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Asylum Information Database

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European Council on Refugees and Exiles

UPDATE ON 2025

TÜRKIYE

COUNTRY REPORT

JULY 2026

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 2025 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 2025, 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 27 countries. This includes 21 EU Member States (AT, BE, BG, CY, CZ, DE, ES, FR, GR, HR, HU, IE, IT, MT, NL, PL, PT, RO, SE, SI, SK) 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.

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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.

Table of Contents

Glossary & List of Abbreviations 7

Statistics 10

Overview of the legal framework 12

Overview of main changes since the previous report update 17

Introduction to the asylum context in Türkiye 25

Asylum Procedure 28

A. General 28
1. Flow chart 28
2. Types of procedures 29
3. List of authorities that intervene in each stage of the procedure 29
4. Number of staff and nature of the determining authority 30
5. Short overview of the asylum procedure 31

B. Access to the procedure and registration 32
1. Access to the territory and push backs 32
2. Removal and *refoulement* 41
3. Registration of the asylum application 55

C. Procedures 63
1. Regular procedure 63
2. Dublin 78
3. Admissibility procedure 79
4. Border procedure (border and transit zones) 80
5. Accelerated procedure 81

D. Guarantees for vulnerable groups 84
1. Identification 84
2. Special procedural guarantees 87
3. Use of medical reports 88
4. Legal representation of unaccompanied children 88

E. Subsequent applications 89

F. The safe country concepts 90
1. First country of asylum 91
2. Safe third country 91

G. Information for asylum seekers and access to NGOs and UNHCR 92
1. Provision of information on the procedure 92
2. Access to NGOs and UNHCR 93

H. Differential treatment of specific nationalities in the procedure 95
1. Syria 95
2. Iraq 95
3. Afghanistan 96
4. Ukraine 97

5. Other nationalities 99

Reception Conditions 100

A. Access and forms of reception conditions 104
1. Criteria and restrictions to access reception conditions 104
2. Forms and levels of material reception conditions 105
3. Reduction or withdrawal of reception conditions 108
4. Freedom of movement 109
B. Housing 113
1. Types of accommodation 113
2. Conditions in reception facilities 115
C. Employment and education 117
1. Access to the labour market 117
2. Access to education 122
D. Health care 127
1. Scope of health care coverage 129
2. Practical constraints on access to health care 131
E. Special reception needs of vulnerable groups 135
1. Reception of unaccompanied children 135
2. Reception of survivors of torture or violence 136
3. Reception of LGBTQI+ persons 139
4. Reception of persons living with HIV 141
F. Information for asylum seekers and access to reception centres 141
1. Provision of information on reception 141
2. Access to reception centres by third parties 142
G. Differential treatment of specific nationalities in reception 142

Detention of Asylum Seekers 143

A. General 143
B. Legal framework of detention 144
1. Grounds for detention 144
2. Alternatives to detention 147
3. Detention of vulnerable applicants 152
4. Duration of detention 155
C. Detention conditions 156
1. Place of detention 156
2. Conditions in detention facilities 162
3. Access to detention facilities 167
D. Procedural safeguards 172
1. Judicial review of the detention order 172
2. Legal assistance for review of detention 175
E. Differential treatment of specific groups in detention 177

Content of International Protection 178

A. Status and residence 180
1. Residence permit 180
2. Civil registration 181
3. Long-term residence 183
4. Naturalisation 184
5. Cessation and review of protection status 185
6. Cancellation of protection status 186
B. Family reunification 187
1. Criteria and conditions 187
2. Status and rights of family members 188
C. Movement and mobility 188
1. Freedom of movement 188
2. Travel documents 188
3. Resettlement 189
D. Housing 190
E. Employment and education 190
1. Access to the labour market 190
2. Access to education 191
F. Social welfare 191
G. Health care 191

Temporary Protection Procedure 193

A. Scope and activation procedure 193
B. Qualification for temporary protection 193
1. Eligibility criteria 193
2. Cessation of temporary protection 196
3. Exclusion and cancellation of temporary protection 202
C. Access to temporary protection and registration 204
1. Admission to territory 204
2. Registration under temporary protection 205
3. Appeal 207
4. Legal assistance 208
D. Detention in the temporary protection framework 209

Content of Temporary Protection 211

A. Status and residence 214
1. Protection from *refoulement* 214
2. Temporary protection identification document 215
3. Naturalisation 216
B. Family reunification 217
C. Movement and mobility 218
1. Freedom of movement 218
2. Travel documents 219

3. Resettlement and family reunification departures 220
D. Housing 222
1. Temporary Accommodation Centres 222
2. Urban and rural areas 223
E. Employment and education 226
1. Access to the labour market 226
2. Access to education 232
F. Social welfare 236
G. Health care 238
1. Conditions for health care 238
2. Obstacles to access in practice 241
H. Guarantees for vulnerable groups 243
1. Unaccompanied children under temporary protection 244
2. Women and girls under temporary protection 245
3. Torture survivors under temporary protection 250
4. LGBTQI+ persons under temporary protection 250
5. Ethnic and other minorities under temporary protection 251

Glossary & List of Abbreviations

AFAD	Disaster and Emergency Management Authority | Afet ve Acil Durum Yönetimi Başkanlığı
CCTE	Conditional Cash Transfer for Education I Şartlı Eğitim Yardımı
CİMER	Presidency Communication Centre | Cumhurbaşkanlığı İletişim Merkezi
ÇODEM	Child Support Centre | Çocuk Destek Merkezi
ECHR	European Convention on Human Rights I Avrupa İnsan Hakları Sözleşmesi
ECtHR	European Court of Human Rights I Avrupa İnsan Hakları Mahkemesi
ESSN	Emergency Social Safety Net I 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 il 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 *Turkish* 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 I Birleşmis 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 different 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 çalişan 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 I Kaçakçılık Suçları
G-47	Smuggling I 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 Yükümlülüklere 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 Izni 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 dönuş
V91	Temporary protection holder requiring permission to exit | Ülkemizden Çıkışı İzne Tabi Geçici Koruma Kapsamındaki Yabancı

V92	Subsequent registered foreigner | Mükerrer kaydı olan yabancı
V154	Legal Appeal Against the Deportation Order | Sınır Dışı Etme Kararına Karşı Dava
V205	Entry Ban | Giriş Yasağı
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 2025

Total	**6,430**
Afghanistan	3,472
Iraq	1,463
Iran	585
Others	910

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

Registered temporary protection beneficiaries: 31 December 2025: 2,347,756[1]

	Percentage
Total number	100%
0-4 Female	6.6%
0-4 Male	7.0%
5-17 Female	16.5%
5-17 Male	17.5%
18-64 Female	24.4%
18-64 Male	26.4%
65+ Female	0.9%
65+ Male	0.7%

As of 9 July 2026, there are 2,245,765 temporary protection beneficiaries.

[1] IOM, *Türkiye — Overview of Migrant Situation - Annual Report (Jan-Dec 2025)*, available here.

Breakdown per fifteen main provinces: 9 July 2026

Province	Registered Syrian refugees	Total population in Province	Share of total
İstanbul	395,709	16,149,762	2.08%
Gaziantep	316,044	2,538,459	12.45%
Şanlıurfa	190,861	2,456,661	7.77%
Hatay	136,628	1,714,159	7.97%
Adana	171,405	2,455,014	6.98%
Mersin	141,195	2,097,623	6.73%
Bursa	131,192	3,394,203	3.87%
Konya	98,705	2,442,114	4.04%
İzmir	95,541	4,599,726	2.08%
Ankara	67,428	5,977,748	1.13%
Kahramanmaraş	54,649	1,200,927	4.55%
Kayseri	60,060	1,519,051	3.95%
Kilis	46,189	203,552	22.69%
Mardin	43,227	946,803	4.57%
Kocaeli	38,986	2,200,157	1.77%

Source: PMM Website, available at: https://bit.ly/3Da9Jg4.

Overview of the legal framework

Main legislative acts relevant to international protection and temporary protection

Title (EN)	Original Title (TR)	Abbreviation	Web Link
Law No 6458 on Foreigners and International Protection, 11 April 2013	6458 Yabancılar ve Uluslararası Koruma Kanunu, 11 Nisan 2013	LFIP	http://bit.ly/40YVwyW (EN) https://bit.ly/2ISX0RA (TR)
Amended by: Emergency Decree No 676, 29 October 2016	676 Olağanüstü Hal Kapsamında Bazı Düzenlemeler Yapılması Hakkında Kanun Hükmünde Kararname, 29 Ekim 2016		http://bit.ly/2z0t3wh (TR)
Amended by: Law No 7070, 1 February 2018 on the regulation of emergency provisions	7070 Olağanüstü Hal Kapsamında Bazı Düzenlemeler Yapılması Hakkında Kanun Hükmünde Kararnamenin Değiştirilerek Kabul Edilmesine Dair Kanun, 1 Şubat 2018		http://bit.ly/2S5DZzL (TR)
Amended by: Decree No 703 on the harmonisation of laws, 9 July 2018	703 Anayasada yapılan değişikliklere uyum sağlanması amacıyla bazı kanun ve kanun hükmünde kararname, 9 Temmuz 2018		https://bit.ly/2WAu8nx (TR)
Amended by: Law No 7148 amending several acts, 26 October 2018	7148 Bazı Kanunlarda Değişiklik Yapılması Hakkında Kanun, 26 Ekim 2018		http://bit.ly/2EqekOa (TR)
Amended by: Law No 7196 amending several acts, 6 December 2019	7196 Bazı Kanunlarda Değişiklik Yapılmasına Dair Kanun, 6 Aralık 2019		http://bit.ly/2TSm0zU (TR)
Amended by: Law no 7533 amending several acts, 21 November 2024	7533 Dahiliye Memurları Kanunu ve Bazi Kanunlar ile 375 Sayılı Kanun Hükmünde Kararnamede Değişiklik Yapılmasına Dair Kanun, 21 Kasım 2024		https://bit.ly/3IFRCoA (TR)
Law No 6735 on International Workforce, 13 August 2016	6735 Uluslararası İşgücü Kanunu, 13 Ağustos 2016		http://bit.ly/2jtRexU (TR)
Regulation on the Implementation of Law on International Workforce, 2 February 2022	Uluslararası İşgücü Uygulama Yönetmeliği, 2 Şubat 2022		https://bit.ly/3rp0gz7 (TR)

Law No 2577 on Administrative Court Procedures, 6 January 1982	2577 İdari Yargılama Usulleri Kanunu, 6 Ocak 1982		http://bit.ly/1KcDTzg (TR)
Law No 1136 on Attorneys, 19 March 1969	1136 Avukatlık Kanunu, 19 Mart 1969		http://bit.ly/1fATsUx (TR)
Law No 1512 Notaries, 18 January 1972	1512 Noterlik Kanunu, 18 Ocak 1972		http://bit.ly/1Rw8wyN (TR)

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	Geçici Koruma Yönetmeliği 2014/6883, 22 Ekim 2014	TPR	http://bit.ly/44S9Ykd (TR) http://bit.ly/3IC3jMU (EN)
Amended by: Regulation 2016/8722, 5 April 2016	Geçici Koruma Yönetmeliğinde Değişiklik Yapılmasına Dair Yönetmelik 2016/8722, 5 Nisan 2016		http://bit.ly/209ErLl (TR)
Amended by: Regulation 2018/11208, 16 March 2018	Geçici Koruma Yönetmeliğinde Değişiklik Yapılmasına Dair Yönetmelik 2018/11208, 16 Mart 2018		https://bit.ly/2GynE4b (TR)
Amended by: Regulation 2019/1851, 25 December 2019	Geçici Koruma Yönetmeliğinde Değişiklik Yapılmasına Dair Yönetmelik 2019/1851, 25 Aralık 2019		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 Calışmasına 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, İşlettirilmesi 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 onIDs 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/4lEQ2la (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	Evlendirme Yönetmeliği, 10 Temmuz 1985		http://bit.ly/1KabY1f (TR)

Amended by: Regulation amending the Regulation on Marriage Procedures, 8 December 2016	Evlendirme Yönetmeliğinde Değişiklik Yapılması Hakkında Yönetmelik, 08 Aralık 2016		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 Altina Alınanların Evlenme ve Çocuklarının Tanınması Konulu Yazı, 13 Ekim 2015		https://bit.ly/4o0SCDQ (TR)
Regulation on the Implemetation of Law on Turkish Citizenship Procedures, 11 February 2010 Amended by: Regulation amending the Implemeting of Law on Turkish Citizenship Procedures, 12 May 2022	Türk Vatandaşlığı Kanunun 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/1VeEOn5 (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	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)

General Directorate of Disabled and Elderly Services, 25 November 2024			
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 Yükümlülüklere Dair Yönetmelik. 14 Eylul 2022		https://bit.ly/44jRMYy (TR)

Overview of main changes since the previous report update

In 2025, Türkiye hosted a population of over 2.3 million refugees[2] from Syria under the temporary protection regime and around 166,000 asylum seekers and beneficiaries of protection of other nationalities, principally originating from Afghanistan, Iraq and Iran among others.[3] 6,430 asylum seekers applied for international protection; the majority is from Afghanistan (3,472). Many of the challenges highlighted in the last year's report remain for 2025, however, the regime change in Syria in December 2024, together with PRM's funding cuts to USAID throughout 2025, affected individuals' lives the most.

In 2025, 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. It was widely understood that individuals had been suffering at different stages of the international protection procedure: accessing registration remained very difficult; once registered, people faced frequent arbitrary rejections; and obtaining positive outcomes from the courts was nearly impossible. Those who had been granted conditional refugee status years ago began losing that status, and individuals were being deprived of access to healthcare. Although these affected different groups and arose from different grounds, the outcome was the same — people were being deprived of access to basic rights, particularly healthcare, as officials sought to reduce the number of people benefiting from it, viewing it as a burden on the economy. Additionally, PMM exercised considerable discretion in granting humanitarian residence permit to the ones in need of international protection. Because it offers no non-refoulement protection and does not provide access to healthcare, stakeholders raised concerns that PMM is using it to channel individuals with credible international protection claims away from the international protection procedure and into a status with markedly weaker safeguards.

A new phase began after December 2024. With the regime change in Syria, it is anticipated that many Syrians mays wish to return, given the presumed elimination of persecution risks. As of June 2026, there was no formal announcement regarding the lifting of temporary protection. However, official figures indicate that more than 700,000 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.

Deteriorating Access to Protection and Rights

In 2025, 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

2 PMM, Temporary Protection Statistics, available here.
3 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.

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.[4] Throughout 2025, it was nearly impossible to predict the outcome of a specific legal situation, since there are too many variables involved, which makes it very difficult to navigate the legal system.

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.[5] 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.[6]

Effects of funding cuts

Since NGO operations were reduced while the need remained the same, access to services began to decline compared to before. Among individuals receiving counseling from NGOs, the issues they struggled with most were access to healthcare and GBV cases. On access to healthcare, GHI registrations were being denied in an arbitrary manner, and the resulting hardships, ranging from being unable to get even a simple hospital appointment, affected people because they depended on NGO counseling to navigate these problems. In GBV cases, when women survivors of violence went to police centers, they were pressured by police to reconcile with their abusers and were threatened with removal to a Removal Center if they pursued a complaint, as a result, they increasingly stopped being able to file complaints on their own. When an NGO representative accompanied them, however, it was more likely that their complaints would be officially recorded and that they would be placed in a shelter according to their needs. Finally, the status of individuals holding conditional refugee status began to be revoked abruptly, and those who were not receiving regular NGO counseling missed their appeal deadlines, since these status revocations were notified electronically.

