in 2023, UNHCR is collaborating with PMM on the drafting of its revised Strategy and National Action Plan.¹²⁰¹ In 2023, the policies overlooked social cohesion, instead the priorities were given to (voluntary) return, border management, effective detection of irregular migrants within the country, and deportation. As of December 2024, the main policy focuses on voluntarily, safe, dignified and regular returns.¹²⁰²

The rise of anti-immigrant sentiment was often targeting Syrians as the main refugee group in Türkiye. Türkiye's current economic crisis has resulted in immigrants' being made scapegoats and competitors in an increasingly narrowing labour market while their presence is seen as an unnecessary burden on the welfare state. Furthermore, rising anti-government sentiment has encouraged increased criticism of the government's open-door policy towards refugees.¹²⁰³ In 2023, the rising anti-migrant discourse led institutions interacting with migrants, particularly municipalities, to face pressures driven by fears of losing votes and negative citizen reactions¹²⁰⁴. This also resulted in reluctance among local companies to hire Syrians, landlords refusing to rent to Syrians or pressuring existing tenants to leave, and the removal of Arabic signs in some cities¹²⁰⁵. Following the earthquakes, false accusations against Syrians, such as looting and illegal border crossings, were widely disseminated by political leaders and on social media, intensifying hostility and calls for forced return.¹²⁰⁶ The anti-migrant discourse, fuelled by hate speech, damaged social cohesion. (See [Content of International Protection](#)).

In late June and early July 2024, a wave of anti-Syrian unrest broke out in Kayseri following allegations that a Syrian man had sexually abused a young Syrian girl¹²⁰⁷. According to the official statement of the Kayseri Governorship, the suspect was taken into custody and the child was placed under protection. However, stakeholders in Kayseri underlined that there was no clear or detailed information publicly shared about the incident, and the truth of the allegations remained uncertain. Some expressed concerns that the issue may

¹¹⁹⁶ Article 25 TPR.

¹¹⁹⁷ Article 5 TPR.

¹¹⁹⁸ Article 6 TPR.

¹¹⁹⁹ İçduygu, Ahmet and Simsek, Dogus (2016) Syrian refugees in Türkiye: towards integration policies. *Turkish Policy Quarterly*, 15(3), 59-69, available [here](#)

¹²⁰⁰ SGDD-ASAM and UN Women, *Needs assessment of Syrian women and girls under temporary protection status in Türkiye*, June 2018, available [here](#), 65.

¹²⁰¹ UNHCR, Türkiye Factsheet, September 2023, available [here](#).

¹²⁰² T.C. Göç İdaresi Başkanlığı, Gönüllü, Güvenli, Onurlu ve Düzenli Geri Dönüş

¹²⁰³ Evren Balta Ezgi Elçi Deniz Sert, Political Party Representation of Anti-Immigration Attitudes: The Case of Turkey, December 2022, available [here](#).

¹²⁰⁴ Heinrich Böll Stiftung, Göçmen Mahallelerinde Yaşam: Türkiye'de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı, November 2023, available [here](#).

¹²⁰⁵ Ibid, & information provided by stakeholders, March-April 2024.

¹²⁰⁶ Özdemir & Ağırday, Quakes Do Strike Refugees: Hyper-precarity of Syrians in Turkey, MiReKoc Working Paper Series, April 2023, available [here](#).

¹²⁰⁷ Euronews, Kayseri'de çocuk istismarı iddiası: Suriyelilerin iş yerleri hedef alındı; bir sığınmacı gözaltında, 01.07.2024, available [here](#).

have been suppressed or inadequately clarified by the authorities. Despite the uncertainty, the incident quickly escalated into widespread unrest, during which protestors raided the homes of Syrian families, set vehicles on fire, and engaged in acts of violence. Fourteen police officers and one firefighter were injured, and a broadcast ban was imposed concerning both the incident and the subsequent events. The Minister of Interior announced that 67 people had been detained in connection with the unrest, which continued into early July.

Stakeholders reported that the violence caused widespread fear among Syrians, many of whom refrained from leaving their homes for an extended period. Syrian residents reportedly tried to conceal vehicle license plates beginning with "MA" to avoid being targeted. The attacks led to extensive property damage and deepened feelings of insecurity among the Syrian community. Following the unrest, stakeholders observed that the PDMM in Kayseri initiated a practice of systematically collecting judicial records of all foreigners residing in the province. Based on these records—regardless of the nature or outcome of the proceedings—deportation decisions were issued, and entire families were taken to removal centers. Even in cases where only one family member had a judicial record, including records that ended in acquittal, non-prosecution, or suspension of the sentence, deportation measures were reportedly applied to the entire family. In many cases, stakeholders reported that temporary protection IDs were cancelled once individuals were taken to removal centers, triggering cascading rights deprivations. Affected persons, including children, infants, and other vulnerable individuals with no criminal background or public order risk, lost access to essential services such as education and healthcare. Their de-registration from the temporary protection system rendered them irregular migrants, increasing the risk of further detention or deportation. This situation created an atmosphere of fear and legal uncertainty. According to stakeholders, some Syrians—fearing they would be deported regardless of their actions—voluntarily approached PDMM offices and requested return to Syria. They reported that many of these requests were driven not by genuine willingness, but by feelings of insecurity and inevitability. Stakeholders also noted that the events had a silencing effect on the Syrian community across the region. Reports were received from nearby provinces as well, where similar patterns of fear and self-isolation among Syrians emerged. Many individuals reportedly began to believe that the authorities intended to remove them from the country and would find a justification to do so regardless of legal safeguards or personal circumstances.¹²⁰⁸

In early July 2024, human rights organizations including the Human Rights Association (İHD), the Association of Lawyers for Freedom (ÖHD), and the Contemporary Lawyers Association (ÇHD) conducted a field visit to Kayseri to document the impacts of anti-Syrian violence following the unrest that broke out in the city. Based on testimonies collected from affected residents, including Syrian shopkeepers and their families, the organizations documented extensive property damage, physical assaults, and threats targeting Syrians. According to interviews with a Syrian businessman, and his son, approximately 50 shops and dozens of vehicles were damaged or destroyed. Many Syrians fled the city for safety, either to Syria or to other Turkish provinces. They reported that the attacks included armed perpetrators and incidents involving Molotov cocktails thrown at homes. Another Syrian butcher confirmed that his shop was looted and burned, and although he possessed security footage, the police only took photographs and made no damage assessment. Stakeholders reported that the violence led to widespread fear, disruption of daily life, and a collapse in economic activity, particularly for Syrian-owned businesses. Many Syrians, especially those residing in districts like Eskişehir Bağları and Sahabiye, were unable to leave their homes or go to work. One Syrian woman testified that she had not been able to obtain essential medication for her mother or food for her family due to movement restrictions and the absence of support. Syrians described being targeted for speaking Arabic in public spaces, and noted that attackers coordinated their actions through social media, announcing planned assaults on specific neighborhoods. The lack of early intervention by law enforcement was a recurring concern; many victims stated that police officers did not intervene during the first two days of attacks and treated the assailants as if they were staging peaceful demonstrations.

The human rights delegation also highlighted systemic failures in the state's response. Authorities reportedly did not conduct damage assessments or provide information on compensation mechanisms. There were no clear measures to address Syrians' urgent needs such as food and medical access. Furthermore, no transparency was observed regarding the progress or effectiveness of criminal investigations into the perpetrators. A public statement by the Minister of Interior characterized the attackers as "disturbed, underage, or with criminal records," which stakeholders criticized as an attempt to

¹²⁰⁸ Information provided by multiple stakeholders, April 2025.

individualize the violence while ignoring the organized, xenophobic nature of the attacks. Concerns were raised that the real instigators may again benefit from impunity, as seen in previous incidents. The attacks had lasting consequences on the safety, dignity, and legal security of Syrians living in Kayseri. Testimonies revealed that many individuals began hiding their license plates, stopped commuting, or contemplated leaving the country altogether. Some sectors in the local economy were reportedly disrupted due to the inability of Syrian workers to reach their workplaces. Local media sources stated that several factories suspended production until at least 8 July. On 3 July, the monitoring team observed that major social media platforms were restricted, reportedly upon the request of security forces. Syrians interviewed during this period noted that the platform bans deepened their sense of fear and isolation, as they were unable to contact loved ones or access reliable information during the unrest.¹²⁰⁹

Following the unrest in Kayseri in late June and early July 2024, anti-Syrian sentiment quickly spread to other provinces, triggering coordinated acts of violence and intimidation. The combination of social media posts showing attacks on Turkish symbols in areas of northern Syria under Türkiye's control, alongside the alleged abuse incident in Kayseri, led to widespread protests marked by xenophobic slogans and targeted aggression against Syrians. According to media reports, violent demonstrations took place in Hatay (particularly in Reyhanlı and Kırıkhan), Adana, Bursa, Gaziantep, Şanlıurfa (Akçakale district), and again in Kayseri. Protesters attacked businesses and homes believed to be owned by Syrians, with chants such as "We don't want refugees" and "Suriyelileri istemiyoruz" reported across different cities. In Hatay's Reyhanlı district, large crowds gathered in front of the municipality building on the evening of 1 July, chanting anti-refugee slogans while waving Turkish flags. Security forces, including riot police and TOMA vehicles, were deployed and several streets near the municipality were closed to traffic. Demonstrators also targeted the Çarşamba Pazarı area, known for its concentration of Syrian-owned shops. As tensions escalated, many Syrian business owners shut down their stores and left the area to avoid confrontation. In Adana's Seyhan district, a group of individuals on motorcycles attempted to enter neighborhoods with significant Syrian populations, including Kocavezir and Mirzaçelebi, in a convoy formation. The group displayed Turkish flags and shouted anti-Syrian slogans while trying to stage a procession. Police forces intervened and blocked their entry into these neighborhoods but did not prevent the group from driving through other parts of the city while continuing their demonstrations.¹²¹⁰

An interesting report from March 2022 on urban refugees in Marmara¹²¹¹ gave the municipality view of integration in Türkiye. The report studied the situation for Syrian temporary protection holders in thirteen provinces and 94 municipalities and challenges. It found that the three most common problems that municipalities encounter regarding immigrants and refugees are the lack of a budget and legal problems arising from the limitations in the legislation related to their jurisdiction, a lack of data, and negative reactions from local people. The main problems experienced by Syrian temporary protection holders are poverty, being employed as unqualified, cheap labour and housing. Syrian refugees most often request help from municipalities with financial and other aid, employment and shelter.

A recent study¹²¹² reported the most challenging issues faced by Syrians are (1) movement restrictions that prevent them from relocating within the country, (2) difficulties in continuing to reside in their current homes due to increased demand for housing, high rent cost and financial insecurity (3) obtaining or renewing legal documentation, (4) disparities in aid distribution, and (5) experiencing hate speech and violence from police officers. In addition to those mentioned in both studies, the fear of return and having inactive identity cards forcing them to being undocumented hinders their access to services.¹²¹³

International NGOs have also been active in border provinces since the beginning of the Syrian conflict. Currently, the scope of foreign NGOs' activities is limited and under close monitoring by the competent

¹²⁰⁹ Suriyelilere Yönelik Kayseri'de Yaşanan İrkçi saldırılar Özel Raporu, 09.07.2024, available [here](#).

¹²¹⁰ Medyascope, Kayseri'de başlayan gerilim Suriye kaynaklı görüntülerle başka illere de sıçradı, 02.07.2024, available [here](#).

¹²¹¹ Marmara Municipalities Union, *Urban Refugees of Marmara: Process Management of Municipalities*, 9 March 2022. Summary of the report available in Turkish [here](#).

¹²¹² 11.11.11, Syrian refugees in Türkiye Community Perspectives on Basic Rights and Support, January 2024, available [here](#).

¹²¹³ Information provided by stakeholders, March – April 2024.

PDMM, as organisations need to obtain permission to operate in Türkiye and renew it regularly.¹²¹⁴ According to the list published and updated on 26 April 2023 by the Ministry of Interior Affairs, there are 60 registered INGOs operating in migration sector in Türkiye. This trend continued in 2024. Following December 2024, there was a noticeable increase in the number of NGOs and business representatives expressing interest in visiting Syria to explore potential activities. For instance, Refugees Association (Mülteciler Derneği) published a report based on their visit to Syria between 23 and 25 February 2025.¹²¹⁵

EU Funding Projects in Türkiye¹²¹⁶

The EU continued to support Türkiye's huge efforts to accommodate the largest refugee population in the world in 2023 despite political unrest. By the end of 2020, the EU Facility for Refugees in Türkiye (FRIT) had contracted its whole 6 billion EUR operational budget, and by August 2021, more than EUR 4.2 billion had been distributed. In addition to the 6 billion EUR already raised under the FRIT in 2020 and 2021, 585 million EUR from the EU budget was set aside for humanitarian assistance as well as to continue two significant cash support programmes for refugees. In June 2021, the Commission suggested allocating an additional 3 billion EUR in aid to Syrian refugees and host communities in Türkiye. But the size of the refugee population in Türkiye—particularly after the arrival of Afghan nationals starting in the summer of 2021—requires much more work from the international community to handle the growing requirements brought on by the refugees' prolonged stay in the nation.¹²¹⁷ For 2023 and 2024, the EU has pledged over 2 billion EUR in support for Syrian refugees and their host communities. It was stressed that the EU would continue to collaborate with Türkiye to ensure the delivery of cross-border aid to Syria.¹²¹⁸ As part of the MFF mid-term review package, the European Council on 1 February 2024 agreed to increase by 1.5 billion EUR the Solidarity and Emergency Aid Reserve for the period 2024-2027.¹²¹⁹

The sustainability of FRIT-funded projects varies. Infrastructure projects, such as schools and hospitals, have been integrated into the Turkish national systems, with operational costs covered by the national budget. However, socio-economic support projects have struggled with sustainability. While 15 community centres continued operations with alternative funding, social cohesion activities and vocational training ceased due to a lack of funds.

The earthquakes in February 2023 exacerbated challenges for refugees in Türkiye. Both the PIKTES and SIHHAT projects were significantly impacted by the earthquakes. Schools in the earthquake-affected provinces were closed; some were heavily damaged or destroyed and equipment and provisions were lost. In the case of SIHHAT, approximately 45 of the 102 (extended) migrant health centres were damaged. The Turkish Ministry of National Education did not provide data on Syrian children and children from host communities, which limited the audit's ability to assess the impact of FRIT education projects. With only 65% of Syrian pupils in formal education as of January 2023, integrating one million refugee children remains a significant challenge due to an insufficient number of teachers and schools. The Supporting Migrant Health Services in Türkiye (SIHHAT I) project identified the need for one migrant health unit per 4,000 refugees. However, 45 out of 102 migrant health centres were damaged in the earthquakes, disrupting healthcare services. Temporary units were established to mitigate the impact, and by December 2023, several centres had reopened. In 2024, seven new Migrant Health Centres and 45 new Migrant Health Units opened in 13 provinces.¹²²⁰

¹²¹⁴ For a list of active organisations, see Ministry of Interior, *Foreign CSOs permitted to operate in Türkiye*, available [here](#).

¹²¹⁵ Mülteciler Derneği, 2025 Saha Gözlem Raporu: Suriye “Esad gitti ama Suriye hala karanlık.”, 11.03.2025 available [here](#).

¹²¹⁶ This section is based on the information from several resources: DG NEAR EU Support to Refugees in Türkiye, available [here](#) & EC, Seventh Annual Report of the Facility for Refugees in Turkey, COM(2023) 543 final, 22.9.2023, Brussels & EUROPEAN COURT OF AUDITORS, Special report 06/2024: The Facility for Refugees in Turkey – Beneficial for refugees and host communities, but impact and sustainability not yet ensured

¹²¹⁷ ICMPD, ‘Migration Outlook 2022 Western Balkans & Turkey Nine migration issues to look out for in 2022’, 2022, available [here](#).

¹²¹⁸ AA, ‘EU pledges over \$2B at donors conference for Syria’, 15 June 2022, available [here](#).

¹²¹⁹ EC, Commission signs €400 million agreement with Türkiye to support its recovery after the 2023 earthquakes, 07.02.2024, available [here](#).

¹²²⁰ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 13, December 2024, available [here](#).

The EU delegation identified a need for an additional 632.4 million EUR to complete projects as planned. Prior to the earthquakes, 554 million EUR was already requested to cover inflation and increased construction costs. Post-earthquake, cash-assistance programs and agricultural employment support projects required further funding. The earthquakes also led to significant project delays, with 20 out of 33 ongoing FRIT projects needing extensions of 1 to 3 years.

In February 2024, the EU announced an additional 26 million EUR in humanitarian aid to support vulnerable refugees and earthquake-affected communities in Türkiye. This funding includes 4 million EUR earmarked for education in emergencies and aims to address critical needs such as water, sanitation, hygiene, and specialised healthcare services. The EU's continued support, in collaboration with Turkish authorities, underscores its commitment to assisting the most vulnerable populations based on their humanitarian needs. For basic needs, a further EUR 43.2 million was contracted to support recovery efforts, including providing emergency cash assistance.¹²²¹

The Facility has significantly contributed to infrastructure support, particularly in education and municipal services¹²²², resulting in the construction of 117 schools and the installation of 8,700 smartboards in primary and secondary schools. Additionally, the Facility has improved energy efficiency through solar panel installations on school rooftops. In municipal infrastructure, projects have enhanced essential services, including water supply, sanitation, and waste management, exemplified by the completion of a mechanical biological waste treatment facility in Gaziantep. These efforts have collectively improved the living conditions and service accessibility for both refugees and host communities.¹²²³ In terms of integration, Türk Kızılay runs 19 community centres for migrants in different locations across the country¹²²⁴.

It is hard to find a detailed breakdown of the funding, and the funded projects have not been designed by refugees nor, consulted to refugees to identify their priorities, there is a lack of refugees' meaningful involvement in project designs, and identifying the priorities for the communities.¹²²⁵ In 2024, the same trend of a decrease in funding for Türkiye as in 2023 was confirmed. This was due to the country's situation no longer being considered as a priority by several donors, given the several crises occurring worldwide.¹²²⁶ Funding from Directorate-General for Neighbourhood and Enlargement Negotiations and Directorate-General for European Civil Protection and Humanitarian Aid Operations for these services has significantly decreased, with humanitarian funding dropping from EUR 43 million in 2022 to EUR 13 million in 2024.¹²²⁷ Moreover, two significant developments—the regime change in Syria in December 2024 and executive decisions by the second-term Trump administration affecting USAID and PRM funding—led to a further decline in funding in 2025.

A. Status and residence

1. Protection from *refoulement*

Article 6 TPR guarantees protection from *refoulement* to persons granted temporary protection. However, an exception to this rule was introduced by way of emergency decree in October 2016, providing that a deportation decision “may be taken at any time during the international protection proceedings” against an applicant for reasons of: (i) leadership, membership or support of a terrorist organisation or a benefit-oriented criminal group; (ii) threat to public order or public health; or (iii) relation to terrorist organisations

¹²²¹ Ibid.

¹²²² EC, Seventh Annual Report of the Facility for Refugees in Turkey, COM(2023) 543 final, 22.9.2023, Brussels.

¹²²³ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 11, June 2023, available [here](#) EC, Seventh Annual Report of the Facility for Refugees in Turkey, COM(2023) 543 final, 22.9.2023, Brussels.

¹²²⁴ IOM, 'Göçmen ve Mülteci Destek Faaliyetleri', 2023, available [here](#)

¹²²⁵ Information provided by stakeholder, March – April 2024.

¹²²⁶ Information provided by stakeholder, March – April 2024.

¹²²⁷ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 13, December 2024, available [here](#).

defined by international institutions and organisations.¹²²⁸ The reform was consolidated by Law No 7070 on 1 February 2018. According to changes to the LFIP in December 2019, entry bans shall be applied to those who are in the country,¹²²⁹ and Syrians that are under temporary protection shall be deported if they do not comply with their notification duty three times consecutively.¹²³⁰

Since 2018, deportation decisions have been increasingly issued to registered Syrians based on the abovementioned provisions, similar to persons seeking international protection in Türkiye. Voluntary, safe, and dignified returns have continued to be a priority policy area for the PMM in 2023, which established its voluntary return programme in 2021. This process is less transparent, and it is unknown how many people are returning. Previous minister, Soylu stated that 554 thousand voluntary returns have been provided by May 2023, and the return of 1 million refugees in Türkiye will be ensured with the 240 thousand permanent houses to be built in northern Syria¹²³¹. The Minister of Interior Affairs, Yerlikaya, stated that the number of Syrian refugees who returned voluntarily from Türkiye to Syria reached 625,000 due to the normalisation of the life on the safe zone in Syria by February 2024¹²³². PMM mentioned in the Annual Report 2023 there was 30% increase in voluntary and safe returns¹²³³, and in July 2023 it was announced that the number of voluntary returns was 562 thousand.¹²³⁴

Stakeholders expressed concerns regarding whether they are voluntary or forced returns. According to Human Rights Watch,¹²³⁵ since 2017, thousands of Syrian refugees have been often coerced into signing “voluntary” return forms and deported to northern Syria, in July 2023 alone, Türkiye sent back over 1,700 Syrians into the Tel Abyad area. It is claimed that there were Syrians who were deported because they did not have an ID or they involved in a crime, but these people were able to come back to Türkiye through crossing border in irregular way.¹²³⁶ While there is no publicly available data on coercive 'voluntary' returns, stakeholders have noted that the practice continued in 2024.¹²³⁷ Although less cases than in the previous period were reported after December 2024, it persisted after authorities acknowledged that Syrians would not be returning to their country in large numbers.¹²³⁸ (See: Voluntariness of repatriation)

From the beginning of 2024 until 22 December 2024, the number of returnees reached 147,765, bringing the total number of returns to 763,443 since 2017. Following the regime change in Syria in December 2024, although detailed information for 2025 remains limited, data from the two-week period immediately after the change indicates that the five most common destinations were: Aleppo (11,392), Idlib (7,356), Latakia (1,539), Damascus (905), and Hama (823).¹²³⁹

The European Court of Human Rights found a violation of article 3, 5 and 13 of the ECHR in *Akkad v. Türkiye* judgement on the ground of expulsion of the temporary protection holder applicant to Syria.¹²⁴⁰ In the *Abdulkerim Hammud* decision (Application No. 2019/24388, Decision Date May 2, 2023)¹²⁴¹, the Constitutional Court of Türkiye examined, for the first time, an individual application alleging forced return

¹²²⁸ Article 54(2) LFIP, as amended by Article 36 Emergency Decree 676 of 29 October 2016. The provision cites Article 54(1)(b), (d) and (k) LFIP, the latter inserted by Emergency Decree 676.