Return Dynamics and Post-December 2024 Developments

As of December 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.

4 Information provided by stakeholders, March, April and May 2025.
5 Mülteci-Der, Belirsizlikle Başa Çıkmak, 24.01.2025, available here.
6 Information provided by a stakeholder, April 2025.

Throughout 2025, the pace of returns visibly slowed down, despite Turkish officials' efforts both to encourage Syrians to return and to publicise the relevant statistics very recently. Stakeholders reported that returnees frequently share information on the situation in Syria with those still in Türkiye. Although there is no major persecution problem, except for certain groups who could fall under a refugee claim (ethnic or religious minorities, or LGBTIQ+ people), the main problem is the lack of infrastructure in Syria: electricity is available only 3–8 hours a day outside Damascus, there are no decent jobs, salaries are at a record low, and healthcare is inadequate. Stakeholders also note that after more than ten years, it has become harder for people — especially those whose children were born and raised in Türkiye — to move to another country, one where their children cannot speak the language and have never seen before.

Asylum procedures

- **Asylum statistics**: In 2025, there were 6,430 applicants for international protection, which corresponds to a 28.6% decrease compared to 2024 and a 66.1% decrease compared to 2023.[7] It is a record-low number since 2010, even lower than prior to the adoption and implementation of the LFIP. Despite the number of applications, 63,406 international protection applications were concluded during the period, either positively or negatively.[8] While no official breakdown is available, stakeholders reported that the majority of these decisions were negative. This asymmetry reflects PMM's apparent intention to gradually reduce the pool of pending applicants through negative decisions, while they remain reluctant to register new applications. Afghans accounted for the largest number of applicants (3,472) followed by Iraqis (1,463) and Iranians (585). According to PMM statistics,[9] 160,253 irregular migrants were apprehended in 2025, reflecting a significant decrease compared to 2024 (225,831). Afghans continued to constitute the largest group among those apprehended for irregular status, with 44,157 individuals. Syrians were the second most represented nationality, with 22,515 apprehensions. Other prominent nationalities included Turkmens, Egyptians, 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 2025.

- **Strengthened border control and border infrastructure**: As of October 2025, security walls have been completed along approximately 87 percent of the Syria and Iran borders, covering 1,274 kilometers, alongside 1,275 kilometers of patrol roads along the same lines. Across all land borders, patrol roads now extend to 1,700 kilometers, covering roughly 58 percent of the country's 2,949-kilometer land border. On the Van segment of the Iranian border, 26 kilometers of the planned 92-kilometer stretch had been completed by October 2025, and construction continues. On the Iraqi border, 25 kilometers of physical barriers and 26 kilometers of patrol roads have been completed, with a further 13 kilometers still underway. Surveillance infrastructure has also been expanded, with 223 watchtower systems installed along the eastern and southeastern borders, and 341 electro-optic towers established, 250 of which are located on the eastern borders. Together with high-capacity thermal cameras, elevator towers, armored surveillance vehicles, and seismic sensor systems, this infrastructure enables monitoring of 740 kilometers of the eastern border.[10] 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

7 PMM, International Protection Statistics, available here.
8 PMM, *Faaliyet Raporu 2025*, available here.
9 PMM, Irregular Migration Statistics, available here.
10 AA, Türkiye'nin kara sınırlarının yaklaşık yüzde 44'üne güvenlik duvarı örüldü, 30 October 2025, available here.

after participating in these visits and were issued a V-175 restriction code. As of June 2025, 27,000 people were granted permission to make use of this opportunity.[11]

- **Access to the territory and pushbacks at the borders:** Despite the building of border walls and increasing surveillance along Türkiye's Eastern border, this 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 2025, 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. The advancement of wall construction along the Iran-Türkiye border in 2025 has pushed irregular migration routes into mountainous, higher-risk areas where construction has yet to be completed. This shift has made crossings markedly more dangerous, with stakeholders noting instances of cold-related injuries sustained during the journey.[12] Beginning on 20 August 2025, land border crossings between Türkiye and Syria started permitting passport-based entry and exit, a development tied to the broader normalisation process following Syria's political transition in December 2024. This applies to Turkish citizens as well as Syrian nationals holding third-country citizenship, who may now use any land crossing point except those falling within the Operation Peace Spring zone.[13]

- **Access to registration:** The registration of applications remained one of the most significant barriers to people seeking international protection in Türkiye in 2025.[14] The provinces where PDMMs were willing to accept applications varied throughout the year and did not reflect a consistent practice. 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.[15] This practice continued in 2025. Given that the registration system had been effectively frozen for close to two years, applicants by 2025 had largely resigned themselves to the reality that certain profiles notably single men from Afghanistan, Iran, or Iraq faced nearly insurmountable obstacles to registering. Vulnerable applicants, particularly single mothers and single women, still managed to register in some instances, usually via NGO referral or sustained advocacy from a private lawyer. Nationalities less familiar to PDMM officials seemed to have somewhat better odds than more commonly encountered ones Sri Lankan applicants faring better than Afghan applicants, for example. On the rare occasions a single man did manage to register, the only viable route available to him was referral to the Nizip TAC in Gaziantep.

- **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. Between 8 December 2024 and July 2026, more than 700,000 people voluntarily returned to Syria. Throughout 2025, returns to Syria dominated PMM's agenda almost to the exclusion of everything else. Public communications were overwhelmingly oriented around this single issue — even individuals approaching PDMM offices for entirely unrelated matters reportedly received voluntary return counseling from officials. PMM was notably eager to publicise the steadily

11 Habertürk, İçişleri Bakanı Ali Yerlikaya Özel Röportaj'da Soruları Yanıtlıyor, 05 June 2025, available here.
12 Information provided by a stakeholder, April 2026.
13 PMM, Suriye'ye Pasaportla Geçiş, 20 August 2025, available here.
14 Information provided by stakeholders, February, March, – April and May 2026.
15 PMM, "İstanbul'da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı" İddialarına İlişkin Basın Açıklaması, 16 July 2023, available here.

declining number of Syrians in Türkiye on a week-by-week basis; no other statistic received anywhere near that level of promotion.

- **Use of security restriction codes and due process concerns**: Throughout 2025, security restriction codes and foreign fighter codes, which create serious suspicion and stigma against individuals, have not been subject to adequate judicial review through administrative courts. Decisions of non-prosecution, or acquittals issued by criminal courts, demonstrating that individuals were not involved in any crime or terrorism-related act, are likewise disregarded by the PMM. Even where a person was placed in administrative detention solely on the basis of such an allegation, they are not released from detention once the allegation is found to be unlawful. In some case files, individuals whose administrative detention was terminated have reportedly been re-apprehended by law enforcement shortly afterwards and placed back into administrative detention, with a deportation decision issued against them simultaneously. Similarly, it has been reported that in cases where a release decision was issued but the person had not yet been released and remained in an RC, documents were drawn up stating that the person had been re-apprehended "outside," despite the fact that they had not been released even for a brief period, which creates an endless loop.[16] In a documentary, legal practitioners stated that notes and codes placed on individuals by foreign intelligence agencies are treated with excessive weight by Turkish officials. This practice runs contrary to the basic principles of asylum, as it places undue reliance on precisely the type of information that may have driven the individual to flee their country of origin in the first place.[17]

- **Detention based on minor criminal records**: In late 2025, stakeholders reported a new practice whereby roughly 150 families, among them Syrian, Egyptian, and Palestinian nationals, were detained based on minor criminal records attributed to their children, in some cases dating back five or six years. These records involved low-level offences such as threats, insults, and motorcycle-related traffic violations. While stakeholders recognised that the authorities' underlying concern was likely the involvement of children in organised gangs, they characterised the practice as a clear breach of the presumption of innocence and the principle of individual criminal liability. It was seen as a further example of criminal and immigration enforcement being blurred together in ways that pushed at the limits of the non-refoulement principle.[18]

- **County of Origin Information (COI)**: The 2025–2028 EUAA–PMM Roadmap for Cooperation designates Country of Origin Information capacity development as a priority area, covering COI methodology training, identity and document verification, and the translation and dissemination of EUAA COI publications into Turkish to support asylum adjudication at both central and provincial levels.[19] Stakeholders, however, report that country of origin information is not given adequate weight in practice, as applicants face a high threshold to be recognised as in need of international protection.[20]

- **Increased number of rejection decisions:** PMM took 63,406 decisions in 2025, which constitutes a decrease compared to the 85,125 taken in 2024. The pattern of new applications remaining low while decision output stays high persisted into 2025, with the ratio between the two reaching a record low of 10.1%, reflecting PMM's apparent priority of clearing the existing backlog rather than accepting new applications. 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

16 İstanbul Barosu, 'İstanbul'daki Geri Gönderme Merkezleri: 2025 Yılına İlişkin Gözlem ve Tespitler', 20 June 2026, available here.
17 İdame Medya, *Boraltan köprüsü | Türkiye'de Mülteci Olmak*, 28 August 2026, available here.
18 Information provided by a stakeholder, April 2026.
19 EUAA, *Roadmap for Cooperation between the EUAA and Türkiye (2025-2028)*, June 2025, available here.
20 Information provided by multiple stakeholders, March, April and May 2026.

approval to accept cases, but they can reject applications independently based on their assessments.[21]

- **Judicial review of international protection cases:** As LFIP-related caseloads rose, several additional chambers were designated to handle the growing volume in Istanbul and Ankara. In 2025, five Istanbul courts (1st, 15th, 16th, 17th, and 18th Administrative Courts) and two Ankara courts (1st and 26th) handle LFIP cases, while the 1st Administrative Court remains the sole designated chamber elsewhere. In practice, the Istanbul and Ankara courts operate as de facto immigration courts. Stakeholders noted, however, that spreading LFIP cases across multiple Istanbul chambers has undermined consistency, with different courts reaching divergent conclusions on the same legal questions.[22]

Reception conditions

- **Reception of women**: In 2025, the intersection between poverty and GBV became increasingly visible, with women requesting shelter placement in the absence of physical violence, driven instead by economic hardship. Shelter officials reportedly apply stricter admission criteria to foreign women than to Turkish nationals: while Turkish women can be accepted on the basis of risk of violence alone, combined with a statement that they have nowhere else to go, foreign women are required to present valid identification and a formal complaint evidencing an actual incident of violence. Combined with existing barriers to registration and access to adequate housing, this disparity has further worsened the situation of affected individuals.

Administrative detention of asylum seekers and access to procedural safeguards

- **Detention facilities:** As of 2025, there are 32 removal centres operating across 25 provinces in Türkiye, with a total detention capacity of approximately 18,780. Throughout 2025, multiple reports[23] flagged serious concerns over the erosion of procedural safeguards, along with restrictions limiting both detainees and their lawyers from fully exercising their rights. Allegations included administrative detention and deportation processes proceeding unpredictably and arbitrarily, with inconsistent decisions on similar-profile detainees undermining legal certainty; centers frequently disregarding court-ordered releases or detainee-specific accommodations without seeking PMM approval, causing delays; ill-treatment complaints rarely advancing due to denied investigation permits or missing/incomplete camera footage; families and lawyers unable to locate detainees or determine which facility held them; lawyers barred from accompanying clients during international protection applications; courts routinely rejecting detention appeals without genuine review, even where family ties, health conditions, or child welfare warranted release; consular officials—particularly Afghan—allegedly discouraging detainees from pursuing legal remedies; opaque, undocumented release practices involving notarized guarantees arranged through intermediaries, applied inconsistently; unofficial detention/transfer sites lacking any legal status, with lawyers, interpreters, and relatives barred from access; broken lawyer-client communication systems (intercoms, glass partitions, absent translation lines); restricted numbers of simultaneous visits; suicides and deaths with severely limited information access.

- **Judicial review of administrative detention:** Judicial review of administrative detention before magistrates' courts remains largely ineffective in practice. Throughout 2025, decisions terminating

21 Information provided by multiple stakeholders, April and May 2025.
22 Information provided by a stakeholder, April 2026.
23 İstanbul Barosu, İstanbul'daki Geri Gönderme Merkezleri: 2025 Yılına İlişkin Gözlem ve Tespitler, 20 June 2026, available here.

administrative detention were extremely rare, with most profiles receiving no release decision at all. Individuals have continued to be detained despite clear legal grounds for release, including family ties, health conditions, the availability of alternatives to detention, or the best interests of the child. Lawyers have widely reported that magistrates dismiss detention appeals without reviewing their content. Separately, requests to lift administrative detention where a deportation decision is also in place are routinely rejected unless the deportation decision itself has been annulled, despite LFIP imposing no such requirement. In practice, annulment of the deportation decision has become a de facto precondition for release from an RC. Additionally, foreign nationals under criminal investigation or prosecution are automatically placed in administrative detention, and magistrates disregard favourable outcomes, such as non-prosecution or acquittal, when reviewing detention appeals.[24]

Content of international protection

- **Resettlement:** In 2025, UNHCR continued to expedite the resettlement processing of the most vulnerable refugees. As of February 2025, more than 43,815 Syrian refugees had been resettled from Türkiye to the EU under the 1:1 scheme. 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 in temporary accommodation centers (TAC):** Following a policy change in 2022, Syrians who enter the country are transferred to temporary accommodation centres. By the end of 2025 The remaining operational facilities are the Sarıçam TAC in Adana, the Nizip and Islahiye-2 TACs in Gaziantep, the Elbeyli TAC in Kilis, and the Harran TAC in Şanlıurfa. 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 forms.[25] 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 As of 2025, Nizip TAC has assumed a primary function in the processing of international protection applications in the south-east, a role previously associated with Harran TAC in 2024. Individuals whose international protection applications are received by the relevant Provincial Directorate of Migration Management are in practice referred to Nizip TAC for the duration of the procedure, without travel costs being covered. Decisions have been observed to be issued within approximately two to three months, the majority of which are negative, though a number of individuals have been granted international protection status.

[24] İstanbul Barosu, İstanbul'daki Geri Gönderme Merkezleri: 2025 Yılına İlişkin Gözlem ve Tespitler, 20 June 2026, available here.

[25] Global Detention Project, Türkiye: Submission to the Committee against Torture, 12 June 2024, available here

- **Apprehensions and changing enforcement practices**: Apprehensions of Syrian nationals for irregular status declined markedly over the review period. In 2023, Syrians accounted for approximately 58,621 of the 254,008 total apprehensions nationwide more than double the 2021 figure. This fell to 50,641 in 2024, and further to 22,515 in 2025.[26] Stakeholders attribute this decline to a shift in official attitudes towards Syrian nationals over the course of 2025: following the regime change in Syria in December 2024, forced returns were largely replaced by counselling and encouragement to pursue voluntary return.

- **Registration under Temporary Protection:** 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. In line with this policy, the regime change in Syria, and the public encouragement of voluntary returns, the number of Syrians under temporary protection decreased to 2,347,756 as of 2025.

Access to rights and support under the 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 Turkiye 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.[27]

- **Access to employment**: Widespread confusion between the exemption mechanism and the standard work permit procedure meant that awareness of the measure remained very low, only beginning to spread more broadly among the affected population by mid-2025. The extent of this lack of awareness became apparent in June 2026, when the Minister of Interior publicly announced the introduction of a work permit exemption for foreigners under temporary protection to support registered employment.[28] The announcement was widely reported as a new development, even though the measure had in fact been in force since October 2024.

- **Decreasing apprehensions of temporary protection beneficiaries**: By the end of 2025, there were 22,515 Syrians among the 160,253 people apprehended across the country.After the increasing trend seen between 2022 and 2024, this number reflects a reduced rate of apprehension of Syrians, matched by reduced public interest in capturing Syrians, with attention shifting instead toward encouraging voluntary returns.[29]

- **Access to social assistance and support**: Kızılaykart statistics indicate that those returning throughout 2025 were predominantly aid-dependent individuals. The number of ESSN beneficiaries fell from 995,742 in May 2025 to 672,337 in May 2026. A similar trend is evident in Temporary Accommodation Centres, which officials have reportedly sought to empty: the number of individuals receiving in-camp assistance dropped sharply from 31,559 in May 2025 to just 3,884 in May 2026.[30]

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26 PMM, Irregular Migration Statistics, available here.

27 European Commission, Commission signs €400 million agreement with Türkiye to support its recovery after the 2023 earthquakes, 07 February 2024, available here.

28 PMM, İçişleri Bakanı Mustafa Çiftçi Sivil Toplum Kuruluşları ile İstişare ve Değerlendirme Toplantısı'nda Bir Araya Geldi, 26 June 2026, available here.

29 PMM, *Irregular migration statistics*, available here.

30 Kızılaykart, Infografik, available here; see also AIDA, *Country report: Türkiye – Update on the year 2024*, July 2025, available here.

Introduction to the asylum context in Türkiye

Türkiye currently hosts a population of around 2,347,756 million refugees from neighbouring **Syria**[31] and 166,899 international protection applicants and status holders, most principally originating from **Afghanistan**, **Iran**, **Iraq**, and among others.[32] 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.[33] 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.[34] As of 29 October 2021, DGMM became the Presidency of Migration Management (PMM).[35]

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"[36] 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.

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31 Statistics

32 UNHCR Turkiye, 2025, available here

33 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.

34 UNHCR, 'Türkiye: Operational Update 2018 Highlights', available here.

35 Presidential Decree No 85 amending several presidential decrees, 29 October 2021, available in Turkish here

36 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'.

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.

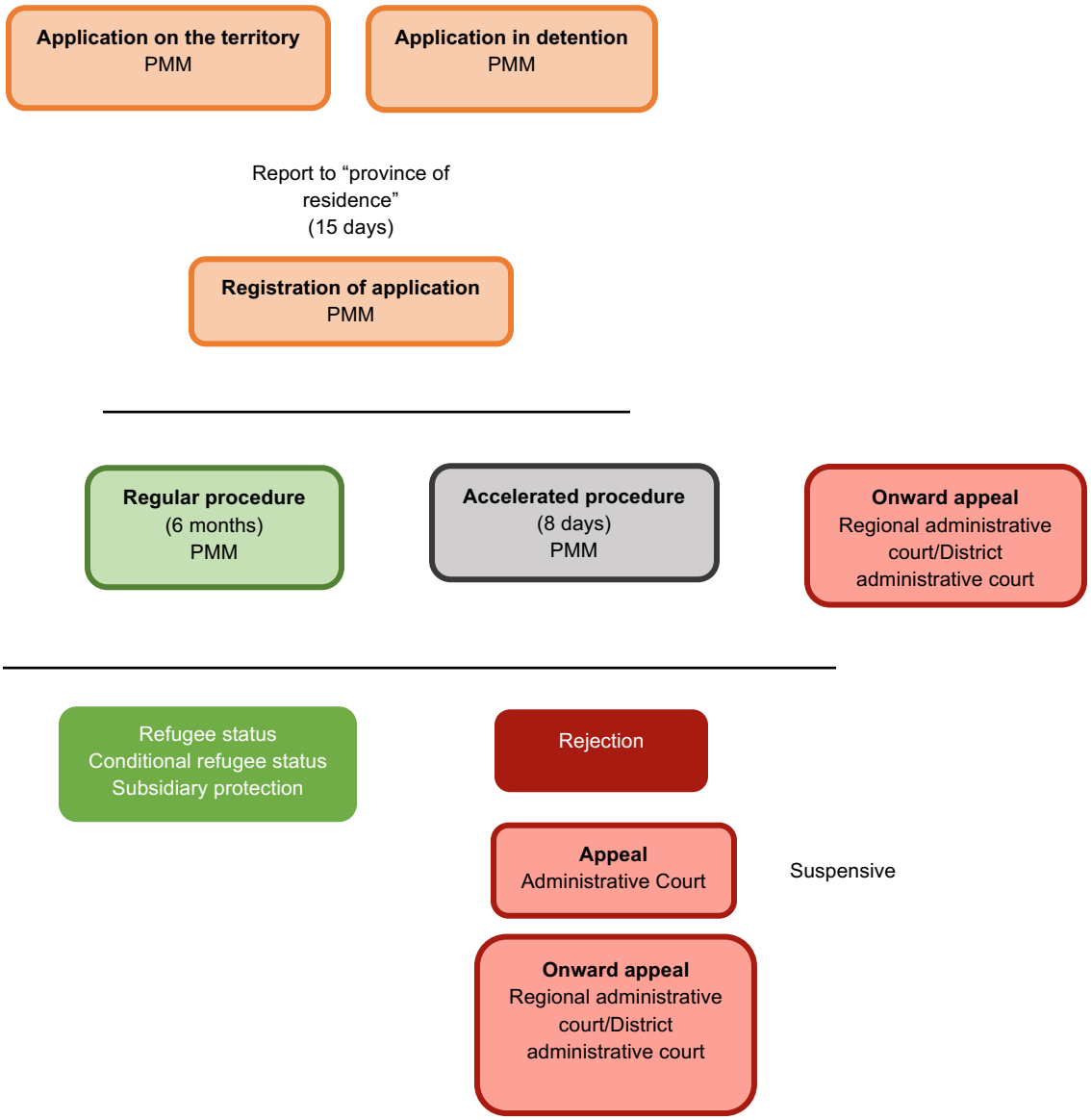
In line with the legislative framework, this report is divided into two sections, the first on international protection and the second on temporary protection.

Asylum Procedure

Asylum Procedure

A. General

1. Flow chart



2. Types of procedures

Indicators: Types of Procedures

1. Which types of procedures exist in your country?
   - ❖ Regular procedure: ☒ Yes ☐ No
     - ▪ Prioritised examination:[37] ☒ Yes ☐ No
     - ▪ Fast-track processing:[38] ☐ Yes ☒ No
   - ❖ Dublin procedure: ☐ Yes ☒ No
   - ❖ Admissibility procedure: ☒ Yes ☐ No
   - ❖ Border procedure: ☐ Yes ☒ No
   - ❖ Accelerated procedure:[39] ☒ Yes ☐ No
   - ❖ Other

2. 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
Returns (voluntary and forced)	Presidency of Migration Management (PMM)	Göç İdaresi Başkanlığı (GİB)

37 For applications likely to be well-founded or made by vulnerable applicants.
38 Accelerating the processing of specific caseloads as part of the regular procedure.
39 Labelled as “accelerated procedure” in national law.

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)	14,010[40]	Ministry of Interior	☒ Yes ☐ 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 responsibility of the respective PDMM.[41] The number of staffs working in provincial and district directorates is 14,010, and 1,103 staffs serve in the headquarters of PMM in Ankara.[42]

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 fifth roadmap for cooperation 2025-2028 in June 2025, which 'facilitates exchanges of best practices on asylum related- legislation, effective asylum procedures and reception system'.[43] According to the Annual Report, within the scope of projects financially supported and completed by international institutions and organisations, 15 projects including INNOVATIVE, INTERLINK, E-MOTION, EMPOWER, AVRR, Supporting PMMs on Management, Reception and Accommodation of Irregular Migrants – Phase II, Support to the Institutional Capacity of UKORAM, ENACT, Support to Enhancing Return Counselling Capacity in Türkiye II (ReCONNECT II), Appeal for Solidarity Bridge Project, Project on Enhancing Border Management Capacity at Türkiye's Eastern and Southern Borders, Strengthening the Effectiveness of National Asylum Procedures in Accordance with International Standards and National Legislation Project, N-AVRR – Support to the Implementation of the National Assisted Voluntary Return and Reintegration Programme in Türkiye and EU Support to Combating Trafficking in Human Beings in Türkiye and Child Protection Phase IV Projectshave been completed in 2025.[44] PMM publishes the both ongoing and completed projects regularly.[45]

In 2025, PMM published its performance programme and annual report based on the 2024-2028 Strategy Plan[46], providing for the details regarding its human resources, organisational structure, resources and performance indicators.[47]

Stakeholders mentioned that due to turnover among the staff especially in PDMMs, creating and maintaining sustainable dialogues with migration authority is sometimes challenging.[48] Beyond turnover, stakeholders also reported that even for the most routine matters, PDMM staff tend to seek approval from PMM before acting, making it difficult to obtain timely outcomes from PDMM offices, particularly decisions favourable to the foreign national concerned.[49] While this practice has reportedly existed to some extent for

40 PMM, Göç İdaresi Başkanliği Faaliyet Raporu 2025, available in Turkish here.
41 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.
42 PMM, Göç İdaresi Başkanlığı Faaliyet Raporu 2025, available here.
43 EUAA & PMM, 'Roadmap for Cooperation between the EUAA–PMM (2025-2028), June 2025, available here.
44 PMM, Göç İdaresi Başkanlığı Faaliyet Raporu 2025, available here.
45 PMM, Göç Projeleri, available here; PMM, Göç İdaresi Başkanliği Faaliyet Raporu 2024, p.47, available here.
46 PMM, Göç İdaresi Başkanlığı 2024-2028 Stratejik Plan, available here.
47 PMM, Göç İdaresi Başkanlığı 2025 Performans Programi, 2025, available in Turkish here.
48 Information provided by stakeholders, March – April 2024.
49 Information provided by stakeholders, March – April 2026.

a longer period, it has become markedly more pronounced in recent years whenever the outcome at stake is favourable to the individual. According to a report by the Istanbul Bar Association, approval from Ankara has reportedly become necessary even in cases where the law mandates the release of the person concerned.[50]

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 a specified period (such as 3, 7, or 14 days), where they are 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, 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 the referred province, as they could be treated as irregular migrants[51] and transferred to a 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.* [52] 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. Later in 2019, the suspensive effect of appeals against deportation orders for these three groups was reinstated. However, since 2018, a person falling within these three categories may be issued a deportation order at any stage of their international protection application, whereas other types of deportation orders cannot be issued to international protection applicants.[53]

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 used to take years.[54] Since 2024, a visible acceleration in the status determination of international protection applicants has been observed. This is reflected in the marked asymmetry between the number of new applications received and those concluded. In 2024, for instance, 9,009 new applications were registered, while 85,125 international protection cases were concluded.[55] In 2025, new applications stood at 6,430, with concluded cases at 63,406. Although the underlying motivation is not explicitly stated, the volume of rejection decisions, taken together with the authorities' broader stance on access to healthcare, suggests that the aim has been to reduce the number of individuals who retain the right to access healthcare, or at least their practical chances of accessing it. Once a rejection is issued, accessing healthcare becomes, in most cases, virtually impossible (See: Reception Conditions). 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

50 İstanbul Barosu, İstanbul'daki Geri Gönderme Merkezleri 2025 Yılına İlişkin Gözlem ve Tespitler, 20.06.2026, available here.
51 Information provided by stakeholders, March – April 2024.
52 Constitutional Court, Decision 2016/22418, 30 May 2019, available in Turkish here.
53 Article 54/2 of LFIP.
54 Information provided by stakeholders, March – April 2024.
55 PMM, 2026 Performans Programı, available here.

negative decisions under the accelerated procedure and inadmissibility decisions have to be filed within 7 days, a deadline often logistically impossible to meet in practice.

Negative decisions in the regular procedure can be challenged before the International Protection Evaluation Commission (IPEC) within 10 days or directly before 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, wow 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 2025, from 225,831 to 160,253. One of the main reasons mentioned by authorities is increased border controls. The percentage of Afghans among those considered as irregular migrants decreased from 29% to 27,5% in 2025, and Afghanistan remained the top nationality of persons apprehended for irregular migration in 2025 with 44,157 Afghan nationals. As in the previous year, in 2025, Syrians were the second highest nationality among those registered as irregular migrants (22,515). The other main nationalities were Uzbekistan, Turkmenistan, Iran, Morocco, Iraq, Egypt, Sudan and Yemen. This represents a slight decrease in the total number of irregular migrants apprehended from 2024, and is still far from 2019 (454,662) which had seen the highest number since records began.[56]

In 2025, 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.[57] Registered migrants attempting to cross lose their rights in Türkiye due to the inactivation of their IDs. A qualitative study covering both registered and unregistered Afghan and Iranian migrants in Türkiye, based on an online survey of 193 participants, three focus group discussions, and five in-depth interviews with individuals who had already left through unsafe routes, reveals that unsafe departure routes are not a choice, but a structural inevitability driven by economic hardship, fear of deportation, discrimination, and

56 PMM, *Irregular migration statistics*, available here.
57 Information provided by a stakeholder, April 2025.

the absence of viable alternatives, with legal instability, rising rejection rates, and their knock-on effects on access to healthcare, education, and employment lying at the core of migrants' vulnerability.[58]

Eastern borders

Türkiye constructed a wall on its Iranian border in 2018-2019.[59] The wall includes trenches and fences, with an increasing number of watchtowers and surveillance technologies such as unmanned aerial vehiclesAs of October 2025, security walls have been completed along approximately 87 percent of the Syria and Iran borders, totalling 1,274 kilometres, alongside 1,275 kilometres of patrol roads along the same lines. Across all land borders, patrol roads now extend to 1,700 kilometres, covering roughly 58 percent of the country's 2,949-kilometre land border. Construction continues along the Van segment of the Iranian border, where 26 kilometres of the planned 92-kilometre stretch had been completed by October 2025. On the Iraqi border, physical barriers and patrol roads have been completed along 25 and 26 kilometres respectively, with an additional 13 kilometres still underway. Surveillance infrastructure has been further consolidated, with 223 watchtower systems installed along the eastern and southeastern borders by October 2025. In addition, 341 electro-optic towers, 250 of which are on the eastern borders, have been established, enabling monitoring of 740 kilometres of the eastern border with high-capacity thermal cameras, elevator towers, armoured surveillance vehicles, and seismic sensor systems.[60] 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.[61] There is no official information about how many migrants are affected regarding their nationality and which border.

In a statement delivered in December 2024, 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 for 2024.[62] According to the PMM's 2025 activity report, 113,261 individuals were deported during the year, against a stated target of 150,000.[63]

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 oversight[64].

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 deportation ("T1") forms,[65] or being pushed back without being provided any official form.[66] 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

58 AHCSA, *Afghanistan Hazaras Culture and Solidarity Association, Multi-Dimensional Assessment of the Situation of Afghan and Iranian Refugees in Turkey and the Factors Influencing Their Inclination Toward Unsafe Migration to Europe*, November 2025, available here.

59 TRT, 'Wall set to improve security along Türkiye-Iranian border', 8 November 2018, available here.

60 AA, Türkiye'nin kara sınırlarının yaklaşık yüzde 44'üne güvenlik duvarı örüldü, 30.10.2025, available here.

61 Information provided by stakeholder, March – April 2024.

62 Gazete Duvar, Yerlikaya açıkladı: Türkiye'de 2 milyon 938 bin Suriyeli mülteci var, 04.12.2024, available here.

63 PMM, *Faaliyet Raporu 2025*, available here.

64 Information provided by stakeholder, March – April 2024.

65 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.