¹²²⁹ Mülteci-Der, Joint Assessment: Proposed Amendments in the Law on Foreigners and International Protection of Türkiye, 4 December 2019, available [here](#)

¹²³⁰ Evrensel, 'Statü hakkı tanınmayan mülteciler yeni yaptırımlarla karşı karşıya', 25 December 2019, available in Turkish [here](#)

¹²³¹ AK PARTİ | Bakanımız Soylu "Gönüllü, Güvenli, Onurlu Geri Dönüş Projesi Temel Atma Töreni"nde konuştu 24-05-2023, available [here](#)

¹²³² AA, İçişleri Bakanı Yerlikaya: 625 bine yakın Suriyeli ülkesine geri dönüş kapsamında geçiş yaptı, 16.02.2024, available [here](#)

¹²³³ PMM, Faaliyet Raporu 2023, available [here](#)

¹²³⁴ Mülteciler Derneği, Türkiye'deki Suriyeli Sayısı Mayıs 2024, available [here](#)

¹²³⁵ HRW, "Everything is by the Power of the Weapon", 29 February 2024, available [here](#)

¹²³⁶ BBC Türkiye, Düzensiz göçmenlere yönelik kontroller arttı: 'Aylardır evden dışarı çıkmıyoruz', 19.12.2023, available [here](#) & Information provided by stakeholders, March-April 2024.

¹²³⁷ HRW, Submission by Human Rights Watch on Türkiye to the Human Rights Committee, 23.10.2024, available [here](#).

¹²³⁸ Information provided by multiple stakeholders, May 2025.

¹²³⁹ AA İçişleri Bakanı Ali Yerlikaya, AA Editör Masası'nda soruları yanıtladı.

¹²⁴⁰ HUDOC, *Akkad v. Türkiye* judgement available [here](#)

¹²⁴¹ Resmi Gazete, *Abdulkerim Hammud* decision (Application No. 2019/24388, Decision Date May 2, 2023), available [here](#).

to Syria. The Court unanimously ruled that there had been violations of the right to life and the prohibition of ill-treatment as protected under Article 17 of the Constitution, as well as the right to an effective remedy under Article 40, in parallel with the European Court of Human Rights decision in *Akkad v. Türkiye* (Application No. 1577/2019, Decision Date June 21, 2022¹²⁴²). The Court also ruled 50,000 TL in non-pecuniary damages for the applicant. The incidents in both the Hammud and Akkad cases are similar, involving Syrian applicants under temporary protection in Türkiye who were placed in administrative detention and allegedly forcibly returned to Syria based on a voluntary return form within a few days¹²⁴³.

The debate on the application of the safe third country concept does not fully encompass individuals under temporary protection, as they are not subject to a formal refugee status determination procedure. However, throughout 2024, administrative courts, while reviewing deportation orders, developed case law concerning the designation of safe third countries for Syrians. For more information on this case law see the section on the “The derogation from the non-refoulement principle”. For more information on the safe third country concept see the section on the [Safe third country](#).

2. Temporary protection identification document

The TPR provides a registration procedure and envisions the issuing of Temporary Protection Identification Documents (*Geçici Koruma Kimlik Belgesi*) to beneficiaries upon registration.¹²⁴⁴ This card serves as the document asserting the concerned person’s status as a beneficiary of temporary protection.

Article 25 TPR explicitly excludes temporary protection beneficiaries from the possibility of long-term legal integration in Türkiye. According to Article 25, the Temporary Protection Identification Document issued to beneficiaries does not serve as residence permit as such, may not lead to “long term residence permit” in Türkiye in accordance with Articles 42 and 43 LFIP.

Temporary Protection Identification Documents list a Foreigners Identification Number (YKN) assigned to each beneficiary by the Directorate General of Population and Citizenship Affairs. In Türkiye, all legally resident foreign nationals are assigned YKN which serve to facilitate their access to all government services. International protection applicants and status holders within the framework of LFIP are also given such YKN. Currently, YKN assigned to all categories of legally resident foreign nationals, including temporary protection beneficiaries, categorically start with the digits of 99.

A verification and update process of data of Syrians under temporary protection was completed at the end of 2018, in close cooperation with UNHCR.¹²⁴⁵ The process called ‘address verification,’ is about identifying whether the person is present in the province where they are registered. If not, their registration is deactivated, but not cancelled. UNHCR reported that 96% of the verification objective in Türkiye was met through this exercise.¹²⁴⁶ However, in April 2022, the PPM announced that Syrians who received an appointment for address verification online via Goc-Net or by calling 157 have to visit their registered PDDM within 45 days of receiving the SMS notification and update their personal information such as date of birth, marital status, and address. To change their address, the applicant must provide an electric or gas bill from their new residence. If the applicant does not have a registered address, they have to first register their address with the mayoralty and then visit their registered PDMM to verify their address. If a person needs or desires to reside in a city or neighbourhood other than their city of registration but was closed to registration due to deconcentration policy after February 2022, they can still be registered in one of these cities or neighbourhoods if they can submit a rental agreement or bill dated prior to February 2022; otherwise, they have to register in their city of registration.¹²⁴⁷ The number of temporary protection holders whose address verification took place was 986,852 in 2023 and 2,015,955 in 2022,¹²⁴⁸ and 1,877,269 in 2024.

¹²⁴² HUDOC, *Akkad v. Türkiye* judgement available [here](#)

¹²⁴³ Refugee Rights Turkey, RRT, Sığınma hukuk bülteni.

¹²⁴⁴ Article 2 TPR.

¹²⁴⁵ PMM, ‘Türkiye’de Geçici Koruma Kapsamında Bulunan Yabancıların Kişisel Verilerinin Doğrulanması’, 22 March 2018, available in Turkish [here](#)

¹²⁴⁶ UNHCR, *Türkiye: Operational Update 2018 Highlights*, available [here](#)

¹²⁴⁷ Hayata Destek Online, ‘Adres Kayıt ve Güncelleme İşlemleri Nasıl Yapılır?’, 12 April 2022, available [here](#)

¹²⁴⁸ PMM, Faaliyet Raporu 2023, available [here](#).

The Directorate of Migration Management announced that the travel permits of individuals under temporary protection who are in Istanbul but registered in a different province will not be extended as of September 24, 2023, except for those registered in the earthquakes affected zone and holding travel permit¹²⁴⁹. It was stated that those who are found to be in Istanbul “without legal right to stay here” will be taken to Temporary Accommodation Centres¹²⁵⁰. It is known that during police checks, people whose IDs were registered in another province were sent to the removal centres or temporary accommodation centres and from there they were sent to the cities where their IDs were registered.¹²⁵¹ According to stakeholders, travel permits were routinely renewed until October 2023; however, after that point, officials adopted a stricter stance, renewing permits only for individuals with severe illnesses. Changes in the province of residence became rare.¹²⁵²

In 2019, it was stated that Syrians would be deported if they failed to go to the provinces where they were registered. However, it was legally impossible to deport many of the people, so PMM had difficulty imposing a sanction. Plus, it is difficult to prove that administrative detainees were coerced into returning voluntarily, despite their claims.¹²⁵³ Forms for voluntary return have to be signed under the supervision of the Red Crescent and UNHCR, but in the majority of cases, this is not the case. If the Syrian applicant cannot be located at the specified address, their identification documents may be revoked. When they visit PDMM, their IDs get reactivated, but those who were unable to visit PDMM lose their IDs. In some cases, they are not aware that their IDs are not active. Syrian-led NGOs and activists estimate that 150,000 IDs have been revoked as of April 2022.¹²⁵⁴ Stakeholders expressed concern that official return statistics may reflect individuals whose identification documents have been revoked, rather than those who have actually departed. As a result, many Syrians remain in Türkiye without being reflected in official data, either waiting for an opportunity to regularize their status or attempting to reactivate it.

3. Naturalisation

As discussed in [International Protection: Naturalisation](#), citizenship may be granted through: (a) the normal procedure, following 5 years of residence; (b) marriage to a Turkish citizen; (c) having a Turkish descent; (d) adoption; or (e) the exceptional circumstances procedure.

Time spent in Türkiye under a Temporary Protection Identification Document may not be interpreted to count towards the fulfilment of the requirement of 5 years uninterrupted legal residence as a precondition in applications for Turkish citizenship. Temporary protection beneficiaries who arrived after 2011 can only access naturalisation through marriage to a Turkish citizen or through the exceptional circumstances procedure. Citizenship under exceptional circumstances is granted on the basis of certain profiles and criteria such as skills which could contribute to Türkiye. Generally, in practice citizenship is granted to highly qualified Syrians, having work permit or studying in a university, although other categories can also obtain it.¹²⁵⁵ The process to acquire citizenship is not clear.

The Ministry of Interior stated on 19 December 2022 that there were 223,881 naturalised Syrians in Türkiye and on 15 April 2023 that 130,914 of them would vote in the 2023 elections.¹²⁵⁶ This number was previously announced as 120,133 on 19 August 2022.¹²⁵⁷ As of August 2024, 238,768 Syrian nationals under

¹²⁴⁹ T.C. İstanbul Valiliği, İstanbul İlinde İkamet Eden Geçici Koruma Kapsamındaki Suriye Uyraklı Yabancıların Kayıtlı Oldukları İllere Dönmeleri Hakkında Duyuru, 28.07.2023.

¹²⁵⁰ PMM, İstanbul'da Bulunan Geçici Koruma Kapsamındaki Suriye Uyraklı Yabancıların Kayıtlı Oldukları İllere Dönmeleri Hakkında Duyuru, 21.09.2023

¹²⁵¹ BBC Türkiye, Düzensiz göçmenlere yönelik kontroller arttı: 'Aylardır evden dışarı çıkmıyoruz', 19.12.2023, available [here](#) & Information provided by stakeholders, March-April 2024.

¹²⁵² Information provided by a stakeholder, March 2025.

¹²⁵³ Information from a stakeholder, April 2022.

¹²⁵⁴ Ömer Sönmez, 'Algazi: The annulment of the identity of 150 thousand Syrians marks a change in policy', *Rudaw*, 28 April 2022. Available in Turkish [here](#)

¹²⁵⁵ Information provided by various stakeholders, May and June 2023.

¹²⁵⁶ Multeciler, Türkiye'deki Suriyel Sayısı, 20 June 2023, available [here](#)

¹²⁵⁷ Obianet, 'News List', 2023, available [here](#).

temporary protection have exceptionally acquired Turkish citizenship,¹²⁵⁸ 104,144 of them over age of 18. Since June 2023, a total of 183 Syrian nationals have acquired Turkish citizenship, including 101 adults and 82 children.¹²⁵⁹

The legal status of children born in Türkiye has been extensively debated. As of July 2023, it was reported that 754,000 children born in Türkiye¹²⁶⁰. There are no available statistics on the number of non-Syrian children.¹²⁶¹ Türkiye is not a party to the 1961 Convention on the Reduction of Statelessness or the 1997 European Convention on Nationality. Stakeholders have expressed concerns that Türkiye does not currently provide these children unconditional birth-right citizenship and that the Regulation on Temporary Protection does not include time spent in Türkiye under temporary protection towards the five years' uninterrupted legal residence as a precondition for applications for Turkish citizenship by naturalisation. In addition, nationality legislation in Syria does not guarantee women the right to transmit their Syrian nationality to their children. This with the loss of documentation due to the Syrian conflict; and the lack of birth-right citizenship in Türkiye combine to deny the children's right to a nationality and create the risk of statelessness for children born to Syrian refugees in Türkiye.¹²⁶²

Despite the difficulties, more new-born Syrians become Turkish citizens every year. As of December 2023, 100,633 children had been granted Turkish citizenship.¹²⁶³

B. Family reunification

Article 49 TPR appears to grant temporary protection beneficiaries the possibility of “making a request” for family reunification in Türkiye with family members outside Türkiye. While the article provides that PMM shall “evaluate such requests”, the wording of this provision does not indicate strictly a right to family reunification for beneficiaries. It is rather worded as a possibility subject to the discretion of PMM.

According to Article 3 TPR, a beneficiary's spouse, minor children and dependent adult children are defined as family members. The article also provides that in the case of unaccompanied children, “family unification steps shall be initiated without delay without the need for the child to make a request”.

In practice, Türk Kızılay is the main actor working on family reunification applications, especially reunification of children with their families in Türkiye, while AFAD manages family reunification requests in the border regions. According to Türk Kızılay, it had received 110 requests for family reunification as of December 2022, but only 9 instances were satisfactorily handled. They also provide family tracing and messaging services. Only 8 of 238 family tracing requests were met, and only 33 of 119 family messaging requests were delivered successfully.¹²⁶⁴ No data was made available for 2023 and 2024.

The same exit permission requirement also applies to temporary protection beneficiaries in the process of departing from Türkiye for the purpose of family reunification with family members in third countries. Syrians seeking a family reunification departure from Türkiye must first register with PMM as a temporary protection beneficiary before they can subsequently request and obtain an “exit permission” to leave Türkiye to a third country.¹²⁶⁵ IOM supports more than 20 countries including USA, Canada and EU countries in these efforts.¹²⁶⁶ In Türkiye, many refugees want to reunite with family members in Europe. IOM conducts family reunification interviews. Often a Syrian family has some members in Germany, with other family members

¹²⁵⁸ T.C. İletişim Başkanlığı, Türkiye’de bulunan yabancıların sayısı ve vatandaşlık durumları ile ilgili iddialara dair açıklama, 21.08.2024, available [here](#).

¹²⁵⁹ Anka, Nüfus ve Vatandaşlık İşleri Genel Müdürlüğü: Türk vatandaşlığı kazanan Suriye uyruklu kişi sayısı 238 bin 768, 21.08.2024, available [here](#).

¹²⁶⁰ BSHA, Bakan Koca, “754 Bin Suriyeli Bebeğimiz Dünyaya Geldi”, 7.7.2023, available [here](#).

¹²⁶¹ Obianet, ‘News List’, 2023, available [here](#).

¹²⁶² Institute on Statelessness and Inclusion and the European Network on Statelessness, *Joint Submission to the Human Rights Council at the 35th Session of the Universal Periodic Review, (Third Cycle, January 2020), Türkiye*, July 2019 page 6, available [here](#).

¹²⁶³ DW, İçişleri Bakanı: 238 bin 55 Suriyeli Türk vatandaşı oldu, 17.12.2023.

¹²⁶⁴ Information provided by Türk Kızılay, June 2023.

¹²⁶⁵ UNHCR, ‘Üçüncü Ülkeye Yerleştirme’, last accessed 13 July 2022, available [here](#).

¹²⁶⁶ IOM, ‘Yeniden yerleştirme’, 2023, available [here](#)

in neighbouring countries such as Lebanon and Türkiye. In case of reunification with a family member who resides in Germany, family members apply for a family reunification visa through the German Consulates.

C. Movement and mobility

1. Freedom of movement

Indicators: Freedom of Movement

1. Is there a mechanism for the dispersal of beneficiaries across the territory of the country?
 Yes No
2. Does the law provide for restrictions on freedom of movement?
 Yes No

The temporary protection declaration decision of the Presidency may contain the implementation of temporary protection measures to a specific region within Türkiye as opposed to countrywide implementation.¹²⁶⁷ The Presidency has the authority to order limitations on temporary protection measures in place, or the suspension of existing measures for a specific period or indefinitely, “in the event of circumstances threatening national security, public order, public security and public health”.¹²⁶⁸

Article 33 TPR also provides that temporary protection beneficiaries are “obliged to comply with administrative requirements, failure of which will result in administrative sanctions”. Among other requirements, they may be “obliged to reside in the assigned province, temporary accommodation centre or other location” and comply with “reporting requirements as determined by provincial Governorates”. This provision clearly authorises PMM to limit freedom of movement of temporary protection beneficiaries to a particular province, a particular camp or another location.

Since August 2015, the Turkish government imposed controls on the movement of Syrians within Türkiye. Stricter restrictions were enforced for temporary protection beneficiaries after an EU-Türkiye statement. Failure to comply with reporting obligations could lead to the withdrawal of temporary protection status and the issuance of a “V71” code indicating an unknown location.

Beneficiaries may request a travel authorisation document in order to travel outside the province in which they are registered. The document is issued at the discretion of the competent Governorate and may not exceed 90 days in duration, subject to a possible extension for another 15 days. The beneficiary is required to notify the Governorate upon return to the province. Failure to do so after the expiry of the 90-day period leads to a “V71” code, as a result of which the person’s status is considered to be implicitly withdrawn. The “V71” code is deactivated if the person approaches the PDMM with valid justification, following an assessment of the case.

Movements of temporary protection beneficiaries seem to continue, nevertheless. PMM statistics on apprehensions for irregular migration do not discern irregular entries from irregular exits from Türkiye, yet indicate that the majority of apprehensions occur in western and southern provinces. By the end of 2023 around 58,621 Syrians accounted of the total number of 254,008 apprehensions across the country. The number increased in 2023, more than doubled when compared to 2021. Throughout 2024, 50,641 Syrians were apprehended due to their irregular status in the country and 8,261 had been apprehended by 29 May 2025.¹²⁶⁹

Temporary protection beneficiaries may also move between provinces *inter alia* to seek employment. To reduce informal employment, the Ministry of Family and Social Services has provided employers with the possibility to make one official declaration before a public notary that a beneficiary is starting employment, in order for that beneficiary to transfer their place of residence within 30 days. However, due to obstacles in obtaining a work permit (see Access to the Labour Market), and to the fact that employers do not actively

¹²⁶⁷ Article 10(1)(ç) TPR.

¹²⁶⁸ Article 15(1) TPR.

¹²⁶⁹ PMM, *Irregular migration statistics*, available [here](#)

make the necessary official declarations, they are not able to change their address. In addition, work permits were previously considered a valid reason for address changes; however, after 2022, address changes based on work permits became nearly impossible in cities closed to registration.¹²⁷⁰ In 2023, 986,852 Syrians' addresses were verified. As of 31 October 2024, the addresses of 731,146 Syrians are not up to date. Of these, 580,819 have either updated their address or are in the process of doing so, while 150,327 have not updated their address and have not been able to access public services in the past year.¹²⁷¹

In early 2022, it was formalized in the “20% rule”, whereby from May 2022 it is against the law for any region or area in Türkiye to have a population of foreign nationals that is more than one-quarter of the total population. This includes both people who have made Türkiye their permanent home and those who are merely visiting the country. As of August 2024¹²⁷², 1,169 neighbourhoods in 63 provinces were closed to foreign nationals seeking address registrations for temporary protection, international protection, and residence permits, as well as changes to their city of residence if they are foreign nationals with residence permits or are under temporary or international protection, with the exception of new-borns and instances of nuclear family reunification. In 2024 this continued. **Aydın, Antalya, Ankara, Bursa, Çanakkale, Düzce, Edirne, Hatay, İstanbul, İzmir, Kırklareli, Kocaeli, Muğla, Sakarya, Tekirdağ and Yalova** are some of the cities that fall into this category.¹²⁷³

2. Travel documents

Article 43 TPR provides that if temporary protection beneficiaries make a request for a travel document, these requests “shall be evaluated” in the framework of Article 18 of the Passport Law. As described in [International Protection: Travel Documents](#), Article 18 of the Passport Law envisions the two types of “passport with a foreign-nationals-only stamp” (*Yabancılara Mahsus Damgalı Pasaport*) with different durations of validity. Therefore, the current temporary protection framework does not foresee the provision of (Refugee) Travel Documents to temporary protection beneficiaries within the meaning of the 1951 Convention.

Stakeholders are not aware of any such “passports with a foreign-nationals-only stamp” issued to a temporary protection beneficiary. That being said, there are cases of temporary protection beneficiaries being allowed to travel on their Syrian passports to third countries for private purposes, although in some cases these individuals encounter difficulties in entering Türkiye upon return.¹²⁷⁴

In 2022, Ministry of Interior Affairs issued a circular to PDMs regarding the imposition of a new duty on taxi drivers to check the travel permits of foreigners when transporting passengers between cities. The taxi driver would otherwise be accused of human trafficking.¹²⁷⁵ In 2024, like in 2023, no information regarding the implementation of this rule was available.

During the road checks of the gendarmerie teams in Gaziantep, 339 foreign nationals traveling between cities without a road permit were identified, and a total administrative fine of 2 million 178 thousand TL was imposed on these people¹²⁷⁶.

Even though it was not free from challenges, Syrians who temporarily moved from earthquakes-affected region to other parts of Türkiye were able to obtain and extend their travel permits during their stay. With this permit, they were allowed to access services and rights such as education and healthcare. There were also 90-day extensions on their permits, and no restrictions were imposed if they wanted to return to their

¹²⁷⁰ Hayata Destek Online, ‘Adres Kayıt ve Güncelleme İşlemleri Nasıl Yapılır?’, 12 April 2022, available [here](#).

¹²⁷¹ T.C. İçişleri Bakanlığı, Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya, Adres Tahkikatlarından Sonra Suriyelilerin Sayısının 2 Milyon 935 Bin 742’ye Düşüğünü Açıkladı, 20.11.2024, available [here](#).

¹²⁷² PMM, ‘İstanbul’da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı’ İddialarına İlişkin Basın Açıklaması, 16.07.2023, available [here](#); BBC Türkçe, Kayıtlı olduğu adreste bulunamayan 729 bin Suriyeli, kaydını güncellemezse ne olacak?, 09.08.2024, available [here](#).

¹²⁷³ Mülteciler Derneği, ‘Türkiye’deki Suriyeli Sayısı Haziran 2023’, 2023, available [here](#).

¹²⁷⁴ Information provided by a stakeholder, May 2023.