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

been issued, the officials are unlikely to agree to process the person's international application and the deportation decision can only be challenged by a judicial appeal.[67]
In 2025, individuals pushed back into Iran continued to face the risk of being left stranded in the mountainous terrain between Iran and Türkiye. As in 2024, 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.[68]

Afghanistan nationals, in particular, were reported as facing significant discrimination upon return to Iran, according to several stakeholders. Due to fear of such treatment, many individual from Afghanistan repeatedly attempted 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.[69] In 2025, stakeholders noted that Van (Kurubaş) RC operates with a rapid turnover rate. Despite functioning significantly above capacity, spaces created by removals are reported to be filled almost immediately. During certain weeks, two charter flights to Afghanistan were operated.[70]

In Van, it is reported[71] that undocumented Afghans caught in the city or while traveling to western parts are detained in 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 detained after requesting a change in their registered province, and was held — alongside others — in unofficial detention facilities rather than formal removal centers. The group was subsequently transported to the border and compelled to cross into Iranian territory by armed Turkish officials. A formal complaint was filed regarding the incident; however, the relevant Governorship declined to grant authorisation for an investigation.[72]

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 frostbite.[73] Usually, they are detected by drones, due to the high level of snow during winter times. In early 2025, another individual suffering from hypothermia was rescued, in addition to two others who had been saved in previous incidents.[74] 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.

67 Information provided by a stakeholder in April 2025.
68 AP, At least 1.2 million Afghans forced to return from Iran and Pakistan this year, says UN, 28.06.2025, available here
69 Information provided by stakeholders, March and April, 2025.
70 Informaiton provided by multiple stakeholders, April 2026.
71 GAR Report No. 9, Actors and Mechanisms of (Non-)Reception of the Afghans in Turkey, October 2023, available here.
72 Information provided by a stakeholder, March 2025
73 Information from a stakeholder, March 2024.
74 Van Barosu Göç ve İltica Komisyonu (@Vaniltica) / X (twitter.com) available here.

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.[75] Crossings are only allowed for individuals who require specific medical treatments and their attendants, for the duration of the treatment period.[76] According to stakeholders, in 2025, the construction of a border wall along the Iran–Türkiye border has redirected irregular crossing routes towards mountainous and more hazardous terrain where the wall remains incomplete. Stakeholders observed that this shift has resulted in significantly more dangerous crossings, with reports of individuals sustaining cold-related injuries during their journey.[77]

On 8 March 2026, an Afghan national was allegedly shot in the back and killed by Turkish law enforcement in the Özalp district of Van province, a primary border crossing point for irregular migrants entering Türkiye from Iran. The Van Bar Association's Migration and Asylum Commission, which visited the Chief Public Prosecutor's Office to monitor the investigation, noted serious contradictions in the statements of the officers involved.[78] In the period leading into 2026, stakeholders further noted a considerable intensification of security measures along this border, which they linked to heightened regional instability following military strikes on Iran.[79] In early March 2026, Turkish authorities temporarily suspended border crossings between Iran and Türkiye during the initial days of the strikes, before resuming normal operations approximately a week later.[80]

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 by another 35 kilometers and ultimately wants the five-meter high steel fence on the Evros River (Meric) along most of the 192-kilometer border.[81] 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. In 2025 the Governor of Edirne announced plans to build 8.5 kilometers of border wall, which may eventually be extended along the entire border.[82] Construction of 21 surveillance towers (17 equipped with cameras, 4 designated for communications) along the Kırklareli–Bulgaria border has been completed. Data for this project is sourced from both the Kırklareli Governorate and ASELSAN.[83]

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 in 2024 that 78% of apprehensions were carried out before migrants reach the border zone.[84]

75 Information provided by a stakeholder, March 2024.
76 Ibid.
77 Information provided by a stakeholder, April 2026.
78 Van Barosu İnsan Hakları Merkezi Göç ve İltica Komisyonu, 12.03.2026, available here.
79 Information provided by a stakeholder, April 2026.
80 AA, Türkiye-İran sınırındaki gümrük kapılarında günübirlik yolcu geçişleri durduruldu, 02 March 2026, available here; Yeniçağ, Türkiye - İran sınırında hareketlilik: Sınırdan geçişler başladı, 10 March .2026, available here.
81 Info Migrants, Greece expands border fence with Turkey and urges EU support - InfoMigrants, 23 January 2023, available here.
82 Anka, Edirne Valisi Yunus Sezer: “Yunanistan sınırına 8,5 kilometre duvar yapılacak”, 04 March 2025, available in Turkish here.
83 PMM, *Faaliyet Raporu 2025*, available here.
84 T.C. Edirne Valiliği, Vali Sezer, “Yakalamaların yüzde 78’ini sınır hattına gelmeden gerçekleştiriyoruz”, 28 April 2024, available here.

According to a report published in February 2026 by a coalition of seven organisations the Bulgarian Ministry of Interior reported that between January and December 2025, 15,421 persons attempted to cross the Bulgarian-Turkish border irregularly, of whom 1,774 were detained by Bulgarian authorities, 79 by neighbouring border authorities, and 13,568 were recorded as having "returned independently to the interior of neighbouring countries." The authors treat this official figure as a de facto admission of pushback numbers, noting that there is no independent monitoring mechanism in Bulgaria capable of verifying whether such returns comply with human rights standards, and that local NGOs and grassroots organisations report that the vast majority of these cases in practice involved pushbacks from Bulgarian territory.[85] In November 2025, the NGO No Name Kitchen published a submission for the Universal Periodic Review of Bulgaria documenting the systematic use of pushbacks, reporting that these practices were increasingly accompanied by violence, including dog attacks, forced undressing, and beatings with rubber batons.[86]

As in previous years, the main route of crossing has been to Greek islands. There have been reports of pushback in the Aegean from **Greece** to Türkiye for several years.

According to RSA Aegean, a minimum of 53 deaths and 3 missing persons were recorded across 10 incidents on the Turkish side of the Aegean Sea in 2025.[87] According to the Turkish Coast Guard Command, a total of 20,078 irregular migrants were apprehended across 767 irregular migration incidents in 2025, including 3,192 migrants pushed back or thrown into Turkish waters by Greek forces across 116 separate incidents.[88] According to a separate source, the Turkish Coast Guard Command rescued 8,453 people and recovered the bodies of 165 individuals.[89] Incident reports from October and November 2025 illustrate the continued pattern of activity in the Aegean: on 16 October, 33 migrants pushed back by Greece into Turkish waters were rescued off Karaburun, while a further 27 were intercepted off Çeşme;[90] on 12 November, 14 migrants whose boat had been pushed back by Greek forces off Seferihisar were rescued, and 38 others were apprehended, including 11 children.[91] The trend regarding multiple crossing attempts and Greek pushbacks into Turkish territorial waters continued throughout 2025. From January to October 2025, UNHCR distributed 50,637 core relief items, including baby food, water, hygiene products, and clothing, through border authorities and Gendarmerie in Edirne, İzmir, Balıkesir, and Muğla to individuals who had been rescued. However, UNHCR noted that due to funding constraints, this assistance will be phased out once current stock is exhausted.[92] The diversity of nationalities among those attempting the crossing was illustrated in late November 2025, when a group of 17 people from Guinea, Cameroon, Yemen, Mali, Sierra Leone, Somalia, Azerbaijan, and Senegal were rescued as their boat sank off Mordoğan; one person died during the crossing and one remained missing.[93]

According to Turkish Coast Guard, 639 smuggling organizers were apprehended along the Greece route in 2025, while a further 147 were detained along the Italy route.[94]With the amendment made to Article 79,

85 11.11.11 (Belgium), the Hungarian Helsinki Committee, We Are Monitoring Association (Poland), the Centre for Peace Studies (Croatia), the Lebanese Center for Human Rights, Sienos Grupė (Lithuania), and I Want to Help Refugees (Latvia), *Beaten Back at Europe's Borders 2025 Annual Report on Pushbacks*, February 2026, available here.

86 NNK, *Submission for the Universal Periodic Review of Bulgaria*, November 2025, available here.

87 RSA Aegean, 'At least 98 refugees dead or missing at Greece's maritime borders in 2025', 16 March 2026, available here.

88 Sahil Güvenlik Komutanlığı, 2025 Yılı İdari Faaliyet Raporu, available here.

89 Daily Sabah, Türkiye's coast guard rescues over 8,000 people in 2025, 04.01.2026, available here.

90 Daily Sabah, Turkish coast guard rescues 33 irregular migrants off Izmir coast, 14.10.2025, available here.

91 Daily Sabah, Turkish coast guard stops 38 irregular migrants, rescues 14 off Izmir, 12.11.2025, available here.

92 UNHCR Türkiye, Monthly Operational Update, November 2025, available here.

93 UNHCR Türkiye, Monthly Operational Update, December 2025, available here.

94 Sahil Güvenlik Komutanlığı 2025 Yılı İdari Faaliyet Raporu, available here.

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. However, there have been no changes regarding the fines.

Along the Italy route, Turkish Coast Guard Command units apprehended 1,374 people and 63 smuggling organizers across 23 incidents in 2025. In a further 14 incidents handled jointly with other law enforcement agencies, an additional 683 people and 84 smuggling organizers were detained.[95]

On 1st of April, 2026, nineteen Afghan nationals, including an infant, died after a rubber dinghy sank off the coast of Bodrum.[96]

It is worrying that, like 2024, among the people who attempted to cross to Europe in 2025, the number of people who have been registered in Türkiye and lived there for longer periods increased.[97] These people 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. In 2025, stakeholders observed a growing trend of applicants opting for irregular departure immediately following a first-instance rejection decision, even where legal avenues for appeal remained available. The risk of losing access to medication and education — compounded by the absence of legal and financial support — was cited as a key driver of this decision. Notably, stakeholders reported that the same individuals, despite having been subjected to violent pushback practices, continued to attempt irregular departure on multiple occasions.[98] 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.[99] 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.[100]

In a decision dated 26 March 2025 (Application No. 2021/6018), the Constitutional Court found a violation of the right to life in connection with the death of a relative of the applicant, who perished when a Coast Guard patrol vessel collided with a boat carrying 56 persons near Dikili. The investigation, conducted by the Dikili Public Prosecutor's Office, concluded without prosecution on the grounds that the Coast Guard personnel could not have detected the migrant vessel in the dark due to its lack of lights and radar reflectors. The Court held that the investigation failed to meet the standards of an effective inquiry, as it did not adequately address the fault attributions detailed in the expert report, including negligence on the part of the patrol boat crew, the authorising administration, and the Coast Guard Command as operator of the vessel.[101]

The Afghanistan Hazaras Culture and Solidarity Association (AHCSA) report documents a strong correlation between legal status and the tendency toward irregular onward migration. Among undocumented respondents, approximately 62 per cent had attempted to leave Türkiye through irregular routes at least once, a figure exceeding 50 per cent among those with rejected cases. Although not explicitly addressed in the report, rejected applicants increasingly faced restrictions on access to social rights, a trend

95 Sahil Güvenlik Komutanlığı, 2025 Yılı İdari Faaliyet Raporu, available here.
96 BBC Türkçe, Bodrum açıklarında Afgan göçmenleri taşıyan bot battı: Biri bebek en az 19 ölü, 01 April 2026, available here.
97 Information provided by stakeholders, April 2026.
98 Information provided by multiple stakeholders, March and April 2026.
99 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.
100 Information provided by multiple stakeholders, February, March and April 2025.
101 T.C. Anayasa Mahkemesi, S.A. Başvurusu (Başvuru No: 2021/6018), 26 March 2025.

that reportedly worsened throughout 2025. While rejected cases do not necessarily fall within the undocumented group, they may be considered alongside undocumented individuals due to similar structural vulnerabilities and pressures. The report identifies three principal structural drivers: fear of arrest or deportation, exclusion from the formal labour market, and a legal dead-end in which neither lawful stay nor legal onward migration is available. Cross-tabulations confirm that undocumented individuals and those with rejected cases are almost entirely confined to informal employment without contracts. Institutional support structures provide limited relief. The primary reasons cited for wanting to leave were fear of deportation (127 cases), absence of future prospects (101 cases), economic hardship (99 cases), lack of access to healthcare (86 cases), discrimination or insecurity (70 cases), and lack of access to children's education (64 cases).[102]

The Facility for Refugees in Türkiye funded two projects under the first tranche for a total of EUR 80 million, both of which have since been completed. The first project provided EU support to strengthen the search and rescue capacity of the Turkish Coast Guard, while the second aimed to support the Presidency of Migration Management in its management of returns from the EU.[103]

For further information see also the AIDA report on Greece.[104]

1.2 Access at the airport

Airports in **İstanbul** (Sabiha Gökçen and İstanbul) continue to serve as key international hubs for connection flights from countries of origin of refugees to European and other Western destinations for asylum. Since 2019, the main airport is İstanbul Airport.

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 2025 it continued 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 represents a persistent gap in the oversight of the asylum system, as there is no mechanism to record, monitor, or address failed application attempts at airports. 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.

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102 AHCSA, *Multi-Dimensional Assessment of the Situation of Afghan and Iranian Refugees in Turkey*, 29 November 2025, available here.

103 European Commission, Ninth Annual Report on the Facility for Refugees in Turkey, 25 September 2025.

104 AIDA, *Country Report: Greece – Update on the year 2025*, July 2026, available here.

Meetings with lawyers take place in a publicly accessible space, without any attorney-client privacy.[105] According to stakeholders, in 2025, 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, continued to be challenging.[106]

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 that people were kept in a place with no windows, no ventilation, with the lights on 24 hours for nine months, with only cold airline sandwiches given to eat.[107]

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 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.

Like 2024, in 2025, stakeholders confirmed that it was 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.[108] Access to transit zones at **İstanbul** airport remains a problem. Even if the person contacts an NGO or a lawyer, the transit zone administrator frequently does not inform lawyers and NGOs accurately.[109] 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." 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.[110]

In 2025, stakeholders reported a series of cases at Istanbul Airport (IST) and Sabiha Gökçen Airport (SAW) involving individuals seeking access to international protection. At Istanbul Airport, two nationals of the Central African Republic were unable to have their applications registered and were subsequently removed from the country. A Cameroonian national was able to lodge an application, however during the appeal process airport officials sought to persuade the applicant to voluntarily depart to Singapore, raising concerns regarding the integrity of appellate procedures. A second Cameroonian national was swiftly deported before any examination of their claim could take place. An Ivorian national similarly sought to apply but was unable to sustain the process due to inadequate reception conditions. Five further individuals, three Sudanese nationals, one Guinean national, and one Palestinian national with reported health problems, were also present at the airport in the context of protection proceedings, though no further details on their procedural outcomes were reported. At Sabiha Gökçen Airport, a Sudanese national was able to lodge an application, received a negative decision, and subsequently appealed before an administrative court, one of the few documented instances of access to judicial review in airport proceedings in Türkiye.

105 Information provided by a stakeholder, March 2024.
106 Information provided by a stakeholder, March 2026.
107 Information provided by a stakeholder, May 2023.
108 Information from a stakeholder, May 2023.
109 Information provided by a stakeholder, April 2023.
110 Information provided by a stakeholder, March 2024.

A Palestinian national at the same airport was unable to apply for international protection as the authorities refused to receive the application. It is unclear what happened after because the individual stopped to inform the ones they have been receiving counseling.[111]

According to stakeholders, the main difference between asylum practices at Istanbul Airport and Istanbul Sabiha Gökçen Airport lies in the volume and origin of flights. Istanbul Airport handles a much higher number of flights, particularly from African countries, and its authorities are consequently more experienced in asylum procedures. This greater experience is a mixed blessing: it can also mean officials are more practiced at unlawfully refusing to register applications. Sabiha Gökçen, by contrast, receives mostly flights from Europe, not typically a region of origin for asylum seekers, so its officials have comparatively little experience with such procedures. As a result, an application arriving there stands a better chance, purely by circumstance, of being registered and lawfully processed, simply because the receiving official lacks the experience to professionally refuse it.

On 20 August 2025, by the Human Rights and Equality Institution of Türkiye (TİHEK) conducted a monitoring visit to the Inadmissible Passengers Room at Istanbul Airport, examining conditions against national and international standards.[112] According to its report, none of the rooms in the facility have windows or access to natural light or open air, relying entirely on artificial lighting and a centralised ventilation system. There is no designated smoking area, with occupants reportedly using toilet facilities to smoke instead. No complaints box is available, and a number of emergency call buttons and room telephones intended for communication with staff were found to be non-functional. Meetings with lawyers take place in the passport control area, in rooms equipped with audio recording devices, raising confidentiality concerns. TİHEK further noted that access to the adjacent Transfer Centre, established in July 2024 partly to allow individuals held for extended periods to benefit from more adequate conditions, remains limited in practice, with the recommendation that inadmissible passengers held beyond 24 hours be transferred there only partially implemented. The Institution also observed that meal delivery schedules provided by airline carriers do not consistently align with mealtimes, and recommended greater variety in the menus supplied. At the time of the visit, no one at the Transfer Centre had lodged an application for international protection; the 63 individuals present, 26 women and 37 men, were all voluntary returnees from removal centres, though TİHEK noted that applicants for international protection can remain at the Centre for extended periods. Notably, the report does not address the difficulties migrants may face in accessing the international protection procedure itself, focusing instead on physical conditions and safeguards within the facility.[113]

In a decision issued on 29 July 2025, the Constitutional Court found violations of both the substantive and procedural dimensions of the prohibition of treatment incompatible with human dignity in a case concerning the forcible removal of a Cameroonian national from Istanbul Airport. Although the applicant did not seek international protection, the case illustrates the treatment to which individuals processed as inadmissible passengers and subjected to forced removal at Istanbul Airport may be exposed. The applicant alleged that during multiple attempts to place him on flights back to Cameroon between 21 and 30 January 2020, he was subjected to physical violence, including beatings with a baton; that on 27 January 2020 he was stripped to his underwear, bound to a wheelchair with his hands in plastic handcuffs, wrapped from head to toe in stretch film, and had his mouth covered with a cloth or medical mask sealed with adhesive tape, rendering breathing difficult and creating a risk to his life; and that he was then forcibly carried to the rear seat of an aircraft in this condition. Passengers on board filmed the incident, which subsequently circulated

111 Information provided by multiple stakeholers, January and February 2026.

112 TİHEK, *İstanbul Havalimanı Kabul Edilemeyen Yolcu Bekleme Alanına Habersiz Takip Ziyareti*, 22.08.2025, available here.

113 TİHEK, *Istanbul havalimani kabul edilemeyen yolcu bekleme alani takip ziyareti raporu*, 2026/345, available here.

on international media. The Court found that, while handcuffing alone might have constituted a reasonable measure given the applicant's resistance, the additional measures, in particular the stretch film wrapping, the taped mouth, and the public exposure in a state of near-undress, were manifestly excessive and degrading. The Court further found that the criminal investigation into the applicant's complaints had been ineffective, relying solely on evidence gathered during the administrative inquiry without independently examining witnesses or camera footage. One member of the Court, in a concurring opinion, argued that the treatment should have been characterised not merely as treatment incompatible with human dignity but as ill-treatment reaching the threshold of torture, given the severity of the physical and psychological suffering caused by the restriction of the applicant's breathing and the prolonged nature of the ordeal.[114]

In 2025, while notary services at the nearest Removal Center (Arnavutköy) reportedly cost around 3,000 TRY, this process proved far more complicated at Istanbul Airport. In most cases, applicants also require translation, and as a sworn translator is mandatory for notarial procedures, the total cost rises to approximately 6,000 TRY for those held at Arnavutköy RC. For applicants at the airport, fees may reach up to 10,000 TRY, as translators set their charges based on the distance of the facility but also taking into account the frequency of visits required.[115] In 2024, 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.[116]

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.[117] 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.[118] Law No 7070 on 1 February 2018 consolidated the reform.

Stakeholders reported that this provision is applied discretionarily, particularly against international protection applicants subject to deportation orders issued on public order or public health grounds under Article 54(1)(d) of the LFIP. When such cases come before the courts, the vagueness of the provision makes it extremely difficult for applicants to obtain annulment of the deportation order.[119] 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.[120] In 2020, a new regulation on Penal Execution Institutions introduced Article 52, which established the procedural framework governing the

114 Anayasa Mahkemesi, E.F.S.C. Başvurusu (Başvuru No: 2021/3248), 29 July 2025.
115 Information provided by a stakeholder, March 2026.
116 Inormation provided by a stakeholder, May 2025.
117 Article 80(1)(e) LFIP.
118 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.
119 Information provided by a stakeholder, April 2026.
120 Article 77 Regulation No 28578 on Conditions of Probation, 5 March 2013, as amended by Article 1 Regulation No 30631 of 20 December 2018.

deportation of convicts, including coordination mechanisms between prison administrations, law enforcement, and immigration authorities, with the Ministry of Interior holding overall assessment authority over deportation procedures.[121] However, stakeholders reported that in practice, foreign nationals admitted to prison are automatically issued a deportation order which cannot be enforced until their release and transfer to a removal centre, by which point the seven-day statutory time limit for challenging the decision has long expired, effectively foreclosing any meaningful legal remedy.[122]

Procedural and financial aspects of removal

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”.[123]

In 2025, a case involving a Moroccan national illustrated the practical implications of this provision. The individual had 600 Euros in their possession at the time of apprehension, which was taken into custody upon detention. Following deportation, the individual's lawyer inquired about the funds held in custody, and officials responded that where an applicant has money held in custody, travel expenses are to be deducted from that amount. However, no documentation was provided as to the actual cost of removal, nor was it clarified whether the amount held was sufficient to cover those costs or whether any remainder was returned to the individual.[124]

Safe third country and country of removal practice

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 the risk of refoulement is assessed based on this assumption. However, there are some positive decisions which highlight the non-specification of country of removal as problematic. In 2024, the Şanlıurfa Administrative Court found a deportation decision of a Syrıan 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 *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 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.[125]

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

121 Ceza Infaz Kurumlarinin Yönetimi Ile Ceza Ve Güvenlik Tedbirlerinin Infazi Hakkinda Yönetmelik, RG: 29.03.2020/31083.
122 Information provided by a stakeholder, April 2026.
123 Aricle 60/3 (l) LFIP.
124 Information provided by a stakeholder, March 2026.
125 T.C. Şanlıurfa 1. İdare Mahkemesi 2024/311 E., 2024/1773 K., T: 30.09.2024.

order.[126] However, this practice might result in the cancellation of international protection and prevents individuals from re-applying for international protection.[127] In 2025, the PMM continued to designate Germany, Micronesia, Ecuador and Haiti as safe countries of origin for both Syrian and non-Syrian nationals. According to stakeholders, no individual was deported to one of these countries.

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.[128] The Istanbul 15th Administrative Court, in a decision concerning a Palestinian national, accepted Germany as a safe third country without examining whether the applicant had any realistic prospect of accessing it, including whether he held the necessary visa or travel documentation.[129] According to the stakeholders, this approach reportedly extended to the hearings themselves, where judges designated Germany as a safe third country without questioning this precondition.[130]

In 2025, Istanbul 16th Administrative Court annulled[131] the deportation order of an Afghan national, and in 2026 that of a Syrian national[132], on the grounds that the deportation orders failed to specify a safe third country to which the individuals were to be removed.

Two further cases communicated by the Court in December 2025 raise serious questions about the adequacy of Türkiye's safe third country assessments. In *K.A. v. Türkiye*, a Syrian national facing deportation on national security grounds was issued a deportation order specifying Ecuador as the designated safe third country, or, alternatively, voluntary return to Syria. In *A.H. v. Türkiye*, a Syrian national who had been granted temporary protection was similarly issued a deportation order designating Malaysia as the safe third country, a country with which he had no established ties whatsoever. In both cases, the Court directed questions to the parties concerning whether the domestic authorities had conducted an adequate safe third country examination — in particular, whether Ecuador and Malaysia respectively offer sufficient procedural guarantees to prevent chain refoulement to Syria.[133]

Türkiye as a designated safe third country: european practice and case law

Despite the Greek Council of State's annulment of the Joint Ministerial Decision designating Türkiye as a "safe third country," the Greek government issued a new, substantively similar Joint Ministerial Decision on 9 April 2025, before the annulment judgment had even been published, re-designating Türkiye as a "safe third country" for asylum seekers from Syria, Afghanistan, Somalia, Pakistan, and Bangladesh. RSA and GCR characterised this as a violation of the principles of legality and legal certainty and of the administration's constitutional obligation (Article 95(5)) to comply with judicial decisions. The Council of State had also unanimously upheld individual annulment applications, citing the CJEU's judgment in Case C-134/23 and confirming that, as long as Türkiye continues to generally suspend readmission of international protection applicants, a suspension in place since March 2020, Greek authorities may not reject applications as inadmissible on safe-third-country grounds. The Ministry of Migration and Asylum's claim that the new Decision would enable "immediate rejection" and return of asylum seekers was disputed

126 T.C. Bursa 1. İdare Mahkemesi, 2024/17 E., 2024/654 K., 28.05.2024 T.
127 Information from a stakeholder, May 2023.
128 T.C. İstanbul 18. İdare Mahkemesi 2024/3898 E., 2025/1922 K., T: 30.04.2025.
129 T.C. İstanbul 15. İdare Mahkemesi 2025/4785/E., 2026/1086 K., T: 31.03.2026.
130 İstanbul Barosu, Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler, 20.06.2026, available here; Information provided by a stakeholder, April 2026
131 T.C. İstanbul 16. İdare Mahkemesi 2025/300 E., 2025/3020 K., T: 30.05.2025.
132 T.C. İstanbul 16. İdare Mahkemesi 2026/438 E., 2026/900 K., T: 11.03.2026.
133 ECHR, Application Nos: 13754/25, 20237/25; Both communicated on 16 December 2025.

by RSA as factually inaccurate, since no returns to Türkiye had taken place under the previous, materially identical decisions either. The organisations noted that the practice leaves persons in clear need of international protection, including families with children and vulnerable individuals, in prolonged legal limbo without protection or access to reception conditions, and announced they would pursue judicial review of the new Decision.[134]

Security restriction codes and deportation regime

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.[135] 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 **İstanbul**.[136] The assessment of risks, conducted by the Risk Analysis Department as far as airports are concerned,[137] 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.[138] 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.[139]

Security codes can be only appealed before the Administrative Courts 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.[140] The court generally leaves a wide margin of discretion to PMM regarding the issuance of codes and courts generally upload the designations.[141] In practice, where a deportation order is based on a security code, two separate cases must be filed: one challenging the deportation order before the competent administrative court, and another challenging the security code itself before the Administrative Courts of Ankara.

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 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.[142]

The application of security restriction codes continued unchanged in 2025, though the year saw notable divergence in how courts across jurisdictions handled cases where deportation orders were grounded in

134 RSA, New designation of Türkiye as a "safe third country" for refugees in defiant contempt of the Greek Council of State's ruling, 14 April 2025, available here.
135 Information provided by multiple stakeholders, May 2023.
136 Information provided by a stakeholder, May 2022 and March 2024.
137 Karar, 'Risk analiz merkezi kapılarını KARAR'a açtı', 28 April 2016, available in Turkish here.
138 Information provided by a stakeholder, May 2023.
139 Information provided by a stakeholder, May 2023.
140 Information provided by a stakeholder, May 2023.
141 For further details on positions of courts in previous years, see previous updates to this country report, available here.
142 Mazlumder, Göç Politikasını Beraber İyileştirelim, 20.06.2025, available here.

such codes, and stakeholder accounts pointed to a broader pattern of judicial review having become effectively non-functional in practice.[143]

A significant procedural shift was observed in İzmir, where the First Administrative Court, which had previously taken an active role in examining security codes, issuing interlocutary decisions (*ara karar*) requesting justification from the administration in deportation cases involving the G-87 code even in the absence of a separate annulment action, reversed this practice and began issuing direct rejections without such inquiry. Stakeholders noted that this court had previously been more proactive than its peers; its alignment with a more restrictive approach marks a deterioration in access to judicial scrutiny in the region. In Samsun, the administrative court similarly declined to treat a pending security code annulment case as a preliminary issue in deportation proceedings. The court cited the amendments introduced to Article 53 of Law No. 6458 as imposing an obligation to process cases expeditiously; practitioners considered this interpretation to be incorrect, as the legislative change does not in fact impose such an obligation, and view the court's reliance on it as a misreading of the provision.[144]

Other administrative courts across Türkiye more broadly were reported to rely on the presence of visible open investigations in the UYAP case management system as a basis for direct rejection, without awaiting the outcome of those investigations or of any pending security code proceedings. İstanbul Administrative courts were noted to apply a somewhat more thorough review in cases involving pending investigations. Nationality-based disparities in outcomes were also reported: while cases involving Syrian and Iraqi nationals with G-87 codes were consistently resulting in rejection, courts were observed to grant annulments in cases involving Palestinian nationals carrying the same code, suggesting that the assessment of the security designation is influenced by the applicant's nationality rather than the content of the code itself.[145]

The Administrative Courts of Ankara, which retain exclusive jurisdiction over security code annulment cases, continued to exhibit a highly deferential posture toward PMM. Stakeholders described the 1st and 26th Administrative Courts of Ankara as routinely upholding designations on the implicit reasoning that the administration's assessment must be correct by virtue of having been made, effectively foreclosing substantive judicial review. Stakeholders characterised the situation as one in which judicial oversight of security restriction codes had been non-functional for approximately two years as of 2025.[146]

In 2025, stakeholder accounts pointed to an emerging pattern of indefinite administrative detention facilitated through the repeated application of security restriction codes. One case documented by a stakeholder involved an Iranian national facing a death sentence in Iran, who had applied for international protection in Türkiye on this basis. The same Iranian court judgment cited as grounds for his international protection application was subsequently used to assign him a security restriction code. When documentation was absent, claims were dismissed as unsubstantiated; when documentation was presented, it was reframed as evidence of a threat to public order. Despite winning a court case annulling the rejection of his international protection application, the individual remained in administrative detention. At the time of reporting, he had been held for 32 months across removal centres in Istanbul, Aydın, Antalya, and Ankara, with eight active administrative cases running concurrently. Stakeholders described a cycle in which each successful court ruling was immediately followed by the administration reassigning a new restriction code, invoking its discretionary authority, and issuing a fresh deportation order and detention decision.[147] With over 300 additional codes reportedly available to be applied and more than 30 removal