¹²⁷⁵ AA, ‘İçişleri Bakanı Soylu: Taksicilere yabancı yolcuların il dışı seyahat izin belgelerini kontrol yükümlülüğü getiriyoruz’, 2022, available in Turkish [here](#).

¹²⁷⁶ İzinsiz yolculuk yapan yabancılara 2 milyon 178 bin lira ceza - Son Dakika Haberleri, available [here](#) 20 03 2024

provinces¹²⁷⁷. It is thought that approximately 200,000 people who temporarily moved to different provinces after the earthquake, but some of them returned after a while.¹²⁷⁸ For example, there were those who returned to Hatay despite the serious destruction in the city.

3. Resettlement and family reunification departures

3.1. The general procedure

PMM pre-identifies cases for resettlement consideration among the registered temporary protection caseload through the PDMM and makes referrals to UNHCR in lists. When UNHCR identifies the applicants most in need of resettlement from these lists, it presents them to third countries. The final decision is taken by the third countries. They examine the files and decide whether to accept the relevant applicants, especially after conducting security checks. IOM organises the implementation of health checks, the preparation of travel documents and the cultural orientation of those accepted for resettlement.¹²⁷⁹

As of 2021, PMM and European Union Agency for Asylum (EUAA) has started to work together in terms of resettlement to the EU countries and to improve the resettlement referral mechanisms of PMM under the roadmap for cooperation.¹²⁸⁰ The Roadmap on strengthening the asylum and reception systems in line with the Common European Asylum System and EU standards had been implemented for a period of 24 months between 1 January 2022 and 31 December 2023.¹²⁸¹ The EUAA's collaboration to create a one-stop shop for the resettlement processes by providing logistical support to EU member states and some associated countries started during 2019-2021 with a pilot phase, supporting 8 countries, this support continues under a more structured way starting from mid-2021 for 4 years period, providing logistical supports on medical checks, transportation, interpretation etc. There is ongoing work to relaunch the contact for another 4 years, after mid-2025¹²⁸².

Departure of temporary protection beneficiaries to third countries for the purpose of resettlement is subject to the permission of PMM.¹²⁸³ A so-called "exit permission" must be issued in order for a beneficiary to be allowed to exit Türkiye to a third country either for the purpose of a temporary visit or on a permanent basis for the purpose of resettlement. There have been no issues regarding neither the exit permits nor travel permits, PMM was collaborative¹²⁸⁴.

In practice, however, certain profiles of temporary protection beneficiaries are issued a "V91" code referring to "temporary protection holders in need of exit permission" (*Ülkeden Çıkışı İzne Tabi Geçici Koruma Kapsamındaki Yabancı*) and which prevent them from exiting Türkiye. "V91" codes are usually issued to highly qualified Syrians.

According to PMM statistics, a total of 72,113 Syrians had been transferred to third countries between 2016 and May 2025, mainly to Canada, the US, Germany, France and Netherlands.¹²⁸⁵

3.2. The 1:1 resettlement scheme

The EU-Türkiye statement of 18 March 2016 established a specific resettlement procedure ("1:1 scheme"), under which one Syrian national would be resettled from Türkiye to the EU Member States for each Syrian national returned from Greece to Türkiye, taking into account the UN vulnerability criteria.¹²⁸⁶ Since 2021, the European Union Agency for Asylum (EUAA) has collaborated with PMM to facilitate resettlement in EU

¹²⁷⁷ Information provided by stakeholders, March - April 2024.

¹²⁷⁸ Information provided by a stakeholder, March 2024.

¹²⁷⁹ IOM, 'Yeniden yerleştirme', 2023, available [here](#)

¹²⁸⁰ Information provided by a stakeholder, June 2023.

¹²⁸¹ Roadmap for Cooperation between the EUAA-PMM (2022-2023) Strengthening the asylum and reception systems in line with the Common European Asylum System and EU standards, available [here](#)

¹²⁸² Information provided by a stakeholder, April 2024.

¹²⁸³ Article 44 TPR.

¹²⁸⁴ Information provided stakeholders, March & May 2024.

¹²⁸⁵ PMM, *Temporary protection*, available [here](#).

¹²⁸⁶ Council of the European Union, *EU-Türkiye statement*, 18 March 2016, para 2.

member states. Selection missions from member states that handle selection processes, conduct cultural interviews, and pre-departure orientation training. The International Catholic Migration Commission (ICMC) Resettlement Support Center in İstanbul provides logistical support to the selection missions. However, certain countries in the EU, such as Germany, manage the entire resettlement process on their own. The German consulate in Istanbul is solely responsible for the resettlement procedure.¹²⁸⁷

As of December 2023, there are 39,647 persons that have been resettled under this “1:1 scheme”, with primary resettlement destinations being Germany, France, the Netherlands, and Sweden.¹²⁸⁸

As of March 2024, the following numbers of refugees had been resettled to the EU under the 1:1 scheme:

Resettlement of Syrian refugees under 1:1 scheme	
Country of destination	Number of resettled persons
Germany	18,114
Canada	12,980
U.S.A.	6,559
France	6,229
Netherlands	5,523
Sweden	3,174
Finland	2,880
United Kingdom	2,721
Belgium	1,877
Norway	1,724
Spain	1,213
Australia	501
Portugal	463
Italy	399
Romania	254
Croatia	250
Switzerland	220
Austria	219
Luxembourg	206
Lithuania	102
Bulgaria	94
Estonia	59
Slovenia	57
Latvia	46
Denmark	31
Malta	17
New Zealand	15
Total	65,927

Source: IOM, Migrants’ Presence Monitoring Situation Report, April 2024.

In 2024, around 13 EU countries are expected to be a part of the resettlement efforts, including Belgium, the Netherlands, Slovenia, Italy, Finland, France, Norway, and Ireland.¹²⁸⁹ In 2023, Syrians from earthquake-affected locations were prioritized for resettlement interviews. 94% of the resettlement submissions made by UNHCR in 2023 were from the earthquake-affected region.¹²⁹⁰ (For more details, see [Content of International Protection: Resettlement](#))

¹²⁸⁷ Information provided by a stakeholder, June 2023.

¹²⁸⁸ IOM, Migrants’ Presence Monitoring Situation Report, December 2023

¹²⁸⁹ Information shared by stakeholders, March - April 2024.

¹²⁹⁰ UNHCR Türkiye bi-annual fact sheet, February 2024, available [here](#)

D. Housing

Indicators: Housing

1. For how long are beneficiaries entitled to stay in camps?	Not regulated
2. Number of beneficiaries staying in camps	59,796

1. Temporary Accommodation Centres

The TPR does not provide a right to government-provided shelter as such for temporary protection beneficiaries. However, Article 37(1) TPR, as amended in 2018, authorises PMM to build camps to accommodate temporary protection beneficiaries.¹²⁹¹ These camps are officially referred to as Temporary Accommodation Centres.¹²⁹² A further amendment to the LFIP in 2018 sets out provisions on the financing of camps set up by PMM.¹²⁹³

Articles 23 and 24 TPR authorise PMM to determine whether a temporary protection beneficiary shall be referred to one of the existing camps or allowed to reside outside the camps on their own means in a province determined by the Ministry of Interior Affairs. Amended Article 24 TPR authorises PMM to allow temporary protection beneficiaries to reside outside the camp in provinces to be determined by the Ministry of Interior Affairs.¹²⁹⁴ It also commits that out of temporary protection beneficiaries living outside the camps, those who are in financial need may be accommodated in other facilities identified by the Governorate.

As of 2024, nine large-scale camps are accommodating a total of 59,796 temporary protection beneficiaries, spread across five provinces in Southern Türkiye (Hatay, Kahramanmaraş, Adana, Malatya, Osmaniye and Şanlıurfa) in the larger Syria border region.¹²⁹⁵ In 2024, camp-specific figures were not published; however, according to IOM, the number of Syrians residing in camps decreased by 4,085 between December 2023 and March 2024.

The policy applied by the Turkish government to new arrivals from Syria changed as of 6 June 2022; since then, a protection seeker can be referred to a temporary accommodation center for registration, or registered by PDMM if it falls under one of the following categories:

- If the applicant has a family member who is already registered under temporary protection and not obliged to stay at Temporary Accommodation Centres. This category would include the spouses with civil marriage, new-born babies, underage children and dependents of the individuals who are already registered under temporary protection and not obliged to stay at Temporary Accommodation Centres.
- If the applicant has travel restrictions due to medical conditions, and if the applicant has no self-care ability,
- If the applicant has a family member (spouses who can furnish a civil marriage certificate, children, dependents) of Turkish nationals and foreign nationals holding residence permit, work permit or registered under international protection,
- If the applicant is deemed not suitable to be accommodated in Temporary Accommodation Centres due to a specific need, and their spouses, children and dependents.

If the applicant has any substantiating document of the above-mentioned situations, they should provide the PDMM with the relevant supportive documents. The applicant is registered at the Temporary Accommodation Centres if they do not fall under these categories. At the Temporary Accommodation Center that they are referred to, the applicant is fingerprinted, and a security check is conducted. The applicant is required to stay at the Temporary Accommodation Centre during the procedure. The applicant is issued the Temporary Protection Identification Card after the security check. If the applicant cannot pass the security check, they are interviewed by the PDMM prior to any other action.

¹²⁹¹ Article 37(3) TPR, as amended by Regulation 2018/11208.

¹²⁹² Article 3 TPR.

¹²⁹³ Article 121A LFIP, inserted by Article 71(e) Decree 703 of 9 July 2018.

¹²⁹⁴ Article 24 as amended by Regulation 2019/30989.

¹²⁹⁵ IOM Quarterly Report: Migrant Presence Monitoring Türkiye, Overview of the Situation with Migrants, 2023, available [here](#).

PDMM issues a decision on an individual basis if the applicant is assessed to be excluded from temporary protection.¹²⁹⁶

By the end of 2023 less than 2% of Syrians lived in camps: **Adana** (Sarıçam), **Hatay** (Apaydın, Yayladağı, Altınözü), **Kahramanmaraş** (Merkez), **Kilis** (Elbeyli), **Osmaniye** (Cevdetiye), **Gazinatep** (Nizip), Malatya (Beydağı) and Şanlıurfa (Harran).¹²⁹⁷ In 2024, the numbers were not publicly shared. In 2024, PMM stated their intent to change the function of TACs in multiple documents. While the aim is not explicitly stated, some stakeholders noted that only individuals with special needs will be accommodated in designated centres, while other TACs will be used for Syrians who are unregistered or who fail to fulfil their obligations.¹²⁹⁸

2. Urban and rural areas

The vast majority of the current population subject to Türkiye's temporary protection regime reside outside the camps in residential areas across Türkiye. As of the end of 2024, the total population of temporary protection beneficiaries registered with Turkish authorities was listed as 2,901,478, as of 2905.2025, the number decreased to 2,710,476.¹²⁹⁹

More than half of the Syrians were registered in 5 out of the 81 Turkish provinces hosting the highest number of Syrians (İstanbul, Gaziantep, Şanlıurfa, Hatay and Mersin). While İstanbul hosts the largest number of registered temporary protection beneficiaries with 470,935, this only corresponds to 2.91% of its population. Conversely, temporary protection beneficiaries correspond to 14.74% of the population in Gaziantep, 9.55% in Şanlıurfa, 10.80 % in Hatay and in 8.05% in Mersin. In Kilis, 1 out of every 4 people are Syrians.¹³⁰⁰

Syrian nationals are barred from owning property in Türkiye because of a reciprocal ban that Syria implemented after Hatay issue since 1930.¹³⁰¹ Refugees rent houses or live in blighted neighbourhoods. Many face harsh living conditions and lack healthy housing. Poor economic conditions lead to cramped, unhealthy apartments, affecting their health. The level of inclusion and quality of accommodation of temporary protection beneficiaries varies from one province to another. Syrian refugees in Türkiye face housing discrimination through selective overpricing, ethnic filtering, and arbitrary interrogations, driven by anti-refugee sentiment¹³⁰². To navigate these challenges, Syrians often rely on local community members, Syrian mediators, and Syrian-only segregated settlements¹³⁰³. After 2021, the rising cost of living in urban areas has had a devastating impact on refugees and deteriorated their living conditions.¹³⁰⁴ Between 2019 and 2023, rental prices in Türkiye surged by 583% nationwide, with an average increase of 697% in metropolitan cities. The highest rental hike occurred in Antalya at 1,109%, followed by Mersin at 963%, Muğla at 935%, Ankara at 833%, and İstanbul at 713%,¹³⁰⁵ amid inflation-driven rent increases disproportionately affecting the most vulnerable groups, including refugees. In 2024, rental prices remained a significant issue.¹³⁰⁶ Although there were two opposing views¹³⁰⁷ on how returns might affect housing costs, by June 2025—given that only 250,064 Syrians had returned—no noticeable impact on rental prices

¹²⁹⁶ UNHCR, 'Registration with the Turkish authorities', last accessed 13 July 2023, available [here](#)

¹²⁹⁷ PMM, 'GEÇİCİ KORUMA', 14 June 2024, available in Turkish at: <https://bit.ly/3NSpvkG>.

¹²⁹⁸ PMM, Faaliyet Raporu 2024; PMM, Stratejik Plan 2024-2028.

¹²⁹⁹ PMM, 'GEÇİCİ KORUMA', 14 June 2024, available in Turkish at: <https://bit.ly/3NSpvkG>.

¹³⁰⁰ PMM, 'GEÇİCİ KORUMA', 14 June 2024, available in Turkish at: <https://bit.ly/3NSpvkG>.

¹³⁰¹ Hürriyet, 'Meclis Göç ve Uyum Komisyonu Başkanı: Suriyeli Türkiye'den mülk alamıyor', 7 October 2023, available [here](#).

¹³⁰² Sunata, U., & Güngördü, F. N. (2024). (Non-state) actors in internal bordering and differential inclusion: Syrian refugees' housing experience in Turkey. *Ethnic and Racial Studies*, 1–22. Available [here](#).

¹³⁰³ Akdemir Kurfalı, M., & Özçürümez, S. (2023). Residing without settling: Housing market and tactics of Syrian forced migrants in Turkey. *Population, Space and Place*, 29 (3), available [here](#).

¹³⁰⁴ Information provided by a stakeholder, May 2023.

¹³⁰⁵ BBC Türkçe, Konut krizi: 'Kiralılar 4 yılda en az 6 kat arttı, yatırımcı uzaklaştı, bankalar kredi vermeye gönülsüz', 5 June 2023, available [here](#).

¹³⁰⁶ Evrensel, Konut stoku arttı, kiracı sayısı 24 milyonu aştı, 19.05.2025, available [here](#).

¹³⁰⁷ Sputnik Türkiye, Suriyelilerin göçü ardından etkilenecek ilçeleri tek tek açıkladı: '20 bin TL'lik kiralılar 13 bin TL'ye düşecek', 12.12.2024, available [here](#); T24, Gayrimenkul uzmanları: Suriyelilerin dönmesi konut piyasasını etkilemez, 11.12.2024, available [here](#).

had been observed. Disputes between property owners and Syrian tenants have increased. Syrians feared being deported if they filed a lawsuit against an unlawful rent increase¹³⁰⁸. Frequently, property owners file complaints against Syrian tenants in an effort to evict them and re-rent the property at a higher price. This may result in the deportation of some Syrian nationals.¹³⁰⁹ Additionally, CIMER-related complaints about Syrians increased. Particularly, property owners lodge complaints against Syrians to have them deported when they oppose unlawful requests for rent increases.¹³¹⁰

The closure of certain neighbourhoods to residency has significantly reduced housing opportunities for Syrians in both urban and rural areas. Only a small number of Syrians in urban areas can move to middle-class neighbourhoods that are still open to residency.¹³¹¹ Before these closures, their relocation options were already limited to specific neighbourhoods, but now they can only move within the same neighbourhood. This restriction also means that even if their financial situation improves, they cannot move to a better home in another Syrian-populated neighbourhood, forcing them to remain in poor living conditions¹³¹². Address verification started at the end of 2021 and continued in 2024. In case a person was not at home during the address verification visits, their IDs would be inactivated; in some cases they might not be aware of the situation, which makes them vulnerable if they encounter any ID control at the street. Due to the increased anti-migrant sentiment, often targeting Syrians, Syrians prefer to be less visible in the urban areas.¹³¹³ In 2024, some stakeholders reported that even when individuals stayed at home to await police verification visits, they were marked as absent without any doorbell being heard, resulting in the deactivation of their ID cards¹³¹⁴. This problem emerged after the Kayseri incidents, when Syrians became hesitant to leave their homes. A stakeholder reported that in Adana, shortly after these events, a mother and her son—both residing together—experienced different treatment: one’s ID was deactivated while the other’s remained active, despite no police visits to their residence.¹³¹⁵ (See: Exclusion and cancellation of temporary protection).

A study on Syrians seasonal agricultural workers, conducted by FAO¹³¹⁶, displays that majority of them live in makeshift tents, where they have challenged on accessing safe drinking water, hygiene and sanitation, particularly affecting women and children. However, there are examples with adequate infrastructure. Stakeholders mentioned that in 2024, problems arose concerning agricultural workers, as some tent settlements were located in closed neighbourhoods.¹³¹⁷

The impact of the earthquakes:¹³¹⁸

The main obstacle confronting refugees in the earthquakes-affected region, especially in Hatay, is securing adequate housing.¹³¹⁹ While accommodation presents a significant challenge for all residents in the area, refugees encounter additional barriers in accessing suitable housing. Refugees must declare a formal address to maintain active identification cards, enabling them to access their rights and essential services. Failure to declare an address may result in inactive ID cards, leading to potential difficulties and obstacles for refugees in accessing necessary resources. For example, a Syrian family who was living in a heavily damaged building could find themselves in a situation where they could not access education or healthcare

¹³⁰⁸ Information provided by stakeholders, March - April 2024.

¹³⁰⁹ Information provided by a stakeholder, May 2023.

¹³¹⁰ Information provided by a stakeholder, May 2023.

¹³¹¹ Information provided by stakeholders, March - April 2024.

¹³¹² Heinrich Böll Stiftung, *Göçmen Mahallelerinde Yaşam: Türkiye’de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı*, November 2023, available [here](#).

¹³¹³ Information provided by stakeholders, March - April 2024.

¹³¹⁴ Information provided by multiple stakeholders, March 2025.

¹³¹⁵ Information provided by a stakeholder, June 2025.

¹³¹⁶ FAO. 2023. *Geçici Koruma Altındaki Suriyeliler ve Ev Sahibi Topluluklardan Oluşan Mevsimlik Tarım İşçilerinin Karşılaştıkları Zorluklar Hakkında Genel Bir Değerlendirme*, available [here](#).

¹³¹⁷ Information provided by a stakeholder, February 2025.

¹³¹⁸ This section is based on the information from several resources: Kirkayak Kültür, February 2024, “We started from zero, we returned to zero again...”, available [here](#) & Türk Tabipleri Birliği & Sağlık ve Sosyal Hizmet Emekçileri Sendikası Şubat 2023 Depremleri 1. Yıl Raporu, 2024, available [here](#) & Information provided by stakeholders, March - April 2024 and Information provided by refugees in focus group discussions, April 2024.

¹³¹⁹ Information provided by stakeholders, March - April 2024 and refugees in a focus group discussion, April 2024.

due to the restriction code identified in their IDs, as their address was removed from the system.¹³²⁰ In some cases, they might not be aware of the situation. Syrians no longer want to go to the immigration office with the idea that a restriction code may have been defined for them without their awareness.¹³²¹ The fear drives people not to access services. Moreover, this might cause cuts in some aids such as ESN and CTE, which are very important resources to cover basic needs for many families.¹³²²

The other main accommodation types in the region are rental flats, informal tent camps, container settlements, and lastly Temporary Accommodation Centres. Before the earthquake, similar to the rest of Türkiye, Syrians, and other refugees were living in rental houses. Renting a flat, especially in the most affected areas, is almost impossible for refugees.¹³²³ Closed neighbourhood practices, a scarcity of housing in the centres, and an increase in housing rents due to inflation exacerbate the situation. Tenants are often compelled to vacate their rented accommodations since landlords want to increase rents, sometimes more than the legal obligation, or want to move to these flats leading to forced evictions. Refugees hesitate to file complaints due to increased vulnerabilities and fear of being deported. Although registration has been reopened for five neighbourhoods in Hatay, these areas are not the ones usually preferred by refugees.¹³²⁴

In Şanlıurfa sometimes refugees continue living in moderately damaged buildings, leaving them in precarious conditions. Overall, the combination of these factors poses significant difficulties for refugees seeking to secure stable and affordable housing to rent in the aftermath of the earthquake. Sometimes, this situation leads them to find accommodation to rent in remote places which makes accessing to healthcare, education and employment very difficult for them.

Living in informal camps remains common among refugee groups at the time of writing this report. These camps often have substandard conditions, lacking access to basic necessities such as water and sanitation, and presenting security and privacy concerns, particularly for women and children¹³²⁵. Single women, feeling vulnerable, opt to remain invisible to avoid becoming targets of violence or abuse. Inadequate security measures, including insufficient lighting, contribute to an environment conducive to abuse, increasing cases of gender-based and domestic violence. While NGOs' mobile teams effort to provide essential services in these informal tent settlements, the sudden removal of tents without prior notice makes it challenging for NGOs to track vulnerable cases effectively¹³²⁶. One of the most significant issues refugees face in informal tent areas is the lack of fixed addresses, consequently, refugees may encounter difficulties in maintaining active identification during their stay in these areas.

While residents of container cities may encounter similar problems, especially regarding security, the conditions are generally better than those in tents. Since the containers have been recently provided addresses, refugees can declare their addresses. The Bebek Köyü area in Adıyaman hosts refugees in container settlements, albeit far from the city center, raising concerns about isolation and vulnerability. Similarly, a camp area consisting of 3,182 containers was prepared for the settlement of refugees in the Üzümdalı neighbourhood of Antakya, located in a remote area of the city. Currently, this area is called Hilalkent, and the number of containers increased, and refugees living there. The containers in the area are office-type containers, consisting of a single compartment, lacking toilet and bathroom facilities. The lack of proper facilities in container settlements also adds to the discomfort experienced by refugees. In Hilalkent Hatay, they need to share the shower, toilets, and kitchen areas, which makes it very difficult especially for women to access the toilet or shower.

Hatay Branch of the Human Rights Association¹³²⁷ reports the violation of rights in Hilal Kent, the container city area, from health to nutrition, from education to security, from the right to privacy to children's rights. According to their estimation, there were approximately 3500 containers in total, 800 in Hilalkent1 container city and 2700 in Hilalkent2, which both located in Üzümdalı village, approximately 80% of these containers were in use. In 2024, challenges related to residing in container settlements continued in Hatay. In the

¹³²⁰ Information shared by a refugee in a focus group discussion, April 2024.

¹³²¹ Information shared by stakeholders, March – April 2024.

¹³²² Information shared by stakeholders, March – April 2024.

¹³²³ Information provided by stakeholders, March - April 2024 and Information provided by refugees in focus group discussions, April 2024.

¹³²⁴ Information shared by stakeholders, April 2024.

¹³²⁵ Information provided by stakeholders, March - April 2024.

¹³²⁶ Information provided by stakeholders, March - April 2024.

¹³²⁷ IHD, March 2024, Hilalkent Konteyner Yaşam Alanındaki Hak İhlalleri Raporu, available [here](#).

Hilalkent settlement located in the Üzümdalı district, stakeholders raised concerns regarding protection risks. The living conditions of Syrian refugees were reportedly less favourable than those of Turkish citizens; for example, refugees were required to use shared bathroom facilities, raising serious privacy concerns—particularly regarding the separation of adult and child spaces. Reports indicated an increase in the number of incidents of child abuse. Gender-related disparities were also observed, with caregiving responsibilities predominantly falling on women. Although there were indications of increased violence against women, such cases remained largely underreported. Even when survivors secured protection measures against the perpetrators, enforcement remained weak, as perpetrators could easily re-enter the settlement, undermining the effectiveness of these interventions.¹³²⁸

Living in segregated areas, located in remote places leads to their isolation and creates a ground for being targeted. As a result, this deepens the feeling of otherness and makes it difficult to speak of well-being in such circumstances.¹³²⁹ Lack of privacy and insufficient security cause increased cases of gender-based and domestic violence.

It is reported that living in tents in the earthquake zones exacerbates domestic violence, particularly for refugee women. These conditions worsen the situation for women experiencing violence, as they face continued assaults and threats even under restraining orders. Additionally, the lack of translation support, difficulty reaching the police, and challenges in accessing women's shelters due to their migrant status and family circumstances further complicate their ability to seek safety and assistance.¹³³⁰

There is also an increase in child abuse incidents in earthquake-affected regions, with the exact number of affected children remaining undetermined. Early marriages were reported to be more common among refugees in these areas, particularly among young women and children who have lost their parents. The lack of data or statistics underscores the challenge of accurately assessing the scope of these issues.¹³³¹

Additionally, efforts to segregate refugee and Turkish citizen living areas in tent/container cities indicate a concerning trend of anti-migrant sentiment. Limited mobility of women and children in camps further exacerbates the situation, as men often leave for work, leaving them confined due to safety concerns.¹³³² Moreover, inadequate private spaces in informal tent camps or container settlements pose challenges, particularly for women and children's sanitation needs. Overall, these issues deepen the sense of otherness among refugees and make achieving well-being in such conditions challenging.

¹³²⁸ Information provided by a stakeholder, March 2025

¹³²⁹ Türk Tabipleri Birliği & Sağlık ve Sosyal Hizmet Emekçileri Sendikası Şubat 2023 Depremleri 1. Yil Raporu, 2024, available [here](#)

¹³³⁰ Gender Analysis in Earthquake Areas: Women's Access to Justice and Legal Aid, Prof. Dr. Gülriz Uygur, available [here](#).

¹³³¹ Ibid.

¹³³² Kirkayak Kültür, February 2024, "We started from zero, we returned to zero again...", available [here](#).

E. Employment and education

1. Access to the labour market

Indicators: Access to the Labour Market

- | | |
|--|---|
| 1. Does the law allow for access to the labour market for beneficiaries?
❖ If yes, when do beneficiaries have access the labour market? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6 months |
| 2. Does the law allow access to employment only following a labour market test? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does the law only allow asylum seekers to work in specific sectors?
❖ If yes, specify which sectors: | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Does the law limit beneficiaries' employment to a maximum working time?
❖ If yes, specify the number of days per year | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 5. Are there restrictions to accessing employment in practice? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

1.1. Legal conditions and obstacles to access in practice

Temporary protection beneficiaries have the right to apply for a work permit on the basis of a Temporary Protection Identification Card, subject to regulations and directions to be provided by the Presidency.¹³³³ The Regulation on Work Permit for Foreigners under Temporary Protection, adopted on 15 January 2016, regulates the procedures for granting work permits to persons under temporary protection. Temporary protection beneficiaries are required to apply for a work permit in order to access employment.¹³³⁴ An application for a work permit may be lodged following 6 months from the granting of temporary protection status,¹³³⁵ by the employer through an online system (*E-Devlet Kapısı*) or by the beneficiary him or herself in the case of self-employment.¹³³⁶

The Regulation foresees an exemption from the obligation to obtain a work permit for seasonal agriculture of livestock works.¹³³⁷ In that case, however, beneficiaries must apply to the relevant provincial governorate to obtain a work permit exemption.¹³³⁸ The Ministry of Family and Social Services may also limit the number and provinces where temporary protection beneficiaries may work under seasonal agriculture of livestock jobs.¹³³⁹ Beyond special rules in the context of agriculture and livestock work, the Regulation prohibits beneficiaries from applying for professions which may only be performed by Turkish nationals.¹³⁴⁰

When deciding on granting the right to apply for a work permit, the Ministry of Family and Social Services takes into consideration the province where the beneficiary resides as a basis.¹³⁴¹ However, it may cease to issue work permits in respect of provinces which have been determined by the Ministry of Interior to pose risks in terms of public order, public security or public health.¹³⁴² The Ministry may also set a quota on temporary protection beneficiaries based on the needs of the sectors and provinces.¹³⁴³ The number of beneficiaries active in a specific workplace may not exceed 10% of the workforce unless the employer can prove that there would be no Turkish nationals able to undertake the position. If the workplace employs less than 10 people, only one temporary protection beneficiary may be recruited.

¹³³³ Article 29 TPR.

¹³³⁴ Article 4(1) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³³⁵ Article 5(1) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³³⁶ Article 5(2)-(3) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³³⁷ Article 5(4) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³³⁸ *Ibid.*

¹³³⁹ Article 5(5) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³⁴⁰ Article 6(2) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³⁴¹ Article 7(1) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³⁴² Article 7(2) Regulation on Work Permit for Foreigners under Temporary Protection.

¹³⁴³ Article 8 Regulation on Work Permit for Foreigners under Temporary Protection.

In 2025, the work permit fee for temporary protection applicants was of 3,932.70 TRY (87 EUR) for jobs lasting more than 1 one year.¹³⁴⁴ Under the Regulation, temporary beneficiaries may not be paid less than the minimum wage.¹³⁴⁵ In 2025, the minimum wage (net) was 26.005,50 TL (around 577 EUR).

As of 2024, a total of 109,370 work permits were issued for Syrians holding temporary protection status.¹³⁴⁶ Approximately more than 1 million Syrians are estimated to be working informally without legal protections and rights.¹³⁴⁷ Research indicates several possible factors contributing to the low employment rate among women: (1) cultural factors, (2) conditions in the informal sectors that hinder women from fulfilling their household responsibilities, and (3) a higher number of children per household that need care¹³⁴⁸. In Türkiye, Syrian women under Temporary Protection are primarily employed in the food and agriculture sectors.

11,779 refugees were registered with İŞKUR with EU support in the first half of 2024, bringing the total to 83,789, a majority of those registered were men (51%). Most Syrian refugees registered with İŞKUR have received few or no job offers, even among young males with a decent level of education and Turkish language proficiency, consequently, the refugee community does not view İŞKUR as a reliable source of support¹³⁴⁹.

Temporary protection beneficiaries who cannot provide the necessary documents under the Recognition and Equivalency Regulation, or whose diplomas cannot be verified, are subject to special procedures. For those with original diplomas and transcripts that cannot be verified, and for those who can only provide copies or certified translations of their diplomas and/or transcripts, the recognition process proceeds based on recommendations from the Field of Science Advisory Commissions, university opinions, and the Recognition and Equivalency Commission. Individuals unable to provide complete documents must submit a Temporary Protection Identification Document, a declaration form with their educational information, and, if applicable, official documents and certified copies of their work experience in their field¹³⁵⁰. Information is provided in Turkish, English and Arabic.

Beneficiaries face difficulties on accessing information on the work permit system. Additionally, the process to obtain a work permit in Türkiye for Syrians is particularly difficult. In the frame of the EU-funded projects, during the first half of 2024, various initiatives implemented awareness-raising and capacity-building activities for businesses in an effort to improve refugee and refugees and vulnerable host community beneficiary access to the labour market. In the first half of 2023, these activities reached over 2,113 businesses were reached of which 92% were small-scale enterprises by the mid-2024. According to reports, the difficulties employers face in obtaining work permits for refugees, including the costs, bureaucracy and waiting times, create significant disincentives to employ refugees.¹³⁵¹ Overall challenges include (1) difficulties in accessing work permits, (2) exploitation in workplaces, (3) no complaint mechanism when they do not work legally, (4) increasing the risk of being exposed to GBV.¹³⁵²

1.2. Working conditions

Experiences of temporary protection beneficiaries in Türkiye regarding the integration process differ from city to city. However, having to work informally / without security, low wages and language barriers were the most reported problems in all provinces.

¹³⁴⁴ Ministry of Labour and Social Security, Payment of Official Charges and Stamp Paper Fees, last accessed 10.06.2025, available in Turkish [here](#).

¹³⁴⁵ Article 10 Regulation on Work Permit for Foreigners under Temporary Protection.

¹³⁴⁶ UNHCR, Facts about refugees and stateless people in Türkiye, available [here](#).

¹³⁴⁷ Danish Refugee Council, Syrian Refugees' Perceptions of the (Formal) Labour Market in Southeast Türkiye, August 2021, available [here](#) ILO (2023). ILO's support to refugees and host communities in Turkey.

¹³⁴⁸ ILO, Türkiye'deki Depremlerin Ardından Yerel İşgücü Piyasası Dinamiklerinin ve Beceri İhtiyaçlarının Değerlendirilmesi, 28 August 2023, available [here](#).

¹³⁴⁹ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 13, December 2024, available [here](#).

¹³⁵⁰ Available [here](#).

¹³⁵¹ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 11, June 2023, available at: <https://bit.ly/44nbVwT>.

¹³⁵² Information provided by stakeholders, March – April 2024.

Syrians are impacted by the widespread practice of undeclared employment under substandard working conditions and low wages.¹³⁵³ A research highlights the factors that drive Syrian workers into the informal sector, such as administrative barriers, monetary and non-monetary incentives, and a lack of familiarity with labour regulations, and shows that Syrian business owners and self-employed individuals operate informally due to the desire to hire Syrian workers, difficulties in adhering to labour regulations, and fear of deportation.¹³⁵⁴ Another study emphasises other barriers such as anti-refugee sentiments, geographical restrictions and economic crises.¹³⁵⁵ A significant number of Syrians, work in agricultural sector that match their experiences in Syria or the skills they have acquired in Türkiye, however, Syrians working seasonally in the agricultural sector often need to find jobs in cities outside their registration, which creates difficulties in accessing services. If it is discovered that they are not registered in the city where they are working, they are required to return to their registered cities.¹³⁵⁶ People are vulnerable to exploitation and may not receive their salaries. Some projects offer salary support during training periods, to prevent any issues to access salary, salaries are directly deposited into the individual's bank account.¹³⁵⁷

Syrians with professions, on the other hand, either did not engage in the labour market because they could not find a job that matched their talents and expertise, or they were forced to accept jobs well below their qualifications.¹³⁵⁸ Professions such as doctors, lawyers, teachers, and pharmacists require very long procedures for recognition of qualifications to work in their fields, however, those specialized in areas such as services, trade, and information technology, which do not require recognition of qualification, can find jobs easier in the private sector.¹³⁵⁹

Poor health and safety conditions at work are also a matter of concern, it was reported that 94 migrants lost their lives in work-related accidents in 2024. 52% of the victims were Syrians.¹³⁶⁰

Women, in particular, face significant challenges in obtaining effective access to the labour market. This is due, on the one hand, legal restrictions such as obstacles to access childcare, lack of information and training opportunities.¹³⁶¹ On the other hand, traditional gender roles assigned to women as caretakers, especially in southern Türkiye regions such as **Gaziantep**, mean that women's access to public space is limited compared to men, while training opportunities mainly revolve around traditional vocations such as hairdressing or sewing. In addition, where they do take jobs outside their homes, women in the textile sector often face discrimination and ill-treatment, especially single women face gender based violence in workplaces.¹³⁶² Syrian women often try to find a solution by doing piecework at home in order to ensure their economic freedom¹³⁶³. The Promotion of Economic Prospects Project (PEP) in Türkiye, implemented by GIZ takes a multifaceted approach to foster gender equality, 1620 Syrian women participated in vocational training tailored to meet the skills required by the Turkish labour market.¹³⁶⁴

The Turkish labour market also presents high exploitation risks for children, given the widespread phenomenon of child labour and exploitation in areas such as agriculture and textile factories.¹³⁶⁵ Ministry of Labour and Social Security announced a six-year National Action Plan to Fight Against Child Labour in

¹³⁵³ Evrensel, 'Kayıt dışı, güvencesiz çalışma ve sömürü kısılcacında mülteci işçiler', 2022, available in Turkish at: <https://bit.ly/43oe9ee>.

¹³⁵⁴ Badalıç, V. (2023). Trapped in the underground economy: Syrian refugees in the informal labour market in Turkey. *Third World Quarterly*, 44(5), 967–984. <https://doi.org/10.1080/01436597.2023.2170224>

¹³⁵⁵ Mohammed, U. (2024), "Caught in crises: Syrian refugees in Türkiye's labor market", *International Journal of Migration, Health and Social Care*, Vol. 20 No. 2, pp. 320-336. <https://doi.org/10.1108/IJMHS-08-2023-0077>

¹³⁵⁶ Mülteci tarım işçisi kadınların çadır ve tarla arasındaki yaşamı, available [here](#)

¹³⁵⁷ Information provided by a stakeholder, March 2024.

¹³⁵⁸ Relief Web, 'Türkiye 3RP Country Chapter 2023-2025', 16 March 2023, available [here](#)

¹³⁵⁹ Heinrich Böll Stiftung, Göçmen Mahallelerinde Yaşam: Türkiye'de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı, November 2023, available [here](#)

¹³⁶⁰ Işık Meclisi, 'İç cepheyi sağlamlaştırma' siyasetinin örtmeye çalıştığı gerçeklerden birisi de iş cinayetleri... 2024 yılında en az 1897 işçi iş cinayetlerinde hayatını kaybetti, 13.01.2025, available [here](#).

¹³⁶¹ Alternatif Politika, 'Gender Negotiation In Syrian Women's Paid Workforce Participation In The Context Of Forced Migration', 2022, available [here](#).

¹³⁶² IOM, 'Yeniden yerleştirme', 2023, available at: <https://bit.ly/3XPYsuW> and Suriyeli kadın işçiler: '6 bin liraya kayıt dışı çalışmak zorundayız', 13 September 2023, available [here](#).

¹³⁶³ Hayata Destek, Sanki yeniden doğmuş gibi, November 2023: available [here](#).

¹³⁶⁴ GIZ, 2024, Women Empowerment Through Promotion of Economic Prospects Project In Türkiye, available [here](#).

¹³⁶⁵ Irina Fehr & Conny Rijken, 'Child Labor Among Syrian Refugees in Turkey', *Frontiers*, 2022, available [here](#).

2017. Research showed that at least 4.4% of the child population was working, with the main causes of child labor in Türkiye being child poverty, deficiencies in social protection, and the informal economy.¹³⁶⁶ Child labour has also been observed as a barrier to education, particularly for older boys aged 10–13 and 14–17, who are either out of school or at risk of dropping out. The loss of household income during the COVID-19 pandemic further exacerbated reliance on child labour, as older children—mostly boys—were compelled to support their families financially, not only to cope with the high cost of living, but also to enable the continued schooling of their younger siblings.¹³⁶⁷ In a tragic case reported in 2024, a 14-year-old Syrian child worker lost his life while working in the drilling sector, highlighting the hazardous conditions that children can face in informal and unregulated employment.¹³⁶⁸

Youth unemployment is another critical issue to which attention must be paid. According to TUIK, the youth unemployment rate in Türkiye among 15-24 year olds was of 16.3% in 2024.

Stakeholders mentioned that in 2024, as in many families, father irregularly crosses the borders and make it to Europe, the rest of the family remains and usually the children start to work instead of going to school.

Refugees and host community members received a variety of employability capacity development and support services in 2024. During the first half of 2024, an additional 11,779 beneficiaries were enrolled in short-term vocational training programmes and 6,104 individuals completed training designed to increase their employability. As of June 2023, 83,789 beneficiaries had completed short-term vocational skills development training with EU refugee programme support. Since the project's inception, a total of 149,110 people has benefited from employment counselling services.¹³⁶⁹ Between 2014 and 2024, a total of 3,999,831 foreign trainees participated in courses organized in public education centres, with 3,044,723 of them being Syrian trainees.¹³⁷⁰

There are projects aiming to address some of the abovementioned challenges. "Increasing Employability for Syrians and Host Community Members in the Renewable Energy Sector Project" has been carried out since 2020 in cooperation with the General Directorate of Lifelong Learning and the United Nations Development Programme¹³⁷¹. ILO Promoting Resilience and Social Cohesion through Decent Livelihood Opportunities Project aims to promote decent work and sustainable livelihood opportunities, with particular emphasis on investing in a skilled and competent workforce, promoting job creation and job development, protecting employment, and strengthening labour market governance institutions and practices for both home and host communities in Istanbul, Izmir, Bursa, Ankara, Adana, Mersin, Şanlıurfa, Kahramanmaraş, Konya, Hatay, Eskişehir, Denizli, Gaziantep, Manisa and Kilis¹³⁷². Transition to Formality Programme (KIGEP), which is implemented by the ILO Office for Türkiye and the Social Security Institution (SSI) in coordination with the Ministry of Labour and Social Security and the Directorate of International Labour Force, employers whose workplaces are registered in one of the provinces of Adana, Ankara, Aydın, Bursa, Gaziantep, Istanbul, Izmir, Kahramanmaraş, Kilis, Kocaeli, Konya, Manisa, Mersin, Osmaniye and Şanlıurfa, may receive support payment for Syrian workers whom they employ. A monthly support payment of 2,500 TRY for 5,790 employees including 2,895 Syrians under Temporary Protection and 2,895 Turkish citizens are provided for six months. Besides, one-off work permit fee of 1,500 TRY per worker is reimbursed by the Programme for 2,895 Syrian employees in 2023. Stakeholders noted that it remains unclear whether such support continued to be available in 2024.¹³⁷³

The "Supporting Transition to the Labor Market Project,"¹³⁷⁴ funded by the EU under FRIT 2 and facilitated by the World Bank, is implemented by the Ministry of Labor and Social Security, İŞKUR, and the Turkish Red Crescent. The project aims to enhance the employability of ESSN beneficiaries and Turkish citizens,

¹³⁶⁶ UNICEF, Çocuk işçiliği, available [here](#).

¹³⁶⁷ UNICEF, Report on Analysis for Out-of-school Syrian Children Türkiye Country Report, July 2024, available [here](#).

¹³⁶⁸ Sol Haber, Çalışırken ölüyorlar: 15-17 yaş arası her dört çocuktan biri işçi, 19.04.2025, available [here](#).

¹³⁶⁹ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 13, December 2024, available [here](#).

¹³⁷⁰ Hayat Boyu Öğrenme Genel Müdürlüğü 2024 İzleme Değerlendirme Raporu: available [here](#).

¹³⁷¹ Hayat Boyu Öğrenme Genel Müdürlüğü, 29.12.2023, available [here](#).

¹³⁷² ILO, available [here](#).

¹³⁷³ Information provided by a stakeholder, May 2025.

¹³⁷⁴ Resmi Gazete, İşgücü Piyasasına Geçişin Desteklenmesi Projesi (P171471), available [here](#).

aiding their access to the labor market and helping employment transition out of the Social Cohesion Assistance (SUY) program. Training activities will be conducted at Turkish Red Crescent Community Centres in various cities (Adana, Bursa, Gaziantep, Istanbul, Kocaeli, Konya, and Şanlıurfa. A "Labor Market Transition Guide" will also be created to provide essential information and support to local and migrant beneficiaries during their job market transition and integration.