143 Information provided by multiple stakeholders, February and March 2026.
144 Information provided by a stakeholder, April 2026.
145 Information provided by a stakeholder, March 2026.
146 Information provided by multiple stakeholders March and April 2026.
147 İdame Medya, BORALTAN KÖPRÜSÜ | Türkiye'de Mülteci Olmak, 28 August 2025, available here.

centres in operation, practitioners characterised the situation as one of potentially indefinite detention, ending only with the individual's death in custody. More broadly, stakeholders observed that as of 2025, judicial review of security restriction codes had been effectively non-functional for two years in practice, with courts, particularly the 1st and 26th Administrative Courts of Ankara, routinely deferring to the administration on the grounds that the designation must be correct if the state has issued it.[148] It is reported that foreign intelligence reports are accepted by Turkish officials without adequate filtering or scrutiny when issuing security codes.[149]

The situation of Uyghurs in Türkiye illustrates the compounding risks created by the security code regime. A November 2025 Human Rights Watch report documented how Turkish authorities had increasingly assigned G-87 codes to Uyghurs, often without reasonable justification or concrete evidence of wrongdoing, triggering deportation proceedings against a community that faces a well-founded risk of persecution if returned to China. The report found that courts reviewing deportation orders against Uyghurs had upheld them without specifying what conduct constituted the alleged threat, and had ruled that the prohibition of refoulement did not apply, despite Türkiye's obligations under international and domestic law.[150]

Operational Enforcement of Migration Control

In previous years, the authorities conducted 'peace practices' and what were commonly referred to as sweeping operations targeting irregular migration, particularly in major cities.[151] 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 targeted a specific neighbourhood in a city. In September 2024, it was announced that during four days of operations 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 smugglers was apprehended and 25 of them were arrested. During the same group of operations, 1,029 irregular migrants were apprehended.[152] 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.[153] From 1 June 2023 to 11 April 2025, approximately 260,000 migrants without a regular status were deported.[154]

In 2025, operations continued at an intensified pace and expanded geographic scope. A notable shift in official discourse also emerged: whereas earlier operations were framed primarily around irregular migration control, announcements in 2025 consistently paired irregular migration enforcement with migrant smuggling, presenting the two as inseparable priorities. In June 2025, operations conducted across 51 provinces over a two-week period resulted in the apprehension of 273 smuggling organisers, 98 of whom

148 Information provided by multiple stakeholders, February 2026.
149 İdame Medya, BORALTAN KÖPRÜSÜ | Türkiye'de Mülteci Olmak, 28 August 2025, available here.
150 HRW, Protected No More Uyghurs in Türkiye, 12 November 2025, available here.
151 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.
152 T. C. İçişleri Bakanlığı, Göç İdaresi Başkanlığı, “Kalkan-27” Operasyonlarında 84 Göçmen Kaçakçısı, 1029 Düzensiz Göçmen Yakalandı, 25.09.2024, available here
153 AA, İçişleri Bakanı Ali Yerlikaya, AA Editör Masası’nda Soruları Yanıtladı, 25.12.2024, available here
154 T.C. Göç İdaresi Başkanlığı İçişleri Bakanı Ali Yerlikaya: “Türkiye, Göç Yönetiminde Dünyaya Model Ülke”,16.04.2025, available here.

were formally arrested, alongside 1,022 irregular migrants.[155] By September 2025, a single nationwide operation spanning all 81 provinces involved over 28,000 personnel, identity checks on more than 402,000 individuals, and the detention of 52 smuggling organisers and 666 irregular migrants.[156] A similar large-scale operation in December 2025, again covering all 81 provinces, saw 55 smuggling organisers and 972 irregular migrants apprehended following identity checks on over 431,000 people.[157] In 2025, 113,261 individuals were deported.[158]

Mobile migration points[159] carry out identity checks of foreigners they suspect are 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 taken to mobile migration points where the PMM staff can query data with fingerprints. Accordingly, these mobile units are equipped with a 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 minibus.[160] When foreigners who do not have a legal right to stay in Türkiye are identified, they are sent to the removal centres and the administrative detention and deportation process is initiated. There are 270 mobile migration points total, present in 81 provincesAuthorities 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.[161] In practice, according to observation of some stakeholders, there are some unofficial quotas for each police to detaincertain numbers of migrants and refer to PDMM.[162] Some stakeholders also emphasised that the increasing number of mobile migration points has 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 crossing points without being processed in a removal centre. 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.[163]

In June 2025, Interior Minister Ali Yerlikaya announced a ceremony marking the commissioning of 105 additional vehicles, bringing the total fleet from 270 to 375 units operating across all 81 provinces.[164] By December 2025, all 375 vehicles remained operational nationwide,[165] and as of March 2026, the fleet was supported by 2,254 dedicated personnel.[166] Minister Yerlikaya has consistently framed the program as an unparalleled model in global migration governance. However, the media visibility of the Mobile Migration Points appears to have quietly diminished compared to earlier years, with official communications now largely confined to high-visibility moments such as religious holidays.[167] Stakeholders have suggested that

155 T.C. İçişleri Bakanlığı, Bakanımız Sayın Ali Yerlikaya: "51 İlde Düzensiz Göçe Yönelik Düzenlenen Operasyonlarda 273 Göçmen Kaçakçılığı Organizatörü Yakalandı", 11 June 2025, available here.

156 PMM, İçişleri Bakanı Ali Yerlikaya: “81 İlde Göçmen Kaçakçılarına Yönelik Operasyon”, 11 September 2025, available here.

157 T.C. İçişleri Bakanlığı, 81 İlde Göçmen Kaçakçılığı Organizatörleri ve Düzensiz Göçe Yönelik Denetimler Düzenlendi, 16 December 2025, available here.

158 PMM, *Faaliyet Raporu 2025*, available here.

159 Haber Turk, Göç İdaresi Başkanı Toros: 1 Haziran'dan bu yana 45 bin 454 göçmen sınır dışı edildi, 5 October 2023, available here.

160 AA, Ibid here.

161 AA, Ibid.

162 Information provided by stakeholders, March – April 2024.

163 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.

164 T.C. İçişleri Bakanlığı, 105 Mobil Göç Aracı Hizmete Alım Törenimizi Gerçekleştirdik, 17 July 2025, available here.

165 PMM, Dünyaya Örnek Bir Model: Mobil Göç Noktası Araçları, 14 December 2025, available here.

166 PMM, 81 İlimizde 375 Mobil Göç Noktası Aracımız ve 2.254 Personelimiz İle Görev Başındayız, 25 March 2026, available here.

167 AA, Bayramda 81 ilde 375 mobil göç noktası aracıyla denetimler sürdürülecek, 20 March 2026, available here.

by 2026 the program had effectively completed its primary mission, people who have problems with their IDs had largely been pushed out of visibility. Yet the consequences of sustained enforcement pressure extend beyond detection statistics: many individuals have withdrawn from public life entirely, with some reported to have been unable to leave their homes for months, their access to services and movement severely curtailed.[168]

Deportation statistics and systemic outcomes

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 stated that Türkiye had conducted more deportations than all EU countries combined during this period. According to the PMM's performance programme, 142,536 individuals were deported in 2024. The target for 2025 was set at 150,000, though the end-of-year estimate stands at 100,000. Looking ahead, PMM has set a deportation target of 110,000 for 2026, rising to 120,000 for each of 2027 and 2028.[169]

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.[170] Detained migrants also frequently criticised the conditions in detention centres.[171] As highlighted in a report,[172] 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 right to an effective remedy expires, in practice this rule is not always applied, and the risk of deportation remains[173].According to stakeholders, this trend continued into 2025. Stakeholders reported that, following the change of regime in Syria, Syrian nationals apprehended by authorities increasingly opted for voluntary return rather than awaiting release, even in cases where detention at removal centres was expected to last only three to four days, citing the conditions of those facilities as a decisive factor.[174]

2.2 Appeal before the Administrative Court

The appeal against a deportation decision is a remedy separate from remedies in the international protection procedure.[175] Although suspended between 2016 and 2019, it has an automatic suspensive effect since December 2019.[176] 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.[177] With an amendment introduced in November 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 defence. If official notification cannot be delivered to the applicant's address, the timeframe for deeming the case as not filed was reduced from one year to two months. It is at

168 Information provided by multiple stakeholders, March 2026.
169 PMM, *2026 Performans Programı*, available here.
170 Information provided by multiple stakeholders, May 2023 & Information provided by stakeholders, March - April 2024.
171 Asya Robins, 'Sınır dışı kararı verilen İranlı mülteciler geri gönderme merkezindeki koşulları anlattı: 'Şiddet normal bir şey'', *BBC News,* 16 February 2022, available here.
172 Global Detention Project, Türkiye: Submission to the Committee against Torture, June 2024.
173 Bianet, 21.09.2023, "Bir Geri Gönderme Merkezine günde 6 bin kişi götürülüyor" available here.
174 Information provided by multiple stakeholders, March and April 2026.
175 Article 53 LFIP.
176 Law No 7196 amending several acts, 6 December 2019, available in Turkish here.
177 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.

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 finalised within 15 days.[178] Stakeholders note that the November 2024 amendment has markedly expedited administrative court proceedings in deportation cases, with case durations falling from roughly one year in 2024 to two to four months in 2025. At the same time, the administration has been observed to submit generic rather than individualised defence submissions, while courts have shown little inclination to hold oral hearings. Stakeholders indicate that both actors now prioritise procedural speed over thorough fact-finding. This trend is reflected in caseload figures from Istanbul, where the 1st, 15th, 16th, 17th, and 18th Administrative Courts handle disputes arising exclusively under the LFIP, predominantly deportation order challenges. Average pending cases across these courts fell from approximately 12,000 at end-2024 to around 5,000 by end-2025.[179]

Procedural challenges

Deportation decisions are often poorly communicated to individuals, hindering their ability to notify legal representatives or family members, and 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.[180] In 2025, the practice of frequent transfer of individuals, including unaccompanied minors whose age appeared to be over 18 on PMM's records,[181] from one centre to another centre made it very hard for the lawyers to trace the location and to reach out to the person.[182] Accessing information about detained foreigners is very difficult due to the lack of a centralised system[183] and lawyers reported difficulties in trying to gather all the information and write an appeal in seven days, particularly if the case requires translation work or if there are difficulties accessing a client in detention.[184] This short time limit has a negative effect on both access to justice and the quality of the lawyer-client relationship.

Appeals against deportation and administrative detention decisions lead to different practices in different provinces since there are no higher judicial bodies or higher authority to standardise practices. Lawyers find 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. In practice, the automatic suspensive effect is contingent upon the lawyer formally notifying the relevant administrative body that a case has been filed. As this notification cannot be made through electronic means, it must be carried out in person, presenting a significant practical obstacle in cases where removal centres are located far from urban centres and courthouse facilities. 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.[185] 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.

178 Law no 7533/36 21 November 2024, available in Turkish here.
179 Information provided by multiple stakeholders, March and April 2026.
180 Global Detention Project, *Türkiye: Submission to the Committee against Torture*, June 2024 & Information provide by stakeholders, March – April 2024.
181 Information provided by a stakeholder, June 2023.
182 Information provided by stakeholders, March 2024.
183 Global Detention Project, Türkiye: Submission to the Committee against Torture, 12 June 2024, available here.
184 Information provided by stakeholders, March – April 2024.
185 Information provided by a stakeholder, April 2025.

The 1st Administrative Court of **Izmir** requested the Constitutional Court to conduct a normative review of the seven-day limit in January 2023.[186] The Constitutional Court examined whether the reduction of the appeal period for deportation orders from 15 to 7 days, under Article 53(3) of the LFIP, was constitutionally permissible, finding that it was justified by the need to limit foreigners' freedom of movement and reduce accommodation costs, and that the period was not so short as to prevent preparation of an appeal or access to legal representation. It ruled that the 7-day appeal period did not violate the Constitution, without addressing the mentioned challenges.[187]

Stakeholders note that the seven-day filing deadline has been interpreted more strictly in 2025, with courts no longer examining notifications for procedural defects. Defective notification of deportation orders, including cases where no interpreter was present, is no longer treated as a basis for challenge. In one reported case, a court dismissed proceedings on time-bar grounds without examining a notification defect argument, despite the applicant's illiteracy being on the record.[188]

Intersection of criminal investigations and deportation orders

The mere existence of a criminal investigation can be sufficient for a deportation decision to be issued. An acquittal does not prevent deportations. According to stakeholders, the issuance of deportation orders solely on the basis of criminal investigations significantly increased in 2025. 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 difficulties in securing legal assistance and filing an appeal within the strict seven-day deadline.[189]

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.[190]

In 2025, stakeholders observed divergent judicial approaches to deportation orders issued solely on the basis of unresolved criminal investigations. The 16th Administrative Court annulled a deportation order against an Afghan national facing allegations of threats and insults,[191] and separately annulled an order against a Syrian national subject to proceedings for handling stolen goods;[192] in both cases, the court found the administration had failed to conduct the individual assessment required under Articles 4 and 55 of the LFIP. The Istanbul 15th Administrative Court, by contrast, upheld a deportation order against a Palestinian national facing prosecution for attempted theft, dismissing the challenge on public order grounds despite the absence of a final conviction.[193] While the outcomes appear inconsistent on their face, a closer reading suggests a material procedural distinction: the orders that were annulled did not designate a safe third

186 Information provided by a stakeholder, May 2023.
187 Resmi Gazete, 27.06.2023, available here.
188 Information provided by a stakeholder, April 2026.
189 Information provided by stakeholders in March, April and May 2026.
190 T.C. Eskişehir 1. İdare Mahkemesi, 2024/1594 E., 2025/51 K. 24.01.2025 T.
191 T.C. İstanbul 16. İdare Mahkemesi, 2025/300 E., 2025/3020 K., 30.05.2025 T.
192 T.C. İstanbul 16. İdare Mahkemesi, 2026/438 E., 2026/900 K., 11.03.2026 T.
193 T.C. İstanbul 15. İdare Mahkemesi, 2025/4785 E., 2026/1086 K., 31.03.2026 T.

country, whereas the upheld order specified Germany as the destination, indicating that the divergence in outcomes may owe less to differing assessments of the underlying criminal allegations than to whether the deportation order itself was procedurally complete.

In late 2025, stakeholders observed a new pattern in which approximately 150 families, including Syrian, Egyptian, and Palestinian nationals, were apprehended on the basis of minor criminal records attributed to their children, some dating back five to six years. The offences in question were of a minor nature, including threats, insults, and traffic incidents involving motorcycles. Stakeholders acknowledged that the authorities appeared to be motivated by concerns over children's involvement in organised gangs; however, the practice constituted a manifest violation of the presumption of innocence and the principle of individual criminal responsibility, and represented yet another instance in which criminal proceedings were conflated with immigration enforcement in a manner that effectively stretched the boundaries of the non-refoulement principle.[194]

A documentary on the migration situation featured a speaker summarising the underlying message conveyed by the system as follows: even as a victim, a refugee should avoid appearing before the prosecutor, since doing so ultimately risks resulting in their deportation.[195]

Examples of recent case law

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 publish decisions.[196] Stakeholders noted that the growing volume of LFIP disputes before administrative courts has been accompanied by increasing fragmentation in judicial practice, rather than greater consistency. Several stakeholders observed that even courts with a previously settled jurisprudence in this area have begun issuing decisions of a standard no higher than those of courts with little prior exposure to LFIP matters.[197] 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 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 emphasised 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.[198]

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 most cases, especially for those who previously applied for international protection, obtaining this decision does not significantly change the individual's situation[199] (see: Subsequent applications).