Entrepreneurship

Self-employed Syrians have encountered significant difficulties on the labour market. Access to financial services remains a persistent obstacle for refugee owned SMEs due to a number of factors, including inability to benefit from any established micro or small enterprise financing schemes, and being unaware of any sources of financing. A study showed that Syrian entrepreneurs can manage their projects and obtain financing resources and loan.¹³⁷⁵

Several initiatives have been enacted beginning in 2021 to enhance the entrepreneurial skills and potential of self-employed Syrians. Under the EU-financed projects, around 720 Syrian refugee-owned small and medium-sized enterprises (SMEs) received advisory services, including budget management, occupational health and safety, and proposal writing and 275 Syrian-owned businesses received financial and/or material assistance to mid-2023. 4,070 Syrians are benefitted from the entrepreneurship training. By June 2023 around 674 refugee-owned enterprises had been established (45%) or expanded (55%), 54% were Syrian-owned with most of the enterprises in the micro or small size categories.¹³⁷⁶

Some projects have been implemented to officially register businesses owned by refugees, but a lack of detailed information has been provided about what their responsibilities are as a registered business, regarding the taxes, etc., and the difficulties these business owners experience after becoming registered and how sustainable these projects are not fully known and evaluated.¹³⁷⁷

Through livelihood and employment opportunities, ICMPD, Ministry of Industry and Commerce-managed ENHANCER project aims to increase the entrepreneurial activity of Syrians and host communities by fostering the development of new products and markets and providing a conducive environment. The initiative has been implemented in 11 provinces, Istanbul, Ankara, Izmir, Bursa, Gaziantep, Adana, Mersin, Konya, Sanlurfa, Kayseri, and Hatay, with a budget of 32,502,249 EUR. The project is expected to be implemented until December 2025.¹³⁷⁸

The impact of the earthquakes:

The aftermath of earthquakes in the region has led to significant challenges in accessing employment opportunities for affected individuals. As of March 2023, the number of paid employees in 11 provinces located in the earthquake zone decreased 23.6 percent compared to the end of 2022, in 4 provinces (Kahramanmaraş, Hatay, Adıyaman and Malatya) which were affected the most by the earthquake the decrease in the number of workplaces was over 50 percent and the total number of employees decreased by 28 percent¹³⁷⁹. More than 40 percent of the employees in Hatay left their jobs, migrated, or lost their lives. According to the ILO (2023), the earthquakes left more than 658,000 workers unable to earn their living¹³⁸⁰. Since many workplaces have been destroyed and significant losses were also experienced especially in the sectors many refugees are employed such as textile and agriculture, the limited job market leads to hurdles for those seeking employment for refugees. In 2024, in addition to the provinces most affected by the earthquakes, cities such as Adana—where the impact was limited but which were seen as

¹³⁷⁵ Alkhazam, and Ugurlu, 2023. International Journal of Economics and Management Engineering, 17 (7).

¹³⁷⁶ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 13, December 2024, available [here](#).

¹³⁷⁷ Information provided by a stakeholder, March 2024.

¹³⁷⁸ ICMPD & Ministry of Industry and Technology, 'Enhancer Project', last accessed 13 July 2023, available [here](#)

¹³⁷⁹ TEPAV, July 2023, Deprem Bölgesinde Sürdürülebilir İş Gücü İstihdamı: EBRD - TEPAV Field Survey and Results April 2023 İhtiyaçlar ve Fırsatlar TEPAV Sahâ Araştırması ve Bulguları, available [here](#).

¹³⁸⁰ ILO (2023) Assessing the Local Labour Market Dynamics and Skills Needs Following the Earthquakes in Türkiye

safe destinations—also experienced reduced employment opportunities due to the significant population increase following the disaster.¹³⁸¹

The earthquakes also had a negative impact on the ability of government and non-government institutions to provide services related to employment and enterprise development to refugees and host community members, due to the loss and damage of their facilities and equipment. Considerable damage was experienced by the Provincial Directorates of the Public Employment Agency (İŞKUR) in Adıyaman, Kahramanmaraş and Gaziantep.¹³⁸²

Furthermore, concerns about health, disabilities, and the fear of gender-based violence in workplaces contribute to difficulties in finding jobs. The situation is particularly concerning for women, as safety concerns for themselves and their children hinder their ability to seek employment, and as their burden on caring the people with disability and domestic work increases¹³⁸³. Research analysing the needs of women entrepreneurs in the region post-earthquake indicates that 70% of them face increased caregiving responsibilities for children, the elderly, and individuals with disabilities. Therefore, there is a critical need to improve and enhance caregiving facilities to increase women's employment opportunities, aligning with previous studies on the situation of Syrian women under temporary protection before the earthquakes¹³⁸⁴. Women mainly work as agricultural labourers near the tent camps, and job opportunities in male-dominated industries further limit their access to employment.¹³⁸⁵

Moreover, the heightened demand for workers in the construction sector following the earthquakes has been addressed by refugees. However, the concentration of job opportunities in construction limits refugees' ability to find work in their specialised fields and exposes them to potential exploitation. Interviews with refugee workers reveal that many are uninsured and receive wages below the minimum wage, further deepened their precarious employment situation.¹³⁸⁶

In cooperation with UNHCR, textile workshops were established in 19 public education centres in 5 provinces affected by the earthquake region.¹³⁸⁷ There are some projects led by NGOs. The Social Entrepreneurship, Empowerment, and Integration Project,¹³⁸⁸ funded by the EU and implemented by the General Directorate of Development Agencies of the Ministry of Industry and Technology with the support of the World Bank aims to boost women's employment in the region, and supports new project proposals to empower women entrepreneurs including the involvement of Syrian workers, with a focus on encouraging Syrian women to join the workforce. Grant support and mentoring training are also offered to project participants. Sustenance and Recovery Bazaar for Access to Secure Food – SAFEBAZE Project¹³⁸⁹ supported by WFP, implemented by ASAM aims to provide indirect services to 22,000 residents residing in the Üzümdalı Temporary Shelter Center, including 30 business owners affected by the earthquake and their families, and to meet their urgent food needs. A marketplace will be built that will accommodate approximately 12 small businesses and 18 mobile stalls to enable vendors to sell various food products, thereby enhancing access to food and increasing local producers' access to markets.

The stakeholders in Hatay explicitly mentioned that the discourse of after the earthquake there will be many job opportunities for refugee communities is not true. Many individuals lost their jobs due to the devastating effect of earthquakes. In 2024 especially women cooperatives empowered, thanks to material and cash-based support.¹³⁹⁰

¹³⁸¹ Information provided by a stakeholder, June 2025

¹³⁸² DG NEAR, EU Support to Refugees in Türkiye, Results Framework Monitoring Report No. 12 December 2023, available [here](#)

¹³⁸³ Information provided by stakeholders March – April 2024.

¹³⁸⁴ Kagider and UN Women. 2023. Deprem Bölgesindeki Kadın Girişimciler İhtiyaç Analizi.

¹³⁸⁵ Kırkayak Kültür, February 2024, “We started from zero, we returned to zero again...”, available [here](#).

¹³⁸⁶ Ibid.

¹³⁸⁷ Hayat Boyu Öğrenme Genel Müdürlüğü 2023 Yılı Birim Faaliyet Raporu: available [here](#).

¹³⁸⁸ SEECO, Proje Teklif Çağrısı, available [here](#).

¹³⁸⁹ ASAM, Güvenli Gıdaya Erişimi Kolaylaştırma ve Destekleme Projesi, available [here](#).

¹³⁹⁰ Information provided by a stakeholder, March 2025.

2. Access to education

Indicators: Access to Education

1. Does the law provide for access to education for children beneficiaries? Yes No
2. Are children able to access education in practice? Yes No

Under Turkish law, “basic education” for children consists of 12 years, divided into 3 levels of 4 years each. All children in Turkish jurisdiction, including foreign nationals, have the right to access “basic education” services delivered by public schools. All children registered as temporary protection beneficiaries have the right to be registered at public schools for the purpose of basic education.

2.1. Public schools

Public schools in Türkiye are free of charge. They instruct in Turkish and teach a standardised Ministry of National Education curriculum, and are authorised to dispense certificates and diplomas to foreign national children with full validity.

In order to enrol in public schools, children and their parents need to have Temporary Protection Beneficiary Identification Cards and they are registered in the city where they reside. Children who are not yet registered can be temporarily enrolled as a “guest student” which means that they can attend classes but will not be provided any documentation or diploma in return, unless they subsequently complete their temporary protection registration and are officially admitted by the school.¹³⁹¹ However, there is a tendency not to enrol children in school as they think it will encourage parent not to register with authorities.¹³⁹²

Where a foreign national child is enrolled at public schools, the Provincial Directorate of National Education is responsible for examining and assessing the former educational background of the student and determine to which grade-level the child should be registered. In case there is no documentation regarding the past educational background, the Provincial Directorate shall conduct necessary tests and interviews to assess the appropriate grade-level to which student shall be assigned.

The Ministry of National Education was due to build 129 new schools with EU funding under the Facility for Refugees in Türkiye, to increase the enrolment rate.¹³⁹³ As of January 2022, the EU facility for refugees in Türkiye factsheet reported 89 new schools built.¹³⁹⁴ Due to the earthquake, and increased construction and labour cost effected by economic crisis, during the first six months of 2024, the Education Infrastructure for Resilience and Education for All I, II and III projects completed 57 solid structure schools.¹³⁹⁵

The education response in Türkiye is led and coordinated by the Ministry of National Education (MoNE). By 5 June 2025, 925,083 Syrian children were of school age.¹³⁹⁶ In 2024, 1,071,604 Syrian were of school age. 819,265 (76.45%) Syrian children are enrolled in education. 43,723 in kindergarten, 398,317 in primary, 273,866 in secondary, 103,359 in high school.¹³⁹⁷ Among these students, 970,097 are registered in the e-school system, 22,603 in open schools, and 15,925 in the Vocational Education Center System (MESEM).¹³⁹⁸

In 2023 stakeholders confirmed that the schooling rate was still low among Syrians in especially metropolitan cities,¹³⁹⁹ and the challenges to access schooling has increased with the earthquake in the region. In 2024, according to a recent report, although the enrolment rate has increased from 68% to 76%,

¹³⁹¹ Information provided by a stakeholder, May 2023.

¹³⁹² Information provided by stakeholders, March-April 2024.

¹³⁹³ Delegation of the European Union to Türkiye, ‘Education for all in times of crisis II’, available [here](#).

¹³⁹⁴ European Commission website, ‘EU Facility for Refugees in Türkiye’, January 2022, available [here](#).

¹³⁹⁵ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 13 December 2024, available [here](#).

¹³⁹⁶ PMM, statistics.

¹³⁹⁷ AA, İçişleri Bakanı Ali Yerlikaya, AA Editör Masası'nda soruları yanıtladı.

¹³⁹⁸ Hayat Boyu Öğrenme Genel Müdürlüğü 2023 İzleme Değerlendirme Raporu, available [here](#).

¹³⁹⁹ Information provided by stakeholders, March-April 2024.

300,000 refugee children still lack access to education.¹⁴⁰⁰ Another recent report focusing on Syrian children under temporary protection highlights that, beyond those out of school, many enrolled children are at risk of dropping out. A notable share are significantly overage for their grade or have had prolonged absences. Barriers to education remain wide-ranging. Household poverty and child labour continue to hinder enrolment, while challenges in school registration and limited adaptability of Turkish public schools affect retention. These obstacles vary by gender, age, and risk category.¹⁴⁰¹ The percentage of out of school children increases from primary school to high school. A report states that 66.3% of enrolled Syrian children attend primary or middle school, and 29.8% attend high school or university.¹⁴⁰² Şanlıurfa is one of the provinces with the lowest schooling rate, for instance in Eyubiye where 30-40 thousand Syrians live, 90 percent of the children are out of school.¹⁴⁰³

In 2024, the significantly reduced purchasing power and income of refugee families in Türkiye, due to the economic situation, have been the main causes of school dropouts among children. This exacerbates problems such as child labour and early marriage. Bullying in schools, fuelled by anti-refugee discourse, remains a significant issue. This has led to families fearing to send their children to school and children being reluctant to attend. In some cases, children themselves choose to drop out of school due to persistent bullying.¹⁴⁰⁴ Additionally, fear of deportation affects access to education.¹⁴⁰⁵ Children whose IDs become inactive due to not living in the registered city, inability to verify their addresses, or other reasons causing a security code on their IDs can access education through provisional injunctions. Although there are occasional minor issues, lawyers generally obtain injunctions that allow these children to attend school. However, challenges in implementing these decisions persist, mainly due to limited capacity at schools and varying attitudes among school administrators.¹⁴⁰⁶ The children of parents who work in seasonal agriculture sector face challenges to access education due to the frequent movement and address declaration requirement¹⁴⁰⁷. Stakeholders mentioned that in 2024, as in many families, father irregularly crosses the borders and make it to Europe, the rest of the family remains and usually the children start to work instead of going to school.

Another significant barrier to accessing education is the imposition of registration fees. Although this is an unlawful practice, some schools in İzmir reportedly demand up to 4,000 TRY from families, an amount many cannot afford. NGOs attempt to advocate on behalf of affected families before district directorates of national education but often face difficulties in convincing officials that such payments were requested. Additionally, some school administrations claim that their quotas are full, although such quotas are not officially recognized.¹⁴⁰⁸ In 2024, as a measure to address school non-attendance among children, Şanlıurfa and Kilis PDMMs deactivated the TP IDs of families whose children were not enrolled in or attending school.¹⁴⁰⁹

Another barrier to accessing education is the situation of children of seasonal workers who are employed far from city centres in provinces such as Adana. Stakeholders noted that even when these workers obtain travel permits or exemption certificates from work permit requirements, their children are still unable to attend school due to a lack of transportation. Consequently, many of these children end up working alongside their parents.¹⁴¹⁰

¹⁴⁰⁰ UNICEF, Transforming Education Access through Transportation for Refugee and Earthquake-Impacted Children in Türkiye, December 2024, available [here](#).

¹⁴⁰¹ UNICEF, Report on Analysis for Out-of-school Syrian Children Türkiye Country Report, July 2024, available [here](#).

¹⁴⁰² Heinrich Böll Stiftung, Göçmen Mahallelerinde Yaşam: Türkiye’de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı, November 2023, available [here](#).

¹⁴⁰³ Information provided by a stakeholder, March 2024.

¹⁴⁰⁴ Information provided by a stakeholder, June 2025

¹⁴⁰⁵ 3 RP Country Report 2023-2026.

¹⁴⁰⁶ Information provided by stakeholders, March-April 2024.

¹⁴⁰⁷ Information provided by stakeholders, March-April 2024.

¹⁴⁰⁸ Information provided by a stakeholder, April 2025.

¹⁴⁰⁹ Information provided by a stakeholder, March 2025.

¹⁴¹⁰ Information provided by a stakeholder, February 2025.

Instances of discriminatory behaviour in schools increased, particularly following developments in December 2024. Some school officials reportedly asked children when they would be leaving, contributing to an unwelcoming environment.¹⁴¹¹

Children with disabilities can be included in special education or integrated classes in schools¹⁴¹². Sometimes it can take a very long time to obtain a health report that proves their condition. In addition, due to reasons such as families having difficulty following up on the report, capacity problems in the schools they are referred to, lack of awareness on the part of the family, and transportation problems to school, it can take up to a year for them to access education.

To ensure children's access to the education system, another programme, Conditional Cash Transfer for Education (CCTE), was financed by ECHO and implemented through a close partnership between the Ministry of Family and Social Services, the Ministry of National Education, AFAD, Türk Kızılay and UNICEF. CCTE programme was handed over to the Government in 2022. The programme provides vulnerable refugee families with bimonthly cash payments to help them send and keep their children in school (see Social Welfare). Cash assistance is available only for persons who can submit the school registration documents to the social service units of the Ministry. A family can receive payment provided the child attends school regularly; a child should not miss school more than 4 days in one month.¹⁴¹³ According to Türk Kızılay, in cases where a child has not attended school for over 4 days, protection officers from 15 centres and 2 mobile protection centres around Adıyaman and Karadeniz region visit the family to identify the cause of absence; child labour, child marriage, peer bullying are the most common factors.¹⁴¹⁴ As of mid-2024, a total of 456,132 students benefitted from CCTE.¹⁴¹⁵ CCTE has mainly focused on primary school children. Families are compensated 90 TL (2.25 EUR) for boys and 100 TL (2.5 EUR) for girls attending kindergarten and primary school per month and 130 TL (3.25 EUR) for boys and 150 TL (3.75 EUR) per girls attending high school per month.

In addition, the PIKTES (Project on Promoting Integration of Syrian Kids into the Turkish Education System) is a European Union funded project implemented by the Turkish Ministry of National Education. In its third phase, the main objective of PIKTES + Project is to contribute to refugee children's access to education and social cohesion in Türkiye. In this context, supporting the efforts of the Ministry of National Education in order to increase enrolment, school attendance and transition to a higher level in the formal education system (from pre-school to the end of secondary education) for refugee children in 29 project provinces with a high refugee population density is among the specific objectives of the project. PIKTES Project, which started its third phase in January 2023, will continue until November 2025.¹⁴¹⁶

In the context of CCTE, a pilot programme for social integration in education has been implemented in Istanbul and Şanlıurfa with the assistance of the Maya Association, providing training on how to end bullying and violence in schools.¹⁴¹⁷ Bilingual videos to raise awareness on (cyber) bullying for caregivers are available in their website¹⁴¹⁸.

The Early Childhood Education Project, aimed at improving conditions that support early childhood development for Syrian children aged 3-6 and disadvantaged children in the host community, is being carried out under the protocol "Promoting Early Childhood Education for Syrian and Turkish Children" signed between the General Directorate of Lifelong Learning, the General Directorate of Basic Education, and the German International Cooperation Agency (GIZ)¹⁴¹⁹. The project equips pre-schools and public education centres with teaching materials and offers training courses for teachers, focusing on joint teaching for Syrian and Disadvantaged Turkish children. Additionally, it supports families, promotes

¹⁴¹¹ Information provided by a stakeholder, April 2025.

¹⁴¹² Information provided by stakeholders, March-April 2024.

¹⁴¹³ Ministry of Family and Social Services, 'Şartlı Eğitim (ŞEY) ve Şartlı Sağlık (ŞSY) Yardımı', available in Turkish [here](#).

¹⁴¹⁴ Toplum Merkezi, 'Toplum Merkezine Hoşgeldiniz', last accessed 13 July 2023, available in Turkish [here](#)

¹⁴¹⁵ EU Facility for Refugees in Türkiye, The Facility Results Framework Monitoring Report No. 13, December 2024, available [here](#).

¹⁴¹⁶ Piktes, 'about us', last accessed 13 July 2023, available [here](#).

¹⁴¹⁷ UNICEF, April 2022, Suriyeli ve Diğer Mülteciler için Şartlı Eğitim Yardımı (ŞEY) Programı, available [here](#).

¹⁴¹⁸ Maya Vakfı, Education Programmes, available [here](#).

¹⁴¹⁹ GIZ, 2023, Promoting early childhood education for Syrian and Turkish children, available [here](#).

parental involvement, developed a bilingual app, and is focused on reopening pre-schools and implementing compensatory measures for children affected by the earthquake. To facilitate access to education and social services for Syrian children, a Memorandum of Understanding was signed with UNICEF, resulting in recruitment of 1,112 personnel across 23 provinces under the Syrian Support Staff Program.

The impact of the earthquakes:

Access to education for refugee children in the earthquakes-affected zone presents a multifaceted challenge. Approximately 390,000 refugee and migrant children, among nearly 4 million children affected, grapple with disrupted learning opportunities across 11 provinces.¹⁴²⁰ 576 schools were destroyed or damaged due to the earthquakes.¹⁴²¹ The extensive devastation and displacement caused by the earthquakes, the subsequent reordering of government agencies' priorities, and the consequences for the regional economies—including the scarcity of contractors—all contributed to a major slowdown in the advancement of infrastructure projects.¹⁴²² However, the obstacles extend beyond the infrastructural problems; financial constraints, language barriers, transportation limitations, inactivated IDs, discrimination including peer bullying, and sanitation issues further impede access to quality education.¹⁴²³

Research indicates that 15% of families surveyed in the provinces reported withdrawing children from school or sending them to work as a strategy to cope with reduced income levels¹⁴²⁴. Coping mechanisms, including reduced food intake and decreased healthcare spending, underscore the severity of the situation¹⁴²⁵. Moreover, girls and boys are increasingly vulnerable to exploitation, with instances of child labour, and child marriages on the rise. The absence of school access, especially at the secondary level, significantly contributes to the increased rate of children dropping out¹⁴²⁶. Financial obligations often prompt boys to leave school to contribute to their families, while safety concerns lead parents to limit their daughters' access to schools. Furthermore, specialised education for refugee children with disabilities is extremely limited.¹⁴²⁷

Schools, particularly secondary and high school level, are still lacking in many of the settlements or the capacity of the schools is not sufficient to accommodate all the children living in these areas¹⁴²⁸. Early child care is very limited,¹⁴²⁹ NGOs provide some psychosocial supports to children. For instance, ASAM provides some activities for the pre-schoolers in the temporary settlement areas. These schools in the temporary settlement areas are segregated for Turkish and refugee, as the accommodation centres are segregated, which might have a long-term impact regarding the social cohesion.¹⁴³⁰

The geographical distance of the temporary shelters poses challenges for refugee families, who cannot afford transportation for their children to attend school and are apprehensive about their safety using public transport, consequently, the majority of school-age refugee children had no access to education,¹⁴³¹ especially for those high school aged children.¹⁴³² With the scope of mobile education, some schools provide transportation facilities, while others do not have this option available, this situation leads refugees to refrain from sending their children to school due to financial constraints or security concerns.¹⁴³³

¹⁴²⁰ UNICEF, 2024, UNICEF Türkiye Humanitarian Situation Report No. 19, 6 February – 31 December 2023.

¹⁴²¹ T.C. Cumhurbaşkanlığı Strateji ve Bütçe Başkanlığı – SBB, Türkiye Earthquakes Recovery and Reconstruction Assessment.

¹⁴²² EU support to refugees in Türkiye Monitoring Report: December 2023, available [here](#).

¹⁴²³ Information provided by stakeholdera, March – April 2024.

¹⁴²⁴ EU support to refugees in Türkiye Monitoring Report: December 2023, available [here](#).

¹⁴²⁵ UNICEF, 2024, UNICEF Türkiye Humanitarian Situation Report No. 19, 6 February – 31 December 2023.

¹⁴²⁶ Information provided by stakeholders, March – April 2024.

¹⁴²⁷ Kirkayak Kültür, February 2024, “We started from zero, we returned to zero again...”, available [here](#).

¹⁴²⁸ Türk Tabipleri Birliği & Sağlık ve Sosyal Hizmet Emekçileri Sendikası Şubat 2023 Depremleri 1. Yıl Raporu, 2024, available [here](#).

¹⁴²⁹ Information provided by stakeholders, March – April 2024.

¹⁴³⁰ Ibid.

¹⁴³¹ Kirkayak Kültür, February 2024, “We started from zero, we returned to zero again...”, available [here](#) Information provided by stakeholders, March – April 2024 & Information shared by refugees in focus group discussions, April 2024.