'Voluntary' returns and Derogation of Automatic Suspensive Effect

194 Information provided by multiple stakeholders, April 2026.
195 İdame Medya, *BORALTAN KÖPRÜSÜ | Türkiye'de Mülteci Olmak*, 28 August 2025, available here.
196 Mülteci-Der, Karar Bankası available here; Mülteci Hakları Merkezi, Karar Bankası here.
197 Information provided by multiple stakeholders March and April 2026.
198 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.
199 Information provided by stakeholders, February and March 2025.

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.200 PMM created its own assisted voluntary return mechanism; however, such mechanism lacks transparency, and the number of returnees is unclear.

According to a June 2024 report by the Union of Turkish Bar Associations, migrants are systematically deported despite pending appeals or active lawsuits filed under Article 53/3 of the LFIP.[201]

For non-Syrians, problems regarding voluntary returns and the process remained the same in 2025 (See: Material conditions in Detention) Stakeholders reported continued use of coercive practices to obtain voluntary return signatures from individuals held in removal centres in 2025, with the following cases notably involving non-Syrian nationals. An Afghan national detained at Binkılıç RC was deported to Afghanistan in November 2025 notwithstanding an active court challenge, with the voluntary return form on file bearing only an unrecognisable mark rather than a signature consistent with the applicant's known examples.[202] In a separate case, a postgraduate student at Istanbul University, an Azerbaijan national was detained in August 2025 following participation in a protest against cafeteria price increases and held at Arnavutköy RC, where her lawyer alleged that officers proposed she act as an informant, subjected her to eleven hours of enforced sitting upon her refusal, and pressured her to sign a voluntary return form before her appeal proceedings had concluded.[203]

In March 2025, a lawyer reported via social media that two Uyghur individuals had been issued deportation orders to China despite a risk of persecution, sharing excerpts from an administrative court decision rejecting their appeal against those orders.[204] On the same day, PMM issued a statement dismissing media reports of the deportations as false, affirming that the non-refoulement principle under Article 4 of Law No. 6458 is rigorously observed and that no Uyghur individual has ever been deported to China. PMM further stated that one of the individuals had voluntarily travelled to a Western country where his family resides, while the detention order concerning the other had been lifted in 2023.[205] However, PMM's statement did not address whether deportation orders had in fact been issued against either individual, nor whether appeals against such orders had been rejected by the competent administrative court.

In May 2025, another lawyer reported via social media that an Uzbek national had been deported despite a cancellation of the deportation order by Istanbul 15th Administrative Court. According to the lawyer, the individual was detained in a raid on his home, transferred to an undisclosed location without notifying his family or legal representatives, and without being permitted to access medication or personal belongings.[206] PMM issued a statement asserting that a deportation order had been lawfully issued on grounds of public order and security, that the individual had challenged the decision before an administrative court, and that the court had found no unlawfulness and dismissed the case, following which the deportation was carried out. PMM also announced that legal proceedings had been initiated against those publicly disseminating

200 Mülteci-Der, *Joint Assessment: Proposed Amendments in the Law on Foreigners and International Protection of Türkiye*, 4 December 2019, available here.
201 TBB, Hukuka Aykırı Gerçekleştirilen Sınır Dışı İşlemlerine İlişkin Rapor, Haziran 2024 here.
202 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler*, 20 June 2026, available here.
203 Medyascope, *Üniversite öğrencisi Nana, hayati tehlikesi bulunduğu Azerbaycan'a geri gönderilmeye çalışılıyor*, 25 August 2025, available here.
204 X (formerly twitter), 15 March 2025, available here.
205 PMM, *Uygur Türkü İki Şahısla İlgili Gerçek Dışı İddialar Hakkında Basın Açıklaması*, 15 March 2025, available here.
206 X (formerly twitter), 15.05.2025, available here.

misleading information.[207] However, the statement did not address the court document shared by the lawyer indicating that the deportation order had been judicially cancelled.

In August 2025, a woman from Afghanistan was apprehended together with her brother and sister-in-law on account of their irregular status and subsequently held in a removal centre. According to her account, upon learning that she had been in a relationship outside of marriage, her brother explicitly threatened to kill her, stating that while doing so in Türkiye would be difficult, he intended to carry it out upon return to Afghanistan. The brother thereafter submitted a voluntary return request to the RC authorities on behalf of both his sister and his wife. Despite the woman being an adult, the request was processed without her consent and executed within a week. Her notifications to the RC authorities that she had contacted the relevant bar association and the UNHCR office were not taken into account.[208]

With regard to Syrian nationals, stakeholders observed a notable decline in coercive practices aimed at obtaining voluntary return signatures in 2025. However, other forms of pressure encouraging return to Syria were reported during the same period (for more details, see Temporary Protection Procedure).[209]

2.3 The complaint procedure before the Constitutional Court

An individual complaints procedure is available before the Constitutional Court. It 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 before 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.[210]

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 before 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.[211] In practice, since December 2019 when automatic suspensive effect was reinstated for appeals against deportation decisons, lawyers no longer directly apply to the Constitutional Court when an administrative entity unlawfully deports their client but to the relevant administrative court.

On 2 October 2025, the Constitutional Court ruled on an application concerning a Syrian national who had been subject to a deportation order issued under Article 54(1)(b), (d), and (k) of the LFIP on grounds of alleged links to terrorist organisations. The deportation order acknowledged, pursuant to Articles 4 and 55(1)(a), that removal to Syria was impermissible, and provided instead for deportation to a safe third country, without, however, identifying which country that would be. The İzmir 1st Administrative Court had dismissed the applicant's challenge without examining this indeterminacy or assessing whether the applicant would face a risk of ill-treatment in the unspecified destination country or be indirectly returned to Syria. Accordingly, the Court found a violation of the right to life and prohibition of ill-treatment, ordered retrial before the İzmir 1st Administrative Court, and ruled that the applicant must not be deported until those proceedings are concluded.[212]

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207 PMM, *Özbekistan Uyruklu Yabancının Sınır Dışı Edilmesiyle İlgili Gerçek Dışı İddialar Hakkında Basın Açıklaması*, 15 May 2025, available here.
208 Information provided by a stakeholder, October 2025.
209 Information provided by multiple stakeholders, February, March and April 2026.
210 Articles 45-51 Law No 6216 on the Formation and Procedures of the Constitutional Court.
211 Law No 7196 amending several acts, 6 December 2019, in Turkish here.
212 T.C. Anayasa Mahkemesi, C.M. Başvurusu, Başvuru No: 2022/7007; T: 02.10.2025.

Following the Constitutional Court's ruling, the İzmir 1st Administrative Court conducted a retrial and, on 18 December 2025, unanimously annulled the deportation order. The court found that upon receiving notification of the applicant's detention on terrorism-related charges, the İzmir Provincial Directorate of Migration Management had issued a deportation order under Article 54(1)(b), (d), and (k) of the LFIP without determining a specific safe third country to which the applicant — whose removal to Syria had been acknowledged as impermissible — would be sent, and without this determination having been made at any subsequent stage either. The court held that, in the absence of a identified destination country, it was impossible to assess whether that country met the safety requirements under Articles 4 and 55 of the LFIP, effectively placing the deportation order beyond judicial scrutiny on the ground of its subject-matter — a defect rendering it unlawful.[213]

In another decision issued on 2 July 2025, the Constitutional Court found a violation of the right to life and the prohibition of ill-treatment under Article 17 of the Constitution in a case concerning the deportation order issued against a Syrian national. The applicant, who had been referred to the Provincial Directorate of Migration Management following criminal proceedings, was issued a deportation order on grounds of posing a threat to public order under Article 54(1)(d) of the Law on Foreigners and International Protection. The order acknowledged, pursuant to Article 55(1)(a), that deportation to the country of origin was impermissible, and provided instead that the applicant would be deported to a safe third country or, only if voluntary, to Syria. The applicant challenged the deportation order before the administrative court, arguing that return to Syria would endanger his life given the armed conflict in which he had lost several family members. The administrative court rejected the case, finding no procedural irregularity in the deportation decision and noting that no direct deportation to Syria had been ordered. The Court accordingly found violations of both the right to life and the prohibition of ill-treatment, and remitted the case to the Balıkesir 1st Administrative Court for retrial.[214]

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.[215] This judgment remains the leading authority on expulsions carried out under the guise of voluntary return.

In 2025, the European Court of Human Rights delivered three judgments against Türkiye concerning the rights of foreign nationals subject to deportation or extradition proceedings. In *Kunshugarov v. Türkiye*, the Court found violations of Article 3 both on account of the applicant's extradition to Kazakhstan, where he faced a real risk of ill-treatment, and on account of the inhuman conditions of his detention at the Kumkapı Removal Centre, while finding no violation of Article 13 in conjunction with Article 2.[216] In *N.R. v. Türkiye*, concerning a Tajik national facing deportation on public order grounds, the Court found a violation of Article 13 in conjunction with Article 3, holding that the absence of automatic suspensive effect in appeals against deportation orders issued under section 54(1)(d) of Law No. 6458, prior to the legislative amendment of December 2019, had deprived the applicant of an effective remedy against his threatened removal to Tajikistan.[217] In *M.A. v. Türkiye*, the Court found violations of Article 3 and Article 13 on account of the conditions of detention at the Gaziantep Removal Centre, as well as violations of Article 5 §§ 2 and 4, finding that the applicant had not been duly informed of the reasons for his administrative detention and had been unable to obtain a speedy and effective judicial review of its lawfulness.[218]

213 T.C. İzmir 1. İdare Mahkemesi, 2025/1968 E., 2025/2593 K., 18.12.2025 T.
214 T.C. Anayasa Mahkemesi, Eymen Al Muhammed Başvurusu, Başvuru No: 2022/7982, 02 July 2025.
215 ECtHR, *Akkad v. Turkey*, [Turkish Translation] by İstanbul Bar Association, available here.
216 ECHR, KUNSHUGAROV v. TÜRKİYE (Application nos. 60811/15 and 54512/17), 14 January 2025, available here.
217 ECHR, N.R. v. TÜRKİYE (Application no. 5137/19), 23 October 2025, available here.
218 ECHR, CASE OF M.A. v. TÜRKİYE (Application no. 36916/19), 27 November 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?
     - o 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.[219]

3.1 Applications on the territory

Relevant authority, mandatory application in person and time limits

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.[220] 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.[221] Where a person wishes to file an application on behalf of adult family members, they must have the latter's written approval.

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.[222] 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.[223] 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

219 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.
220 Article 65(1) LFIP.
221 Article 65(3) LFIP.
222 Article 65(1) RFIP.
223 Article 65(2) RFIP.

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.[224]

The LFIP states that applications for international protection shall be registered by the PDMM.[225] Applicants can request and shall be provided interpretation services for the purpose of the registration interview and later the personal interview.[226]

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 3 to 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. UNHCR has been supporting the registration of persons in need of international protection by working with PMM and its PDMMs.[227]

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.[228] The RFIP provides that application authorities shall notify the applicant of a date for their registration interview during the application if possible, otherwise at a later stage.[229] 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 taken, whereas the latter may be prevented from submitting an application altogether.[230]

Access in practice

In practice, the takeover of the process by PMM in September 2018 resulted in obstacles to access to the asylum procedure. Issues persisted in 2025 and arbitrariness increased after the takeover of registration of non-Syrians. It is difficult to assess the overall system since there is no standardised implementation.[231] Accessing the application process remained difficult in 2025.[232] As the registration system had been nearly blocked for roughly two years, by 2025 applicants had come to accept that certain profiles, particularly single Afghan, Iranian, or Iraqi men, faced near-insurmountable barriers to registration. Vulnerable groups, especially single mothers and single women, were nonetheless able to register in some cases, typically through NGO referrals or the persistent advocacy of a private lawyer. Nationalities less familiar to PDMM authorities appeared to fare comparatively better than those more commonly encountered, Sri Lankan nationals, for instance, over Afghan nationals. In the rare cases where a single man did succeed in registering, his only viable pathway was referral to the Nizip TAC in Gaziantep.

In August 2025, an Afghan national had been repeatedly threatened by the Taliban due to her work in women's rights advocacy in Afghanistan. Following the Taliban's return to power, the threats intensified to

224 Article 65(1) RFIP.
225 Article 69(1) LFIP.
226 Article 70(2) LFIP.
227 UNHCR, *UNHCR's Support to Protection Desks For Refugees and Asylum Seekers in Türkiye*, April 2026, available here; Information provided by multiple stakeholders, April 2026.
228 Article 70(4) RFIP.
229 Article 66(2) RFIP.
230 Information provided by a stakeholder, May 2025
231 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 2026.
232 Information provided by stakeholders, March- April 2026.

the point that she fled to Türkiye with her family. She initially resided under a short-term residence permit before deciding to apply for international protection. At her registration appointment, she disclosed not only the persecution she had faced in Afghanistan but also the domestic violence she was experiencing in Türkiye. She reported that her husband was subjecting her to physical abuse and, after being registered as an international protection applicant, proceeded to the police station to file a complaint, following the Directorate's guidance. Rather than receiving protection, however, she was transferred to the Çatalca RC. Following her eventual release, her applicant identity document and other personal papers were not returned to her despite her repeated requests.[233] In another case, in July 2025, a single Congolese man who attempted to apply for international protection in Bolu was explicitly informed that upon registration he would be referred to the Nizip TAC to complete the registration process.[234] In January 2026, an individual seeking to lodge an international protection application was informed that applications could not be accepted in Adana, and that the competent office for registration was located in Gaziantep, with Nizip TAC designated for this purpose. The individual was unable to submit the application in person, and an attempt by his lawyer to file on their behalf was equally rejected. Authorities indicated that the applicant could be accommodated in a camp, with a response promised within two to three weeks of the application date; however, no written documentation was provided at that stage. Following persistent requests, a referral document to Nizip was eventually issued. Upon arrival at Nizip 2 TAC, the individual was held within the facility and, upon request, issued a document permitting daily exit between 07:00 and 16:00 for essential needs. The applicant and his legal representative raised concerns regarding the applicant's advanced age, which exceeded 60, and chronic health condition. TAC officials reportedly questioned the appropriateness of the referral given the applicant's profile. The applicant remained at the facility for several weeks pending a response from the Presidency of Migration Management (PMM), after which he was released.[235]

In 2025, a young Iranian national seeking to lodge an international protection application at the Istanbul PDMM, and holding documentary evidence of both the risk of persecution in Iran and ill-treatment he had personally suffered in Iranian detention, was refused registration and directed to apply in another province without an official referral. He was subsequently apprehended due to his irregular status and held across several removal centres for approximately five months, before being released following an interim measure issued by the Constitutional Court suspending his deportation proceedings.[236]

Registration interview and process

The registration interview serves to compile information and any documents from the applicant to establish identity, flight reasons, 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.[237] 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.[238] 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.[239]

233 Information provided by a stakeholder, October 2025.
234 Information provided by a stakeholder, November 2025.
235 Information provided by a stakeholder, January 2026.
236 Information provided by a stakeholder, August 2026.
237 Article 69(2)-(4) LFIP.
238 Article 69(2) LFIP; Article 69(4) RFIP.
239 Article 69(3) LFIP; Article 69(3) RFIP.