¹⁴³² Information provided by stakeholders, March – April 2024.

¹⁴³³ Information provided by stakeholders, March – April 2024.

Moreover, parents might feel afraid to go to school to talk with teachers, in case of any issues such as peer bullying due to the fear of deportation.¹⁴³⁴

In 2024, ASAM implemented the “Promoting the Rights of Earthquake-Affected Children in Hatay through the Children’s Solidarity Committee (CSC)” project in the Yayladağı Temporary Accommodation Center. The project aimed to reach over 600 beneficiaries, including children aged 7–18 and their families. It focused on promoting child participation in decision-making processes through the establishment of CSCs, targeting both asylum-seeking and host community children. Activities included needs assessments on access to fundamental rights, regular CSC meetings, awareness-raising sessions, collaboration with local institutions, and the distribution of “Child and Caregiver Kits.” Caregivers and local stakeholders were also engaged to support project implementation.¹⁴³⁵

According to the report of the Refugees Association (Mülteciler Derneği), many children were unable to continue their education because their city of registration differed from their current place of residence.¹⁴³⁶ Stakeholders confirmed that this problem continued in 2024.¹⁴³⁷

Refugee children displaced to different provinces due to the earthquake should be able to access education by obtaining a travel permit, but some schools do not accept their registration. Inconsistence implementation between cities, and even schools is observed.¹⁴³⁸

2.2. Higher education

Temporary protection beneficiaries also have the right to higher education in Türkiye. In order to apply and register with an institution of higher education, students are required to have completed either the 12 years of Turkish basic education or equivalent experience.

In Türkiye, admission to universities is subject to the requirement of taking a standardised university entrance examination and additional requirements by each university. Students who started their university studies in Syria but were not able to complete them, may request universities to recognise the credits (courses) that they have already completed. The decision whether to recognise courses passed in Syria is made by each university and may differ from one department to another.¹⁴³⁹ Sometimes there can be problems in the recognition of previous education including qualifications.

In total in the 2023-2024 academic year, 60,750 Syrian students (32,183 male, 27,657 female) were enrolled in Turkish Higher Education Institutions.¹⁴⁴⁰ As of 2024, a total of 17,379 Syrians have graduated from higher education institutions. Among current students, 5,806 are enrolled in associate degree programs, 9,223 in bachelor’s programs, 2,196 in master’s programs and 154 in doctoral programs. A new regulation was introduced in 2022, whereby foreign students have to pay a contribution fee for public higher education, including Syrian students and blue cardholders.¹⁴⁴¹ However, some universities¹⁴⁴² are listed “Syrian citizens who are placed in universities according to the principles determined by the Council of Higher Education” are among those who are exempt from tuition fees. Due to the financial barriers, accessing to private universities is an option for a few of Syrians. Students still needed to cover the costs of local transportation, books and living expenses. There are a number of organisations providing scholarships to Syrian students for higher education study in Türkiye. These organisations include: YTB, UNHCR through the DAFI scholarship programme, and NGOs (e.g. SPARK). Scholarships awarded through YTB and DAFI cover the costs of tuition and pay students a monthly allowance for accommodation and living expenses. UNHCR, in cooperation with the Presidency for Turks Abroad and Related

¹⁴³⁴ Information provided by refugees in focus group discussions, April 2024.

¹⁴³⁵ ASAM, Promoting the Rights of Earthquake-Affected Children in Hatay through the Children’s Solidarity Committee (CSC) Project, available [here](#).

¹⁴³⁶ Mülteciler Derneği, 6 Şubat 2023 Depremi Sonrası Mülteci Çocuklar için Eğitime Erişim Durum Tespit Raporu, 2024, available [here](#).

¹⁴³⁷ Information provided by a stakeholder, June 2025.

¹⁴³⁸ Information provided by stakeholders, March – April 2024.

¹⁴³⁹ UNHCR, *Education*, available [here](#).

¹⁴⁴⁰ Turkish government, official higher education statistics, available at: <https://istatistik.yok.gov.tr/>.

¹⁴⁴¹ For example, Pamukkale University, ‘Students of Syrian nationality and Blue Card holders, who have just started our university in the 2021-2022 Academic Year, will pay tuition fees’, available in Turkish [here](#).

¹⁴⁴² For example, Anadolu University, available [here](#).

Communities (YTB), continues to support access to higher education for Syrians under temporary protection through initiatives such as the Albert Einstein German Academic Refugee Initiative (DAFI) scholarship programme. The DAFI scholarship covers various expenses including tuition, registration, accommodation, transportation, and study materials. In addition, semester-based Higher Education Cash Grants (HECG) are provided to eligible students enrolled in Turkish universities. As availability may vary annually, students are encouraged to regularly consult the websites and social media accounts of YTB and UNHCR Help for updates, and to consider applying for the Türkiye Scholarships programme as an alternative.¹⁴⁴³ There is a scholarship programme launched by ICMPD with EU funding, BEURS, a project aiming to enhance higher education access and employment opportunities for Syrian students under temporary protection, students under international protection and students from the host community in Türkiye. It provides scholarship support, focuses on gender mainstreaming, disability inclusion, and partnerships between universities, municipalities, government institutions, and international organizations. The programme is expected to remain active until January 2026.¹⁴⁴⁴

Temporary protection beneficiaries, regardless of their age, can also benefit from free of charge language education courses as well as vocational courses offered by Public Education Centres structured under each Provincial Directorate of National Education. Some NGOs and institutions also provide free language courses and vocational courses to temporary protection beneficiaries in some localities. For example, Anadolu University provides free online Turkish courses for beginners (A1) and elementary students (A2). They are open to anyone who wants to learn Turkish. The Yunus Emre Institute (YEI) offers online Turkish courses ranging from beginner (A1) to advanced (C1). Since its courses are adaptable, the YEI's 'Distance Turkish Instruction Portal' allows students to learn Turkish at their own speed and from wherever they are.¹⁴⁴⁵

F. Social welfare

The law draws no distinction between temporary protection beneficiaries and applicants for and beneficiaries of international protection in relation to social assistance (see [Forms and Levels of Material Reception Conditions](#)).

Cash assistance programmes implemented mainly by Türk Kızılay through a dedicated bank card (*Kızılaykart*), have focused mainly, though not exclusively, on temporary protection beneficiaries. These include the following:

- **Emergency Social Safety Net (ESSN):** The EU-funded ESSN programme was launched on 28 November 2016 by the World Food Programme, Türk Kızılay and the Ministry of Family and Social Services, under the coordination of AFAD.¹⁴⁴⁶ The programme has now been handed over to the DG NEAR from DG ECHO, in line with the EU humanitarian-development-peace nexus approach. Applicants for international protection and temporary protection beneficiaries fall within the scope of this programme.

In the context of the ESSN, the Kızılay Food Card offers a smart card technology developed for people in need to meet all their needs at food stores. International protection applicants who hold a YKN go to the one of the 1,003 Social Assistance and Solidarity Foundations of their province of residence or 9 service centres of Türk Kızılay and fill in an application form for a *Kızılaykart*. After 5-9 weeks, applicants can receive their cards ready to use from the contracted bank.¹⁴⁴⁷

Eligibility criteria for receiving the ESSN are have a foreigner's identification number starting with 99, being single women between the ages of 18 and 59, single seniors aged, single parents or single fathers with at least one child under the age of 18, families with one or more disabled

¹⁴⁴³ UNHCR, *Education*, available [here](#)

¹⁴⁴⁴ ICMPD, 'BEURS:', last accessed 13 July 2023, available [here](#)

¹⁴⁴⁵ UNHCR, 'Education', last accessed 13 July 2023, available [here](#)

¹⁴⁴⁶ European Commission, 'European Civil Protection and Humanitarian Aid Operations', last updated in 2023, available [here](#)

¹⁴⁴⁷ *ibid.*

individuals with a disability level of 40% or more (disability status must be documented with a disability report to be obtained from the authorized state hospital), families with more than 4 children, families with a large number of dependents (children, elderly, disabled) (this criterion is determined by the proportion of 1.5 or more dependents per healthy adult (18-59 years old) in the family)¹⁴⁴⁸. A monthly allowance is 500 TL (12.5 €) per family member through the *Kızılaykart*.¹⁴⁴⁹

The ESSN scheme is the single largest humanitarian project in the history of the EU. As of May 2025, 2.3 billion EUR were distributed, 995,742 people and 215,606 householders were being reached.¹⁴⁵⁰ Among the beneficiaries of this programme majority (1.1 millions) are Syrians, and other main groups are Afghanistan, Iraq and Iran nationals. As reported from a stakeholder, Ukrainians under international protection have benefitted from ESSN programme.¹⁴⁵¹

Considering that the net minimum wage is 17.002 TL¹⁴⁵² (around 485 EUR), the hunger threshold is 19,830 TL and the poverty threshold is 64,595 TL,¹⁴⁵³ the monthly payments are far from covering the needs for a dignified life, which is not the main purpose of the programme.

- **Complementary Emergency Social Safety Net (C-ESSN):** From 2021 this programme has provided additional support for the most vulnerable people receiving ESSN who cannot be referred to livelihood programmes. It supports them to access basic needs. As of May 2025, 334,719 people and 73,116 householders were receiving support, for an amount of 700 TL (17.5 EUR) per month.¹⁴⁵⁴
- **In-Camp Food Assistance Programme:** This programme which is funded by the United States Agency for International Development, and implemented in cooperation with Türk Kızılay and the WFP, provides assistance to refugees residing in 6 Temporary Accommodation Centres. People receiving assistance receive e-vouchers for the monthly per capita aid (425 TL /10.5 EUR) that they can use for food and non-food shopping inside the camp via the Kızılay Card. As of May 2025, 31,559 people were benefiting from it.¹⁴⁵⁵ Majority of beneficiaries are Syrians, other top 3 nationalities are Ukraine, Iraq, and Russia.
- **Conditional Cash Transfer for Education (CCTE):** The EU-funded programme CCTE aims to support refugee families in sending their children to school (see Access to Education) by providing bimonthly payments. The amounts disbursed on a bimonthly basis vary depending on the level of education and gender. The CCTE is being disbursed to 360,293 beneficiaries and 194,354 householders as of May 2025.¹⁴⁵⁶ CCTE has mainly focused on primary school children.¹⁴⁵⁷ It is 90 TL (2.25 EUR) for boys and 100 TL (2.5 EUR) for girls attending kindergarten and primary school per month and 130 TL (3.25 EUR) for boys and 150 TL (3.75 EUR) per girls attending high school per month.¹⁴⁵⁸

According to stakeholders, the Accelerated Learning Project (ALP) was discontinued in 2024.¹⁴⁵⁹

There is a serious gap in the legal regulations of municipalities, which are local government units, for Syrian refugees. Metropolitan Municipality Law No. 5216 and Municipal Law No. 5393 do not contain any financial and technical regulations for the areas of providing services and assistance to refugees. This situation

¹⁴⁴⁸ Multeci-der, SUY, available [here](#).

¹⁴⁴⁹ *Ibid*.

¹⁴⁵⁰ Kızılaykart, 'Monthly ESSN Programme Infographics, 2025, available [here](#).

¹⁴⁵¹ Information provided by a stakeholder, June 2023.

¹⁴⁵² T.C. Çalışma ve Sosyal Güvenlik Bakanlığı | Asgari Ücret, available [here](#).

¹⁴⁵³ Türk-İş, Eylül 2024 Açlık ve Yoksulluk Sınırı, 30.09.2024 available [here](#).

¹⁴⁵⁴ Kızılaykart, 'Monthly C-ESSN Programme Infographics, 2025, available [here](#).

¹⁴⁵⁵ Kızılaykart, Monthly in Camp Programme Infographics, May 2025 available [here](#).

¹⁴⁵⁶ Kızılaykart, Monthly CCTE Project Infographics, May 2025, available [here](#).

¹⁴⁵⁷ *Ibid*.

¹⁴⁵⁸ *Ibid*.

¹⁴⁵⁹ Information provided by a stakeholder, May 2025

leaves the decision of the municipalities to help and provide services to foreign citizens, especially Syrians, living within their borders, to the initiatives of the municipalities.¹⁴⁶⁰

G. Health care

1. Conditions for health care

All registered temporary protection beneficiaries, whether residing in the camps or outside the camps, are covered under Türkiye's General Health Insurance (GHI) scheme and have the right to access health care services provided by public health care service providers.¹⁴⁶¹ The health care services are no longer free of charge following a legal amendment of 25 December 2019 and they have to pay a contribution fee determined by the Ministry of Interior Affairs to access primary and emergency health care services and medicines.¹⁴⁶² This does not apply to vulnerable groups. The practice of contribution fees is different in each province with no uniform application. Reimbursement is not foreseen in the law.

Persons who are eligible for temporary protection but have not yet completed their registration have only access to emergency medical services and health services pertaining to communicable diseases as delivered by primary health care institutions.

Temporary protection beneficiaries are only entitled to access health care services in the province where they are registered. However, where appropriate treatment is not available in the province of registration or where deemed necessary for other medical reasons, the person concerned may be referred to another province.¹⁴⁶³

The "income test" to assess means classifies the beneficiary according to the level of income. Persons in the "G0" class have health care premiums covered entirely, while individuals in categories "G1", "G2" and "G3" proportionally cover some of their health care costs.¹⁴⁶⁴

1.1. Scope of health care coverage

Under the Turkish health system, differentiation is made among primary, secondary and tertiary public health care institutions. Health stations, health centres, maternal and infant care and family planning centres and tuberculosis dispensaries that exist in each district in each province are classified as primary healthcare institutions. State hospitals are classified as secondary health care institutions. Research and training hospitals and university hospitals are classified as tertiary health care institutions.

Temporary protection beneficiaries are entitled to spontaneously access initial diagnosis, treatment and rehabilitation services at primary health care institutions. These providers also undertake screening and immunisation for communicable diseases, specialised services for infants, children and teenagers as well as maternal and reproductive health services.

Temporary protection beneficiaries are also entitled to spontaneously approach public hospitals in their province. Their access to medical attention and treatment in university and research and training hospitals, however, is on the basis of a referral from a state hospital.¹⁴⁶⁵ In some cases, state hospitals may also refer a beneficiary to a private hospital, where appropriate treatment is not available in any of the public

¹⁴⁶⁰ Akyıldız, Ş., Kenanoğlu, M., Güven, S., Kurt, T., Doğanay, C., Kadkoy, O. for TEPAV (Turkish Economic Policy Research Foundation of Türkiye), Supply and Demand-Side Analysis of Syrians in the Labour Market, February 2021, available in Turkish [here](#). Page 66.

¹⁴⁶¹ Article 27 TPR.

¹⁴⁶² Article 27(1)b as amended by Regulation no.30989.

¹⁴⁶³ Selin Siviş, 'Who is (un)deserving? Differential healthcare access and the interplay between social and symbolic boundary-drawing towards Syrian refugees in Turkey', 2021, available [here](#)

¹⁴⁶⁴ isvesosyalguvenlik, 'Gelir Testinde G0 – G1 – G2 – G3 Ne Demek ?', 2018, available [here](#)

¹⁴⁶⁵ Selin Siviş, 'Who is (un)deserving? Differential healthcare access and the interplay between social and symbolic boundary-drawing towards Syrian refugees in Turkey', 2021, available [here](#)

healthcare providers in the province. In such a case, the private hospitals are compensated by the GHI scheme and the beneficiary is not charged.

As a rule, referrals to university hospitals and private hospitals are only made for emergency and intensive care services as well as burn injuries and cancer treatment. This is confirmed in practice in various cities where temporary protection beneficiaries cannot access the research and training hospitals without a medical doctor referral. Costs are not covered by the State promptly, however.¹⁴⁶⁶

97 million medical services, more over 3 million inpatient treatments, and 2.6 million procedures were delivered to Syrian beneficiaries in primary, secondary, and tertiary public health institutions up until March 2022. In addition, 754,000 Syrian babies were born in these public health institutions.¹⁴⁶⁷ Among foreign women who had children in 2024, Syrian mothers were in the first place with 7,546 babies.¹⁴⁶⁸

Temporary protection beneficiaries' access to secondary and tertiary health care services is conditional upon whether the health issue in question falls within the scope of the Ministry of Health's Health Implementation Directive (SUT). For treatment of health issues which do not fall within the scope of the SUT or for treatment expenses related to health issues covered by the SUT, which however exceed the maximum financial compensation amounts allowed by the SUT, beneficiaries may be required to make an additional payment.

Free health care coverage for registered temporary protection beneficiaries also extends to mental health services provided by public health care institutions. A number of NGOs are also offering a range of psychosocial services in some locations around Türkiye with limited capacity. For instance, Türk Kızılay runs community centres providing services on health and protection. (Find more information in [Reception Conditions: Healthcare](#))

With EU funding, in the frame of the "Improving the Health Status of the Syrian Population under Temporary Protection and Related Services Provided by Turkish Authorities" (SIHHAT-1) and (SIHHAT-2) projects, 190 Migrant Health Centres (*Göçmen Sağlığı Merkezi*) were established for migrants, especially targeting Syrian beneficiaries of temporary protection in 32 provinces. Syrians can approach these centres as primary health care institutions. Migrant Health Centres employ 4,000 staff including 787 Syrian doctors, 1149 nurses, 34 dentists.¹⁴⁶⁹ The EU-funded SIHHAT project supported and developed primary health care services to increase access to health services. The project mainly focuses on reproductive health, mental health and psychosocial support, immunization, mobile health services, cancer screening, and health literacy training. In 51 Migrant Health Centres; in addition to primary health care services, internal medicine, gynaecology and obstetrics, paediatrics, oral and dental health services, laboratory, x-ray and psychosocial support services are also provided under the Strengthened Migrant Health Center structure. 10 Community Mental Health Centres and over 100 hospitals offer healthcare solutions in migrants' native languages, with 4,000 health workers¹⁴⁷⁰. In 2022, over 7 million primary healthcare consultations were conducted in these facilities. Between 2017 and October 2023, these centres provided more than 33 million medical consultations and 9 million doses of vaccine were administered in these centres. The project also improved health infrastructure by constructing two new state hospitals in Dört Yol Hatay and Kilis.¹⁴⁷¹ The implementation of SIHHAT II ended at the beginning of 2024. SIHHAT III ensures that refugee healthcare services continue thanks to additional EU support of EUR 210 million.¹⁴⁷²

In addition, the "Strengthening Health Care Infrastructure for All (SHIFA)" project aims to construct migrant health centres and provide medical equipment, maternity, health kits and capacity building with EUR 90

¹⁴⁶⁶ Information provided by a stakeholder, May 2023.

¹⁴⁶⁷ Ministry of Health, 'Avrupa Bölgesi Göç ve Sağlık Yüksek Düzeyli Toplantısı İstanbul'da Gerçekleştirildi', March 2022, available in Turkish [here](#).

¹⁴⁶⁸ TÜİK, Doğum İstatistikleri, 2024, available [here](#).

¹⁴⁶⁹ AA, 'Bakan Koca: Ayrım yapmaksızın göçmenlerin sağlık ihtiyacına ilişkin ortak bir yol izlemek hepimizin asli görevi', 17 March 2023, available in Turkish [here](#).

¹⁴⁷⁰ Sihhat Project, *Instagram*, available [here](#).

¹⁴⁷¹ European Commission, Türkiye 2023 Report, 8.11.2024, available [here](#).

¹⁴⁷² EU Monitor, Legal provisions of COM(2024)593 - Eighth Annual Report of the Facility for Refugees in Türkiye, 19.12.2024, available [here](#).

millions of support.¹⁴⁷³ The project plans the construction or rehabilitation of primary health care facilities in 120 different locations across the country, with a significant focus to the earthquakes-affected zone. The fourth steering committee meeting was held in July 2023.¹⁴⁷⁴

In addition, NGOs have operated projects aimed at enhancing vulnerable groups' access to health care. Doctors of the World (DDD) has been actively providing emergency response in Türkiye and northwest Syria from the onset of the earthquake.¹⁴⁷⁵ Supported by the MdM International Network, they have delivered comprehensive healthcare services, including primary health care, medicine distribution, sexual and reproductive health care, dignity and hygiene kits, mental health and psychosocial support, protection, case management, and support for secondary health care facilities. DDD has also operated mobile medical units for hard-to-reach areas and established a women and child-friendly safe space to assist the most vulnerable populations¹⁴⁷⁶. DDD implemented several projects in the affected areas in collaboration with international organisations:

A post-emergency response and reconstruction project which is funded by Agence française de Développement (AFD) and Fondation de France, started at the beginning of January 2024 aims to assist populations in Hatay province affected by the February 2023 earthquakes. The ongoing project focuses on providing primary health services, protection, and psychosocial support to the most vulnerable groups. Initially, DDD will deliver emergency response through mobile teams and "safe spaces" for confidential consultations, ensuring access to hard-to-reach areas. In the second phase, the project will transition to post-emergency response, incorporating capacity-building activities to gradually transfer services to local authorities.¹⁴⁷⁷

Within the scope of a partnership between UNFPA Türkiye and DDD, another project on Provision of Sexual and Reproductive Health (SRH) services through Mobile SRH Medical Teams in Hatay Türkiye was implemented between July 2023 and December 2023. The project offered both static and mobile sexual and reproductive health (SRH) services to the most vulnerable women and girls in Hatay province, including refugees, pregnant women, and lactating mothers¹⁴⁷⁸.

Funded by IOM and PRM, DDD implemented a humanitarian project on primary healthcare services through Mobile Medical Units (MMUs) in Hatay province to restore the pre-earthquake healthcare system by deploying mobile medical teams to remote areas lacking regular access to primary healthcare. The project's objectives were to provide timely and life-saving health and nutrition assistance to earthquake-affected populations, enhance community resilience, and support the rapid resumption of essential health services in underserved communities. The project included triage, outpatient consultations, management of communicable and non-communicable diseases, maternal and child health, nutrition services, immunizations, referrals, and health education.¹⁴⁷⁹

Another project aimed to enhance the resilience of earthquake-affected communities in Türkiye by improving their physical and psychological health, particularly focusing on women and children. In response to mass displacement from cities like Antakya and Iskenderun to rural areas with less damage, DDD deployed mobile medical units (MMUs) to hard-to-reach locations and new displaced camps. These MMUs, comprising medical and support personnel, provided medical screenings, psychosocial support, and various health services. Key activities included primary healthcare consultations, sexual and reproductive health services, antenatal and postnatal care for pregnant and lactating women, and other essential nursing services¹⁴⁸⁰.

According to a report of Doctors of the World (DDD), seven months after the earthquake, the affected population's needs remain high while international funding is decreasing. A doctor from the organization,

¹⁴⁷³ CEB, CEB approves € 250 million loan to the Republic of Türkiye and establishes Disaster Prevention and Recovery Fund, 24 April 2023, available [here](#).

¹⁴⁷⁴ Ministry of Health, '4th Steering Committee Meeting of SHIFA Project', 11.07.2023 available [here](#).

¹⁴⁷⁵ DDD, DEPREMLERDEN 1 YIL SONRA: TRAVMA HALA BİZİMLE, available [here](#).

¹⁴⁷⁶ Doctors of the World Türkiye Programme, available [here](#).

¹⁴⁷⁷ Doctors of the World, Earthquake Response Projects, available [here](#).

¹⁴⁷⁸ Ibid.

¹⁴⁷⁹ Ibid.

¹⁴⁸⁰ Ibid.

highlights that limited funds are their biggest challenge. Despite this, mobile health units have served around 15,000 people in four months. The organization lost four staff members in the quake but provided psychological and gynaecological services, anticipating 25,000 births in affected areas. To date, DDD has conducted over 16,000 medical examinations, supplied medication to 92% of patients, with 63% women and 25% refugees among those served. DDD now co-leads the Health Coordination Group alongside the WHO due to its effective earthquake response.¹⁴⁸¹

1.2. Medication costs

According to SUT, persons covered by the general health insurance scheme are expected to contribute 20% of the total amount of the prescribed medication costs. The same rule also applies to temporary protection beneficiaries, while the rest was previously covered by AFAD.

Healthcare-related expenditures for Syrians under temporary protection remain a common topic of public debate in Türkiye. The PMM publicly released its 2024 Institutional Financial Status and Expectations Report via its official website. The report includes details about the activities of the Directorate General of International Protection, which is responsible for managing operations under the Temporary Protection Regulation in Türkiye. A total of 10.73 billion Turkish Lira (TRY) was allocated to the Directorate for the 2024 fiscal year as an initial budget. The report states that the Directorate General will request an additional appropriation of approximately 3.61 billion TRY.¹⁴⁸²

Separately, Turkish Minister of Health Kemal Memişoğlu addressed recent claims circulating on social media regarding the construction of a dedicated obstetrics and pediatric hospital for Syrians in Konya. Referring to statements by Konya Provincial Health Director Prof. Dr. Mehmet Koç, Minister Memişoğlu clarified that the claims are misinformation and do not reflect the truth.¹⁴⁸³

According to both the Activity Report and the Strategic Plan of PMM, measures are planned to reduce the cost of medication for beneficiaries of temporary protection.¹⁴⁸⁴ According to the Strategic Plan, in line with the provision of the Temporary Protection Regulation allowing for the collection of contributions, it is planned to determine the amount and ensure its implementation. It is also foreseen to refer unregistered Syrians to TACs and to introduce necessary amendments to the relevant legislation.

2. Obstacles to access in practice

Syrians with temporary protection registrations in different provinces face several limitations in accessing the public health system.¹⁴⁸⁵ These individuals are required to pay for their medications. Increased measures to check IDs and control refugee movements have heightened fears of leaving their homes to access healthcare or psychosocial support from NGOs. Previously, they could use migrant health centres even without an active ID, but now many avoid leaving their homes, due to the increased police control, hindering their access to health services.¹⁴⁸⁶

In some provinces, the petitions for the injunction decision to access healthcare for children submitted by parents without active IDs are not accepted, blocking their access to court services and healthcare. While efforts are made to ensure healthcare access for children and those with chronic illnesses, obtaining health reports for children and adults with disabilities can take a long time, and families struggle to keep up with the process¹⁴⁸⁷. Finding appointments can also be challenging.

¹⁴⁸¹ DDD, DÜNYA DOKTORLARI, YIKICI DEPREMİN ARDINDAN TÜRKİYE'DE VE SURİYE'DE DAYANIŞMAYI BÜYÜTÜYOR, available [here](#).

¹⁴⁸² Sputnik Türkiye, Geçici koruma statüsündeki Suriyelilere sağlık giderleri için 3.5 milyarlık ek bütçe istendi, 01.08.2024, available [here](#).

¹⁴⁸³ Sputnik Türkiye, Sağlık Bakanı, Konya'da Suriyelilere özel bir hastane yapılacağı iddialarına yanıt verdi, 27.09.2024, available [here](#).

¹⁴⁸⁴ PMM, Faaliyet Raporu 2024; PMM, Stratejik Plan 2024-2028.

¹⁴⁸⁵ Information provided by stakeholders, March - April 2024.

¹⁴⁸⁶ Information provided by a stakeholder, March 2024.

¹⁴⁸⁷ Information provided by a stakeholder, May 2023.

The language barrier is one of the primary obstacles temporary protection recipients face when attempting to access health care services. Although interpreters are available in some public health institutions, such services are unavailable in the majority of health care facilities. There have been also reports of translators and interpreters not translating the patient's complaints and making fun of them.¹⁴⁸⁸ The fact that Turkish hospitals schedule patients over the phone presents a significant practical barrier for refugees. Foreign nationals require the assistance of a Turkish speaker at the appointment stage, as hospital appointment call centres do not serve prospective patients in any language other than Turkish.¹⁴⁸⁹ In 2024, this problem persisted. Although individuals could sometimes secure appointments with help from neighbours or Turkish-speaking children, the real challenge began at hospitals. As city (şehir) hospitals are very large, the number of interpreters available was insufficient. As a result, individuals often had to hire translators on an hourly basis even for medication-related services, creating an additional barrier to accessing healthcare.¹⁴⁹⁰

The Ministry of Health operates a free hotline that provides limited distance interpretation services to temporary protection beneficiaries, doctors and pharmacists. However, the hotline does not provide any general counselling to beneficiaries about the healthcare system or assistance in obtaining appointments at hospitals.

Seasonal agricultural workers, particularly in İzmir (Torbalı), suffer from poor living conditions, lacking hygiene. Some of them may be reluctant to access hospitals because they are not registered in the province they work in. This situation especially causes delays in vaccinations, and increases in scabies cases.¹⁴⁹¹ In 2023, two mobile medical units from Médecins du Monde Türkiye delivered primary health care and sexual and reproductive health services to 4,000 Syrian seasonal workers in the rural areas within the scope of the project "*Provision of health protection and resilience of at-risk Syrians and undocumented migrants*".¹⁴⁹² These services included preventive and curative care for common illnesses and postnatal care.

People who entered Türkiye from Syria with an emergency travel document can be referred to hospitals in Istanbul after arriving through Hatay or Kilis, especially following the earthquake. However, this referral needs to be renewed periodically, requiring them to return to their initial entry point. This process poses challenges as they may face health problems or have childcare responsibilities that hinder their ability to travel¹⁴⁹³. Additionally, they incur medical expenses that cannot be covered due to a lack of social security, and it is difficult to find institutions that will cover these costs. Without access to their ID, they are expected to receive treatment and then return. As a result, some may choose to return to their home country. In 2024, this practice worsened. Individuals holding emergency travel documents were required to return to border gates to renew their documents, despite receiving medical treatment in provinces far from the border and having severe medical conditions. Stakeholders reported significant communication gaps between different PDMM offices and between PDMMs and hospital administrations, causing considerable hardship for affected individuals. In one case, a person with a severe respiratory condition had to travel from Adana to Hatay to renew their document. Upon arrival at the border, they were informed they had missed the renewal deadline and were required to exit the country and re-enter. Unable to complete the procedure and continue treatment, the individual ultimately left Türkiye permanently without finishing their medication.¹⁴⁹⁴

Vulnerable and marginalised groups, such as sex workers, face greater obstacles to accessing services, such as information on sexual health, due to the fact that they perform sex work informally, frequently through intermediaries – who, in some instances, are perpetrators of discrimination and violence – and under harsh working conditions. Since 2018, UNFPA has provided multiple services to sex workers,

¹⁴⁸⁸ Information provided by a stakeholder, May 2023.

¹⁴⁸⁹ Information provided by a stakeholder, May 2023; Çağla Aydın, 'Boğaziçi Üniversitesi Sosyal Politikalar Forumu Üyesi Nihal Kayalı: "Türkiye'nin Suriyeli mülteciler için sağlık çalışmaları övgüye değer ama problemler de var"', 2022, available in Turkish [here](#).

¹⁴⁹⁰ Information provided by a stakeholder, June 2025

¹⁴⁹¹ Information provided by a stakeholder, March 2024.

¹⁴⁹² Dünya Doktorları, 2023, Provision of health protection and resilience of at-risk Syrians and undocumented migrants in Turkey, available [here](#)

¹⁴⁹³ Information provided by a stakeholder, March 2024.

¹⁴⁹⁴ Information provided by multiple stakeholders, February and June 2025.

LGBTQ+, and persons living with HIV, without any partner organizations since June 2024, in five cities.¹⁴⁹⁵ The regulation on charging a contribution rate to Syrians refugees imposes a serious barrier to access to health but it is rarely applied to vulnerable groups.¹⁴⁹⁶

Migrant Health Centres provide services to those having no IDs and protection. However, in practice, undocumented refugees have to wait until their health condition becomes very serious before they can access free healthcare services. Some cases reported that those who cannot afford to pay medical expenses are being reported to the police or the hospital confiscates their passports until they pay.¹⁴⁹⁷

A research¹⁴⁹⁸ identified the most significant barriers to accessing mental health services as language difficulties and a lack of information about available services, and service providers and policymakers echoed these concerns, citing low awareness of mental health issues, daily living challenges, and language and cultural barriers as key obstacles. Another study¹⁴⁹⁹ also included other major challenges in accessing healthcare such as discrimination, and stigmatization, despite these issues, they reported satisfaction with the mental health services, particularly psychiatric nursing care.

Challenges faced by children with disabilities, particularly after the earthquake, include limited access to special education and services, fees to access education services, lack of participation in decision-making and policy implementation, and limited targeted programming.¹⁵⁰⁰

The impact of the earthquakes:

Around 7000 TPB lost their lives, and around 4000 were injured.¹⁵⁰¹ According to Turkish authorities, more than 2,306 bodies were sent to Syria from the border within the first 10 days after the earthquake.¹⁵⁰²

After the earthquake, the healthcare system was significantly affected due to damaged hospitals, loss of personnel, a high number of injured individuals, and increased health problems caused by the disaster. The earthquakes caused trauma and directly impacted the health of people living in the area. Refugees face numerous challenges due to their status or lack of active ID cards. There has been a noticeable increase in the number of disabled individuals, leading to difficulties in accessing healthcare services. Refugees with disabilities face specific challenges, such as difficulties accessing physical therapy centres and issues faced particularly by children using prostheses, as it requires frequent adjustments in the prostheses.¹⁵⁰³ Services for persons with disabilities are severely lacking, heightening their vulnerability.¹⁵⁰⁴

Refugees living in accommodation centres encounter physical barriers in reaching hospitals, exacerbated by the distance of these centres from city centres and the financial strain of public transport.¹⁵⁰⁵ Additionally, inadequate hygiene, clean water, and food in camps pose significant health risks for residents. In urgent health situations, such as cancer or pregnancy, hospitals still require an active ID, creating additional barriers for refugees in the region. To activate their IDs, the provincial immigration administration demands a health report. However, to obtain this health report, they need an active ID, which further complicates

¹⁴⁹⁵ UNFPA, The Key Refugee Groups (KRG) Project continues service provision through 5 Service Units for the furthest behind, 14.08.2024, available [here](#).

¹⁴⁹⁶ Information provided by a stakeholder, May 2023.

¹⁴⁹⁷ Information provided by a stakeholder, May 2023.

¹⁴⁹⁸ Kiliç C, Kaya E, Karadağ Ö, Üner S. Barriers to Accessing Mental Health Services Among Syrian Refugees: A Mixed-Method Study. *Türk Psikiyatri Derg.* 2024 Summer;35(2):87-94. doi: 10.5080/u27044.

¹⁴⁹⁹ Öztürk et al, 2023, "Syrian refugees' experiences while receiving mental health services and psychiatric nursing care: A qualitative study" *Journal of Advanced Nursing*, 80 (4).

¹⁵⁰⁰ Ulusal Koruma Çalışma Grubu, Ortak 3RP Koruma Sektörü Çalıştayı, 2-3 Ağustos 2023 & Information shared by a stakeholder in April 2024.

¹⁵⁰¹ AA, 2023. "Bakan Soylu: 11 Bölgede 57 Bin Enkazın 50 Bini Bitti." 22 April 2023, available [here](#), & Information provided by a stakeholder, April 2024

¹⁵⁰² BBC News, Kahramanmaraş depremi: Türkiye'deki Suriyeli depremzedeler yakınlarının cenazelerini Suriye'ye gönderiyor - BBC News Türkçe, available [here](#)

¹⁵⁰³ Information provided by a stakeholder, April, 2024.

¹⁵⁰⁴ Ibid.

¹⁵⁰⁵ Kirkayak Kültür, February 2024, "We started from zero, we returned to zero again...", available [here](#).

access to healthcare. The same issue arises when obtaining a disability report for refugees. In cases of extreme urgency, such as pregnancy, with the support of NGOs, refugees manage to access healthcare.¹⁵⁰⁶

Under the scope of “Project Facilitating Health Services to Earthquake Victims in Türkiye” implemented by ASAM, in the provinces affected by the earthquake, particularly Hatay, primary healthcare services are provided in Container Health Clinics and Mobile Health Clinics. Within the scope of the project, support for container clinics is provided to ensure the supply of all medical consumables and the proper storage of materials in healthy conditions¹⁵⁰⁷. Médecins du Monde Türkiye implements similar project through their mobile service units and at least 10,000 services were provided between January-April 2024, including primary health care, sexual and reproductive health, mental health and psychosocial support.¹⁵⁰⁸ In collaboration with Relief International, MUDEM assists people with disability in Malatya, by providing wheelchairs, walking aids, glasses, hearing devices, and other medical needs.¹⁵⁰⁹

Within the framework of the EU-supported "Sihhat" project, there are 2 Syrian doctors (1 General Practitioner, 1 Gynaecologist), 2 Syrian nurses, and 1 Turkish dentist working in the Temporary Shelter Center in Adıyaman. Additionally, psychosocial support activities are carried out in the field (with personnel support provided in Adıyaman Center and Kâhta District, as well as in Besni and Gölbaşı districts).¹⁵¹⁰ Accessing to basic health care in the temporary shelter areas is very crucial, especially for vaccinations, pregnancy etc., and due to the transportation problems.

H. Guarantees for vulnerable groups

As with the LFIP, the TPR also contains definitions of “persons with special needs” and “unaccompanied children” and provides for additional guarantees. According to Article 3 TPR, “unaccompanied minors, persons with disability, elderly, pregnant women, single parents with accompanying children, victims of torture, sexual assault or other forms of psychological, physical or sexual violence” are to be categorised as “persons with special needs”.

The TPR and other related secondary legislation providing the legal framework and procedures for the provision of services to temporary protection beneficiaries identify the Ministry of Family and Social Services as the responsible authority for “persons with special needs”.

As provided by the AFAD Circular 2014/4 on “Administration of Services to Foreigners under the Temporary Protection Regime”, “services such as accommodation, care and oversight of unaccompanied minors, persons with disabilities and other persons with special needs are the responsibility of the Ministry of Family and Social Services. The Ministry is responsible for the referral of vulnerable persons to children centres, women shelters or other appropriate places.”

Being identified and registered as a “person with special needs” entitles beneficiaries to additional safeguards and prioritised access to rights and services. They should be provided “health care services, psycho-social assistance, rehabilitation and other support and services free of charge and on priority basis, subject to the limitations of capacity.”¹⁵¹¹

1. Unaccompanied children under temporary protection

Article 3 TPR defines an “unaccompanied minor” as “a child who arrives in Türkiye without being accompanied by an adult who by law or custom is responsible for him or her, or, a child left unaccompanied after entry into Türkiye, provided that he or she did not subsequently come under the active care of a responsible adult”.

¹⁵⁰⁶ Information provided by stakeholders, March - April, 2024.

¹⁵⁰⁷ ASAM, Türkiye'deki Depremzedelere Sağlık Hizmeti Sunulmasının Kolaylaştırılması Projesi – SGDD-ASAM, available [here](#)

¹⁵⁰⁸ DDD, LinkedIn, available [here](#)

¹⁵⁰⁹ Information provided by a stakeholder, April 2024.

¹⁵¹⁰ Türk Tabipleri Birliği & Sağlık ve Sosyal Hizmet Emekçileri Sendikası Şubat 2023 Depremleri 1. Yıl Raporu, 2024, available [here](#)

¹⁵¹¹ Article 48 TPR.

Türkiye is a party to the Convention on the Rights of the Child and domestic child-protection standards are generally in line with international obligations. According to Turkish Law, unaccompanied children, once identified, should be taken under state protection with due diligence under the authority of the Ministry of Family and Social Services.

Article 48 TPR provides that unaccompanied children shall be treated in accordance with relevant child protection legislation and in consideration of the “best interests” principle. The 2015 Ministry of Family and Social Policies Directive on Unaccompanied Children provides additional guidance regarding the rights, protection procedures and implementation of services for unaccompanied children. The Directive designates PDMMs as the state institution responsible for the identification, registration and documentation of the unaccompanied children. PDMMs are also entrusted the responsibility of providing shelter to unaccompanied children until the completion of the age assessment, health checks and registration, documentation procedures upon which the child is referred to the Ministry of Family and Social Services.

Once the PDMM refers the child to the relevant Provincial Ministry of Family and Social Services Child Protection Directorate, temporary protection beneficiary unaccompanied children aged 0-12 are to be transferred to a child protection institution under the authority of the Ministry of Family and Social Services.

According to the TPR, unaccompanied children are mainly housed in Ministry of Family and Social Services shelters but may also be placed in Temporary Accommodation Centres if appropriate conditions can be ensured.¹⁵¹² In practice, unaccompanied children between the ages of 0-18 are transferred to the nearest Provincial Child Protection Directorate. These children are not only Syrians, but include children from Afghanistan, Iraq, Somalia and South Africa. The Ministry has established child protection centres for unaccompanied children, but the number of unaccompanied children placed in these institutions has not been made public.¹⁵¹³

The psychosocial well-being of Syrian children in Türkiye has been visibly impacted from the traumatic effects of war and flight, as well as deprivation, lack of opportunities for social interaction, and limited access to basic services. According to academic research conducted in 2022 and 2023, the psychosocial needs of Syrian children are largely disregarded by the authorities, and more sustainable activities, such as sport and the arts, should be performed to accelerate their social integration.¹⁵¹⁴

Purple Roof Women's Shelter Foundation highlights several problems¹⁵¹⁵ faced by unaccompanied children in the earthquake-affected zone. Firstly, unaccompanied children have been settled to the shelters of some organisations that are not reliably acting in the children's best interests. Secondly, there is a lack of clarity on the determination of the adults accompanying the children were their mothers. There is no appropriate review procedure or reliable process to ensure the best interests of non-Turkish unaccompanied children regarding the person that children can be handed over. Furthermore, decisions regarding Syrian unaccompanied children appear to have been made without thorough assessment, relying solely on the children's statements.

2. Women and girls under temporary protection

2.1. Protection from domestic violence

As regards the protection of women, Article 48 TPR refers to Türkiye's Law No 6284 on Protection of the Family and Prevention of Violence, and the Implementing Regulation of this law, which provides a series of preventive and protection measures for women who are either victim or at risk of violence.

¹⁵¹² Article 30(3) TPR, as inserted by Regulation 2018/11208. The previous provision in Article 23(4) TPR has been repealed by the amendment.

¹⁵¹³ Obianet, 'News List', 2023, available [here](#)

¹⁵¹⁴ Halk Sağlığı Bakışıyla Göçün Ruh Sağlığına Etkileri, 'The Effects of Migration on Mental Health From a Public Health Perspective', 2023, available at: <https://bit.ly/3DceNRf>; Ali Rıza Atıcı, 'Ortaokullarda öğrenim gören mülteci ve göçmen çocukların motor beceri düzeyleri ve beden eğitimi temel psikolojik ihtiyaçlarının incelenmesi' 2023, available [here](#)

¹⁵¹⁵ Türkiye'de Deprem Bölgesindeki Refakatsiz Çocukların Durumuna İlişkin Bilgi Notu, 2 Mart 2023

These guarantees are particularly important in light of the persisting risks of gender-based violence or even death generally affecting women in Türkiye.¹⁵¹⁶ Two-thirds of married women who participated in a study conducted in Kocaeli in 2022 reported experiencing one or more forms of gender-based violence in their marriages but only 38% consider divorce.¹⁵¹⁷

Circular No. 2023/16 repealed a previously adopted inter-institutional framework for preventing violence against women and children, including so-called "honour killings." The former circular, "Measures to Prevent Acts of Violence Against Women and Children and Honour Killings," had assigned responsibilities to a wide range of public institutions and private actors, and introduced a system of quarterly monitoring and reporting. Developed following the work of a parliamentary research commission in 2005, it aimed to address the root causes of violence through coordinated action, with oversight roles given to the General Directorate of Social Services and Child Protection (for child-related cases) and the General Directorate on the Status of Women (for gender-based violence and honour-related killings). Institutions such as the Ministries of Justice, Interior, Health, and Education, as well as the Presidency of Religious Affairs, universities, and provincial authorities were listed among the responsible bodies.¹⁵¹⁸

Women subjected to or at risk of domestic violence or sexual or gender-based violence by people other than family members must be protected by the competent state authorities. When a woman contacts the police or any other state institution or a third party informs the authorities, depending on the case, either preventive or protective measures should be taken. Temporary protection beneficiary women can also benefit from these measures.

On the basis of a referral from either the police, women can be referred to Centres for the Elimination and Monitoring of Violence (*Şiddet Önleme ve İzleme Merkezi, ŞÖNİM*), which then refer them to women shelters (*kadın konukevi*) run by the Ministry of Family and Social Services, municipalities or NGOs in accordance with available capacity. However, the problem is that the total number and capacity of women's shelters in Türkiye falls far short of the demand (see [International Protection: Special Reception Needs](#)). According to data shared by the Ministry of Family and Social Services, in 2024, in total there are 150 women's shelters with a capacity of 3,683;¹⁵¹⁹ 112 shelters affiliated with the Ministry in 81 provinces provided services with a capacity of 2,814; 35 women's shelters affiliated with municipalities in 13 provinces with a capacity of 807; 1 women's shelter affiliated with NGOs with a capacity of 42; and 2 women's shelters affiliated with PMM with a capacity of 42.

Since women's shelters are intended to house both Turkish and foreign nationals, temporary protection and international protection recipient women are also affected by the capacity issues. In refugee dense areas such as Gaziantep, Adana, and Şanlıurfa, there is an urgent need for more women's shelters. For instance, in Şanlıurfa, the conditions are not good, especially because of the overcrowding.¹⁵²⁰ In case of a lack of capacity, the referred women might be placed in other cities. In 2024, the women are often reluctant to access these centres, due to lack of trust, the fear of return, deportation, or any possible negative consequences¹⁵²¹. Sometimes due to the differences in legal systems between countries, there is a lack of awareness among refugee women about domestic violence experienced by girls and women, to share information about what violence is, women's shelters, and restraining orders.¹⁵²²

According to a 2024 shadow report submitted by Mor Çatı to the UN Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, language barriers remain a significant obstacle for migrant women in Türkiye in accessing protection services against gender-based violence.

¹⁵¹⁶ For 2017 figures on killings and sexual abuse, see Hürriyet, '409 women killed, 387 children sexually abused in Türkiye: 2017 Report', 2 January 2018, available [here](#). See also Observatory for Human Rights and Forced Migrants in Türkiye, *A Year of Impunity: A one year visual database of migration-related human rights abuses*, July 2017, 14.

¹⁵¹⁷ Birkan Doğan & Hasan H. Taylan, 'Geçici Koruma Altındaki Suriyelilerin Aile İçi Sorunlarının İncelenmesi: Kocaeli Örneği', 2022, available [here](#).

¹⁵¹⁸ Eşik, Eşitlik Sağlanmadıkça Şiddet Artacak, 23.11.2024, available [here](#).

¹⁵¹⁹ T.C. Aile ve Sosyal Hizmetler Bakanlığı, 2024 Faaliyet Raporu, available [here](#).

¹⁵²⁰ Information provided by a stakeholder, March 2024, available [here](#).

¹⁵²¹ Information provided by stakeholders, March – April 2024.

¹⁵²² Information provided by stakeholders, March – April 2024.

Many institutions lack interpretation services, limiting access to justice and long-term support. Women without legal status or outside their province of registration face additional restrictions, including ineligibility for shelters. In some cases, undocumented women seeking shelter are redirected to Provincial Migration Directorates and risk being detained or deported instead of receiving protection. The report also highlights that, in practice, access to shelters often requires a valid ID issued by the Directorate of Migration Management, although this is not legally mandated, excluding many migrant and refugee women from support mechanisms.¹⁵²³

Another related practical limitation is that, although the law clearly provides that both women at risk of violence and women who have actually been subjected to violence should be able to access shelters, in practice due to capacity problems only women who have actually been subjected to violence are offered access to existing shelters. In most cases, shelters also inquire into the women's claim to ascertain that violence is "certain" and request evidence such as an assault report or a criminal investigation, although practice is not uniform across the country. In **South-Eastern Anatolia**, the need for women's shelters is very high. Due to capacity problems, some shelters give priority to women with an assault report or a criminal investigation, which is very difficult for refugee/asylum-seeking women. As a rule, women placed in shelters can stay in the facility for up to six months. Even if they are lucky enough to find a place in a women's shelter, they generally return to the house where they experienced violence at the end of six months. Protection and prevention mechanisms in cases of SGBV/GBV against refugee women in Türkiye do not work effectively.¹⁵²⁴

As a rule, women placed in shelters can stay in the facility up to 6 months. This period can be extended on exceptional basis. Victims of human trafficking are housed in two shelters located in Ankara and Kırkkale for one month (see International Protection: Special Reception Needs).¹⁵²⁵

The Women Shelters Regulation issued in 2013 also clearly indicates that for a woman to be admitted to a shelter, she is not required to provide a valid identity document. However, a Temporary Protection Identification Document is required of women seeking to be admitted to shelters in practice. In 2024, most women's shelters in Türkiye required municipal registration and a valid identification number for admission. While Turkish women could be accepted without a prior criminal complaint, foreign women without registration faced significant barriers. Due to security concerns—particularly the need to identify individuals potentially involved in criminal activity—ŞÖNİMs (shelters) often defer to the police for initial screening. However, when unregistered foreign women approach police to file complaints, they are frequently referred to removal centres. Although authorities claim that at-risk women and children are promptly transferred from removal centres to shelters, stakeholders report that in practice, these individuals face a serious risk of deportation.¹⁵²⁶

Conditions in shelters are restrictive and many migrant women leave after a short period of time due to discrimination and psychological violence from other women¹⁵²⁷. LGBTQI+ women are automatically excluded from these shelters.¹⁵²⁸

According to statistics shared by the Presidency of Migration Management (PMM), a total of 223 victims of human trafficking were identified in 2023. In the same year, 8,251 interviews were conducted with individuals considered potential victims of trafficking. In 2024, the identification and interview numbers have remained lower than targeted. In the first quarter of the year, 4,048 interviews were conducted, resulting in the identification of 43 victims. In the second quarter, 2,610 interviews led to the identification of 57 victims. The third quarter saw 694 interviews and 37 identified victims, while in the fourth quarter, 899 interviews resulted in 42 identified victims. PMM has explained that the number of interviews and identified victims is influenced by referrals from first-contact units and the operational procedures of provincial directorates. A consistent decline in referrals from public institutions, coupled with the loss of expertise due to staff turnover

¹⁵²³ Mor Çatı, Türkiye'de Göçmen Kadınlar ve Kadına Yönelik Şiddet Birleşmiş Milletler Tüm Göçmen İşçilerin ve Aile Fertlerinin Haklarının Korunması Komitesi'ne Sunulan Gölge Rapor, June 2024, available [here](#).

¹⁵²⁴ Information provided by a stakeholder, May 2023.

¹⁵²⁵ PMM, 'İnsan Ticareti İle Mücadele 2023', available [here](#).

¹⁵²⁶ Information provided by multiple stakeholders, February and May 2025.

¹⁵²⁷ Information provided by stakeholders, March – April 2024.

¹⁵²⁸ Information provided by a stakeholder, March 2021 and May 2023.

within the provincial directorates, has contributed to the figures falling below expectations throughout the year.¹⁵²⁹

In 2024, UNHCR continued to support gender-based violence (GBV) prevention and response in cooperation with the Ministry of Family and Social Services and the Presidency of Migration Management (PMM), under the framework of a Protocol of Cooperation signed in October 2021. This cooperation included institutional capacity-building and operational assistance. UNHCR and its partners reached 194,145 refugees through GBV-related information campaigns, and 16,318 individuals received targeted support. A total of 2,892 refugees with GBV-related needs were identified and referred to relevant institutions for medical, psychosocial, accommodation, or transportation support. UNHCR also provided a dedicated counselling line and published GBV-related information through its UNHCR Türkiye Help Page. In addition, 1,500 technical staff were trained or sensitised on GBV prevention and response, and 126 institutions received human resources support, including the recruitment of psychologists and social workers. Cash assistance was also provided to GBV survivors to support their recovery.¹⁵³⁰

Discriminatory behaviour is common among public officers working at courthouses. Alongside open hate speech, public officers can display other forms of discrimination against refugees, such as not properly informing them or slowing down the judicial process. Access to justice in the courts is further complicated due to language barriers. Women receive notifications from the courts in Turkish not in Arabic including in SMS messages. Syrian women's cases can be rejected due to a lack of translators in the courts or a lack of knowledge on the part of the legal aid staff. Some NGOs provides information on their rights, such as Women's Solidarity Foundation, Mavi Kalem, and Refugee Rights Türkiye.

One exemplary initiative to ensure access to justice for refugee women is the grant agreement between the Council of Europe and the Union of Turkish Bar Associations (UTBA¹⁵³¹). This grant, part of the "Women's Access to Justice in Türkiye" project, aims to provide comprehensive legal aid services, particularly targeting women victims of violence and those from vulnerable groups such as refugees and migrants. The project emphasizes gender-responsive legal aid, training lawyers in gender sensitivity, and ensuring that applicants receive consistent and intersectional support. Additionally, it seeks to remove barriers and geographical obstacles to legal aid, ensuring that trained legal aid lawyers, selected by local bar associations, provide quality legal advice and representation, thereby safeguarding women's human rights in alignment with European standards.

Courts issue suspension orders in cases of domestic violence, but in 2024, they have been still ineffective because the perpetrators and victims sometimes reside in the same household. Violence perpetrated along the migration route is pervasive but completely invisible. Syrian women cannot discuss sexual harassment or assault of this nature.¹⁵³² In case of living in common settlement areas in the earthquakes affected region, there is a difficulty regarding the implementation of the restraining order, an injunction decision is taken, but in some cases, the security has no information about this order which make harder to implement the order and provide the security to the women.¹⁵³³

2.2. Polygamous and arranged marriages

In addition to violence, the protection of women and girls under the age of 18 involved in arranged marriages and unofficial polygamous marriages – including "second wives" and girls sold by their families – is a persistent and significant concern. Despite the fact that both practises are illegal under Turkish law, polygamous marriages are lawful in Syria, and women are not always aware of the legal differences between the two countries. These issues have also contributed to an increase in the rate of early divorce

¹⁵²⁹ PMM, Faaliyet Raporu 2024

¹⁵³⁰ UNHCR, Enhancing Protection for Refugee Women and Children Factsheet, January 2025, available [here](#)

¹⁵³¹ CoE, December 2022, Understanding Barriers to Women's Access to Justice and Legal Aid in Türkiye, available [here](#)

¹⁵³² Information provided by a stakeholder, May 2023.

¹⁵³³ Information provided by stakeholders, March – April 2024.

among girls under the age of 18.¹⁵³⁴ In 2023, it is observed that there is an increase on child marriages, especially in the earthquakes-affected area¹⁵³⁵.

To overcome threats posed by prostitution and sexual assault, early marriages and becoming a co-wife (Kuma in Turkish) are considered a means of social protection for some refugee women. The rates of early and/or forced marriages, sexual violence, polygamy, unwanted pregnancies, unsafe deliveries, and maternal mortality among Syrian refugees are significantly higher than among Turkish women.¹⁵³⁶ As the status of the second wife is not recognised in Turkish Civil Law, in the case of abuse and violence they have difficulties in accessing their legal rights.¹⁵³⁷

In 2023, the Turkish Court of Cassation upheld the annulment of a second marriage, conducted in Syria by a Syrian national who later acquired Turkish citizenship, on the grounds of absolute nullity due to violation of public order. The individual had legally married a second wife in Syria while still married to the first, and upon gaining Turkish citizenship, both marriages were registered in Türkiye. The decision, based on Turkish Civil Code Article 145/1, was initially challenged but ultimately confirmed by the Court of Cassation, emphasizing that polygamy is prohibited under Turkish law regardless of the individual's previous nationality and legal practices in their country of origin.

In spite of criminalisation in Turkish law, temporary protection recipients have limited opportunities to claim the relevant legal safeguards and protection measures due to a lack of adequate public information and, most importantly, a critical shortage of counselling and legal assistance services available to refugee women. In addition, when treating child brides and mothers, public authorities such as health care institutions frequently fail to fulfil their legal obligation to inform the police of child marriage cases. In cases where they inform the authorities, police officers may not investigate the incidents.¹⁵³⁸ Statistics on such reports are not available countrywide in 2023.

Initiatives such as the Child Protection Centre run by Türk Kızılay in Altındağ, **Ankara** offer information to women on early pregnancy, child marriage, sexual harassment, reproductive rights and contraception. Many NGOs have child protection activities.

In practice, challenges arise when a co-wife seeks a divorce. In some countries of origin, religious marriage (imam nikahı) is considered official, whereas Türkiye follows a different legal procedure. Individuals married through religious ceremonies who come to Türkiye are often registered by migration authorities under only one spouse, as per official records. When seeking a divorce, some Turkish courts accept this migration management records, while others require official marriage documents from the individuals' consulates. For a co-wife who is not registered by migration authorities, obtaining a divorce is effectively impossible. In 2024, stakeholders noted cases where multiple co-wives were registered as dependant under the same family identification number, but it remains unclear under what relationship category the co-wives were registered.¹⁵³⁹

In addition, polygamous marriages have an impact on refugees' access to certain rights such as [Social Welfare](#). The assistance granted under the ESSN, for instance, is only provided to one wife and her registered per household.¹⁵⁴⁰

2.3. The situation of sex workers

Since sex work is frequently perceived in Türkiye as behaviour endangering public order or health, certain groups like sex workers are particularly vulnerable. In an evacuation case filed against a Syrian transgender sex worker woman by the end of 2022, it was argued that she was required to leave the property because she engaged in sex work and was a transgender woman, neither of which is unlawful in Türkiye. The case is

¹⁵³⁴ Information provided by a stakeholder, May 2023.

¹⁵³⁵ Information provided by stakeholders, March – April 2024.

¹⁵³⁶ *Ibid*, page 7.

¹⁵³⁷ *Ibid*, page 8.

¹⁵³⁸ Information provided by a stakeholder, May 2023.

¹⁵³⁹ Information provided by a stakeholder, February and March 2025.

¹⁵⁴⁰ Information provided by a stakeholder, May 2023.

still pending.¹⁵⁴¹ Due to the small amount of the financial support provided by UNHCR and the inability to access the labour market, their engagement in sex work continued through 2024.¹⁵⁴² As of May 2025, the UNHCR discontinued its monthly financial assistance for transgender refugees, contributing to a deterioration in their living conditions. According to stakeholders, transgender refugees face significant barriers to formal employment due to persistent stigmatization, which often leads them to engage in informal or precarious work, including sex work. This reliance on financial support had made the discontinuation of aid particularly impactful for this group.¹⁵⁴³ Syrian cisgender sex workers who are victims of gender-based violence have the right to be placed in SONIM, but due to the language barrier, they typically leave the shelter after three to four days.¹⁵⁴⁴

According to the study conducted by the Red Umbrella Association, Syrian sex workers are stigmatized on the basis of both being a Syrian and doing sex work/ Syrian sex workers interviewed said that they were subjected to discriminatory treatment and ill-treatment in their encounters with law enforcement officers. Syrian sex workers do not know which center they should apply to for which health problem¹⁵⁴⁵.

3. Torture survivors under temporary protection

Both LFIP and TPR identify “torture survivors” among persons with special needs. Torture survivors, like all other temporary protection beneficiaries, have access to a range of healthcare services in public hospitals, including psychiatric assistance. There is also a small number of NGOs, such as Human Rights Foundation of Türkiye, that specialise in treatment and rehabilitation services to torture survivors.

4. LGBTIQ+ persons under temporary protection

Persons belonging to lesbian, gay, bisexual, transgender and intersex populations are not defined by the TPR as a category of “persons with special needs”. The lack of a gender-sensitive registration procedure under TPR has an impact on their ability to disclose their sexual orientation or gender identity or being registered as persons with special needs.¹⁵⁴⁶ However, it should be noted that when they inform PDMM’s protection offices about their gender identity or sexual orientation, they are eligible for a protection interview and resettlement evaluation. UNHCR implementing partners often provide help in this process.¹⁵⁴⁷

Because of the PDMMs’ referrals, LGBTIQ+ communities living in relatively small cities like Yalova, where approximately 2,000 LGBTIQ+ individuals live encounter significant housing, labour market, and health care problems and wish to leave Türkiye as soon as possible.¹⁵⁴⁸ Their access to health care, including in Migrant Health Centres (see [Health Care](#)) is hindered by high levels of discrimination and fear of being exposed to a family member and they prefer approaching to public hospitals.¹⁵⁴⁹

As a result of the change in registration policy, from 6 June 2022 to 6 February 2023, PDMMs referred Syrians seeking protection to temporary accommodation centres. For instance, one transgender person was granted access to the temporary accommodation centre in Kahramanmaraş, while another transgender woman’s access was denied by temporary accommodation center in Adana. In these two cases, they were unable to register. However, in cases of gender-based violence registration was accessible.

In the context of widespread discrimination targeting both refugee and LGBTIQ+ communities, LGBTIQ+ refugees feel unsafe and vulnerable. This discrimination is prevalent when they seek accommodation or labour market access¹⁵⁵⁰. In 2024, a Syrian transgender woman was stigmatized, apprehended and then

¹⁵⁴¹ Information provided by a stakeholder, June 2023.

¹⁵⁴² Information provided by a stakeholder, June 2023.

¹⁵⁴³ Information provided by a stakeholder, April 2025.

¹⁵⁴⁴ Information provided by a stakeholder, June 2023.

¹⁵⁴⁵ Gerçek Gündem, ‘Araştırma: Türkiye’deki yabancılar (2) Suriyeli seks işçileri Türkiye’de neler yaşıyor?’, 19.07.2023, available [here](#)

¹⁵⁴⁶ Information provided by a stakeholder, June 2023.

¹⁵⁴⁷ Information provided by s stakeholder, June 2023.

¹⁵⁴⁸ Open Democracy, ‘I Am Not Your Refugee: From All Over: LGBTQ Türkiye’, 6 October 2022, available [here](#)

¹⁵⁴⁹ Information provided by a stakeholder, June 2023.

¹⁵⁵⁰ Information provided by s stakeholder, March 2024.

deported after her HIV status was shared publicly. Lately it was reported that she was murdered in Syria. (For more details, see: Reception of LGBTQI+ persons). An MP from the National Assembly highlighted the heightened risks faced by LGBTI+ individuals in removal centres. She stated that the conditions in these centres have effectively become punitive for all groups, but LGBTI+ persons face an increased risk of violence. Migrants who should not be housed together are forced to share rooms, and no separate facilities are provided for LGBTI+ individuals, exposing them to harassment, assault, and ill-treatment. In some cases, isolation was reportedly used as a means of “protection” against violence.¹⁵⁵¹

In June 2024, Mülteci-Der conducted a focus group discussion in İzmir with five Syrian transgender women under temporary protection, aiming to document their lived experiences in Türkiye. Participants reported facing widespread societal prejudice and transphobia, with particularly acute challenges in educational settings. Some reported that they had been forced to leave school or experienced threats from teachers due to their gender identity.

In the workplace, participants stated they had to leave jobs due to persistent harassment and bias from both employers and colleagues. One participant shared having worked in a state-run factory but was compelled to resign due to ongoing discrimination. The discussion also highlighted the deep social stigma attached to both refugee and trans identities. One participant remarked that “*some Turkish citizens show more respect to animals than to Syrian trans women,*” illustrating the severe level of dehumanization experienced. The psychological toll of constant discrimination was described as severe. To avoid drawing attention in public, participants said they were compelled to change their appearance, such as growing out their hair or beards, which caused both emotional and physical distress. Due to unsafe conditions and a lack of prospects, some participants expressed a desire to leave Türkiye. Despite being aware of the risks associated with irregular migration, including trafficking and sexual violence, they viewed such routes as more bearable than enduring continued hostility and marginalization in Türkiye.¹⁵⁵²

5. Ethnic and other minorities under temporary protection

The number of members of ethnic minorities, such as Roma, Dom and Lom groups from Syria are not known for certain. In **Gaziantep**, these groups generally live in rural areas, work in seasonal agricultural work and refrain from registering out of fear of being discriminated by the public authorities.¹⁵⁵³ In the **Şirinevler** district of Gaziantep 70% of the population is Dom. In **Gaziantep**, there is a huge industrial area in the Unaldi district where many Syrians including Doms, are employed without a work permit. In rural areas, families generally live together. However, in big cities, they prefer not to be visible and live separated from each other.

Research conducted by Kırkayak Kültür¹⁵⁵⁴ has revealed that negative perceptions, attitudes and discriminatory practices against Dom and Abdal communities, and the inability of Dom and Abdal communities to access rights and services in the aftermath of the earthquake appears to be a result of multi-layered discriminatory practices. Another research highlighted the challenges faced by Dom, Abdal, and Roma communities living in the earthquake-affected provinces. In the aftermath of the disaster, these minority groups encountered significant discrimination, particularly in accessing basic services in areas they shared with refugees. Beyond exclusion from services, they were also subjected to widespread hate speech, with members of the majority population labelling them as thieves, looters, and plunderers.¹⁵⁵⁵

(For more information see [AIDA Türkiye 2023](#))

¹⁵⁵¹ Evrensel, EMEP Milletvekili Sevda Karaca: GGM'ler göçmenler için cezaevine dönüştü, 19.12.2023, available [here](#).

¹⁵⁵² Mülteci-Der, Boşluk ve Düzensizlik Arasında Suriyeli Trans Kadın Mültecilerin İzmir'deki Durumu, 01.12.2024, available [here](#).

¹⁵⁵³ Information provided by a stakeholder, May 2023.

¹⁵⁵⁴ Kırkayak Kültür, February 2024, “We started from zero, we returned to zero again...”, available [here](#).

¹⁵⁵⁵ Minority Rights Group, REPORT ON THE MONITORING OF DISCRIMINATION EXPERIENCED BY DOM, ABDAL AND ROMA PEOPLE IN SOUTHERN TÜRKİYE FOLLOWING THE 2023 EARTHQUAKE, 2023, available [here](#); Bianet, Depremlerin ardından yükselen ayrımcı ve ötekileştirici uygulamalar | Rom, Dom, Lom ve Abdallar, available [here](#).