Where there are concerns that an applicant may have a medical condition threatening public health, they may be referred to a medical check.[240] Information on any special needs shall also be recorded.[241] In practice, emphasizing health conditions during registration risks creating the impression that the applicant's primary reason for travel was medical rather than protection-related. That said, among those already deemed eligible for registration, documented evidence of a critical health condition, such as advanced pregnancy, disability, or chronic illness, has been taken into account by PDMM offices in prioritising their cases.[242]

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 they are able to express themself. The statement shall contain specific elements including the reasons for entering Türkiye, as well as any special needs of the applicant.[243] Illiterate applicants are exempt from this requirement. Furthermore, the PDMM shall also obtain any supporting documents that the applicant may have with them 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 in the electronic system must be precisely read back to the applicant who will have the opportunity to make corrections.[244] A printed version of the registration form filled in electronically is also handed to the applicant.[245]

Documents issued following registration

The law states that the applicant will receive an International Protection Applicant Identification Card upon completion of registration.[246] The Ministry carries out the renewal and extension of international protection applicant identification cards.[247] 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,[248] and the obligation to renew identification cards every six months was abolished.[249]

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 there. 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 3 to 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 as they have established a routine or entered into rental agreements,

240 Article 69(6) LFIP.
241 Article 70(5) RFIP.
242 Information provided by a stakeholder, March 2026.
243 Article 65(5) RFIP.
244 Article 70(6) RFIP.
245 Article 70(7) RFIP.
246 Article 76(1) LFIP, as amended by Article 35 Law No 7148 of 18 October 2018.
247 Article 76(1) LFIP, as amended by Article 81 Law No 7196 of 24 December 2019.
248 Article 76(2) LFIP.
249 Article 76(1) LFIP, as amended by Article 81 Law No 7196 of 24 December 2019.

among other factors. According to stakeholders, the international protection applicant identification card issued at the appointed province's PDMM may remain valid for one year or even longer in some cases.[250]

However, if the applicant is denied the opportunity to submit their application at a certain PDMM and is told to approach another PDMM that "takes" international protection applicants, then they are 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 Centre[251] (see Detention of Asylum Seekers). In 2025, persons not deemed vulnerable, most commonly single men, were directly referred to the Nizip TAC to complete their registration process under conditions of de facto detention.[252]

Province of residence and the deconcentration policy

On 30 June 2022, PMM announced that 1,169 districts would be closed to protection seekers registrations as of 1 July 2022 except for newborn registration and family reunifications. In early 2022, the previously unconfirmed 'satellite city' policy was publicly confirmed with the announcement of the 'deconcentration policy.'[253] Neighbourhoods with a 25% refugee density have been completely closed to new registrations, 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 disticts are disclosed to foreign nationals seeking address registrations for temporary protection, international protection, and residence permits, as well as those seeking to change 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, non-Turkish nationals are not 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, Adiyaman, 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).[254] 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.[255] According to the YİMER call center, the closed neighbourhood policy does not apply to foreigners of Turkish descent. In 2025, the deconcentration policy continued with this list of provinces and neighbourhoods.[256]

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.

250 Information provided by a stakeholder, May 2025.
251 Information provided by stakeholders, March – April 2024 and May 2025.
252 Information provided by multiple stakeholders, November 2025, February and March 2026.
253 Ikamet, Türkiye Closes 781 Neighborhoods to Foreigners, Addresses, May 2022, available in English here
254 PMM, 'Mahalle Kapatma Duyurusu hk.', 30 June 2022, available in Turkish at: https://bit.ly/44zWSQk.
255 PMM, "İstanbul'da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı" İddialarına İlişkin Basın Açıklaması, 16 July 2023, available here
256 Information provided by multiple stakeholders, April 2026.

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, 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.

Access to registration by province in practice and referrals to other provinces of residence

In 2025, procedures varied from one city to another.[257] While the PDMM accepts applications, it refers them to province of residences, considering factors such as the residence of family members. In Istanbul,[258] 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 stakeholder accounts, by 2025 it had become effectively impossible for applicants without lawyer or NGO accompaniment to obtain a referral or appointment for the purposes of lodging an international protection application.[259] Almost all PDMMs[260] require a rental contract for registration, yet undocumented individuals face fines for renting, creating an impossible situation for applicants.

Applicants referred to Nizip TAC are expected to cover their own travel expenses, which may present a significant financial barrier. By way of illustration, a bus ticket from Istanbul to Şanlıurfa costs approximately TRY 2,000 (EUR 40).[261]). Stakeholders further note that applicants who completed registration without being placed in Nizip TAC were referred to satellite cities including Karaman, Bursa, Sinop, and Mersin.[262]

Individuals discharged from Nizip TAC fall into three categories: those with pending applications, those with rejected applications, and those whose applications were granted and who were assigned to other provinces. A common challenge across all three groups is the absence of access to employment and financial assistance, which has left many unable to sustain themselves during the period following discharge. In a number of cases, individuals lacked the financial means even to travel to the province to which they had been referred.[263]

In Van, registration is reported to be largely inaccessible. In August 2025, an applicant from an African country who applied to Konya PDMM was asked to wait six months without being issued a referral letter or any application document, and was only invited to proceed at the beginning of 2026. Some applicants in Kayseri have been able to access registration with the support of local organisations such as the Afghan Refugees Solidarity Association (ARSA

257 Information provided by stakeholders, March, April and May 2026.
258 Information provided by stakeholders, March – April 2025.
259 Information provided by multiple stakeholders March and April 2026.
260 Information provided by stakeholders, March – April 2026.
261 Information provided by multiple stakeholders, April 2026.
262 Information provided by multiple stakeholders, April 2026.
263 Information provided by multiple stakeholders, April 2026.

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 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. Since accessing registration remains highly difficult for those holding T6 documents, release from a removal centre with a T6 document continued in 2025 to function as a de facto alternative status for individuals who cannot return to their countries of origin. Given that they have already been released, the likelihood of re-apprehension is low, meaning that they can at least remain in the country, even in the absence of access to basic rights.[264]

In 2025, 6,430 individuals applied for international protection,[265] a continuous decrease since 2022,potentially due to the above-mentioned difficulties, and deepened economic crisis. Based on this specific statistic, stakeholders emphasised that the figures are difficult to interpret, as the need for registration persists.[266]

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.[267] The expected outcomes are to strengthen and maintain the effectiveness of the 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.[268]

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 border,[269] the PDMM shall be notified 'at once' and shall process the application.[270] Applications for international protection by persons in detention shall also be notified to the PDMM 'at once'.[271]

Persons whose international protection application is 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).[272] Due to the decreasing number of registrations and the increasing number of

264 Information provided by a stakeholder, March 2026.
265 PMM, *Statistics*, 2025, available here.
266 Information provided by a stakeholder, April 2025.
267 PMM, 1 April 2022, 'Ulusal İltica Prosedürlerinin Etkinliğinin Kuvvetlendirilmesine İlişkin Projenin Açılış Toplantısı Gerçekleştirildi', available in Turkish here & UNHRC, 31 March 2022, *Press Release: Reinforce Effectiveness of National Asylum Procedures in Compliance with International Standards and National Legislation*.
268 Ministry of Foreign Affairs, 'Ulusal Sığınma Prosedürlerinin Etkinliğinin Uluslararası Standartlar ve Ulusal Mevzuata Uygun Olarak Kuvvetlendirilmesi ', 14 October 2022, available in Turkish here.
269 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.
270 Article 65(2) LFIP.
271 Article 65(5) LFIP.
272 Information provided by a stakeholder, February 2019.

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.[273]

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.[274] 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.[275] Under Article 65(1) of the Law on Foreigners and International Protection (LFIP), international protection applications must be made by the applicant in person. In practice, lawyers have sought to accompany their clients during the lodging of applications at removal centres not to submit the application on the client's behalf, but to ensure that the administration has duly received it, including by obtaining a document confirming receipt. However, lawyers reported facing significant obstacles in this regard: not only were they at times not permitted to be present, but the administration was also reluctant to formally receive applications or to issue any document confirming receipt.[276]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 refuse to register the application while presenting this refusal as in the applicant's best interest. In some cases where the application is accepted while the person is in the Removal Center, applicants are later released without receiving any information regarding the status or outcome of their international protection claim.[277] In 2025, one stakeholder reported that, following considerable effort to have their client's application registered at Tuzla RC, the director of the removal centre personally pressured the applicant to withdraw it. The director summoned the applicant without the lawyer present and made a series of targeted arguments tailored to the individual's profile: that their country of origin would designate them a terrorist if they pursued the claim; that their lawyer was uninformed and had undermined the trust relationship with the consulate; and that the application would be rejected in any event. For applicants with a well-founded fear of persecution, the director further argued that they would be unable to leave the centre, that the authorities were aware of their undeclared work, and that their lawyer had failed to advise them adequately. When the lawyer subsequently submitted a written petition seeking only to confirm that their client had personally lodged the application, the removal centre responded that lawyers cannot submit international protection applications on behalf of their clients and that applicants may always do so themselves. This left the lawyer unable to verify the status of the application through any effective channel, creating a procedural impasse with no available remedy.[278] One stakeholder reported that in Inceğiz RC, officials verbally informed applicants subject to deportation orders issued under Article 54(1)(d) LFIP (on grounds of threat to public order, public security, or public health) that their international protection applications would not be received.

273 Information provided by a stakeholder, May 2025.
274 Information provided by multiple stakeholders, May 2023.
275 Information provided by multiple stakeholders, March – April 2024.
276 Information provided by multiple stakeholders February and March 2026.
277 Information provided by a stakeholder May 2025.
278 Information provided by a stakeholder February 2026.

According to a stakeholder, in 2025, a status determination interview was conducted inside a Removal Center in Istanbul. Reportedly, the officials responsible for conducting the interview were connected to the RC remotely via an online platform.[279]

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. The PMM established a specific code, "V89" entitled "Greece – return", but stakeholders have not referred to this being used in practice. Readmission operations stopped as of 16 March 2020 and Türkiye was still not accepting readmissions as of the end of 2023[280] (See the AIDA Country Report: Greece 2023). As of June 2025, the number of Syrians readmitted by Türkiye is 412 through th EU-Türkiye agreement.[281] Türkiye's unilateral suspension of the return of irregular migrants from the Greek islands on public health grounds, which began in March 2020, continues as of December 2025.[282] In 2025, unregistered individuals, predominantly non-Syrians who had been pushed back from Greece, were taken into administrative detention, while those already registered as international protection applicants were referred to Nizip TAC.

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?	☐ Yes ☒ No
3. Backlog of pending cases at first instance as of 31 December 2025:	Not available

Applications for international protection shall be examined and decided upon by PMM.[283] "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.[284] 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.

Processing times and decision-making rates have remained largely opaque, with comprehensive data on acceptance rates and procedural timelines unavailable. However, stakeholders observed a notable shift in practice over 2025. Whereas applicants had previously waited between seven and ten years for a decision on their international protection claims, applications that had been pending for several years were examined

279 Information provided by a stakeholder, May 2025.
280 International Rescue Committee, 'What is the EU-Türkiye deal?,' 18 March 2021, available here.
281 Information provided by a stakeholder, June 2023.
282 European Comission, *Türkiye 2024 Report*, 30.10.2024, available here.
283 Article 78 LFIP.
284 Article 78(1) LFIP.

and concluded within the last three to four years, predominantly with negative outcomes. This trend of accelerated negative decisions extended to more recently lodged applications as well, with cases filed in recent years also being concluded at a markedly faster pace.Rejections often result from insufficient information and documentation, failure to meet the burden of proof, or inadequate supporting evidence.[285]

This trend is reflected in the statistics published by the PMM. In 2024, PMM issued 85,125 decisions while the number of new international protection applications stood at 9,009, indicating that the vast majority of decisions concerned previously pending caseload. In 2025, new applications reached a record low of 6,430, the lowest figure recorded since 2010, while the number of decisions issued stood at 63,406, nearly ten times the volume of incoming applications, further evidencing the systematic clearance of the longstanding backlog.[286]

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 high number compared to the rest of the year. These were predominantly rejection decisions. Similarly, in Van, at least 50 rejection decisions were issued between June and July 2025.[287] 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.[288]

Overall, practice on the examination and the decision-making at first instance is not uniform across provinces.[289] 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 capacity.[290] There are too many pending international protection files, authorities are working to quicken the decision process after registration and decrease the waiting time for the decision.[291] To improve the decision processes, trainings are organised for PMM staff, and random file-checking are conducted. Like 2024, one of the priorities of PMM in 2025 is fast and efficient procedures.[292] 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.[293]

Under the 2025–2028 EUAA–PMM Roadmap for Cooperation, capacity development on Country of Origin Information constitutes a dedicated priority area, encompassing training on COI methodology, identity and document verification, and the dissemination of EUAA COI publications in Turkish to inform asylum adjudication at both central and provincial levels.[294]

285 Information shared by stakeholders, March – April 2024, 2025 and 2026.
286 PMM, *Faaliyet Raporu 2024, 2025*, available here.
287 Information provided by a stakeholder, April 2026.
288 Information provided by a stakeholder, May 2025.
289 Information provided by stakeholders, March - April 2024.
290 Ibid.
291 Ibid.
292 PMM, *Faaliyet Raporu 2025*, available here.
293 Information provided by a stakeholder, April 2025.
294 EUAA, *Roadmap for Cooperation between the EUAA and Türkiye (2025-2028)*, June 2025, available here.

UNHCR similarly continued to support the PMM and its provincial directorates through extensive capacity-building activities, including training, workshops, study visits, and on-the-job support, as well as the provision of Country of Origin Information and the drafting of guidance notes and standard operating procedures. These efforts targeted key areas including refugee status determination, temporary protection procedures, child protection, anti-fraud safeguards, and interpreter capacity. A multi-year project concluded in November 2025 aimed at contributing to improvements in the quality and efficiency of international protection status determination, the sustainability of the COI system, and gender mainstreaming in asylum procedures, with a follow-on project initiated to continue supporting Türkiye's temporary protection and international protection frameworks.[295]

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.[296] 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.[297] The number of people with special needs was 67,407 in 2025. The number of interviews conducted with potential trafficking victims was 9,349 the number of victims of human trafficking identified in 2025 is 261.[298]

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,[299] to be conducted by personnel trained in fields such as refugee law, human rights and country of origin information.[300] Applicants are notified of the assigned place and date of their personal interview at the end of their Registration interview.[301] If the interview cannot be held on the assigned date, a new interview date must be issued.[302] The postponed interview date must be no earlier than 10 days after the previous appointment date. Additional interviews may be held with the

295 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.
296 Article 67 LFIP.
297 Information provided by a stakeholder, February 2019 & Information provided by stakeholders, March - April 2024.
298 PMM, *Faaliyet Raporu 2025*, available here.
299 Article 75(1) LFIP.
300 Article 81(2) RFIP.
301 Article 69(5) LFIP.
302 Article 75(4) LFIP.

applicant if deemed necessary.[303] 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.[304]

There are two decision centres located in **İstanbul** and **Ankara**. There are 8 mobile decision teams located in Ankara, Eskisehir, Sakarya, Denizli, Mersin, Samsun, Sivas, and Izmir, including psychologists, and sociologists.[305] PMM identified as one of its aims the increase in the number of interviewing and decision-making staff, as well as interpreters, at provincial directorates, in order to increase the number of interviews and decisions conducted.[306] The mobile teams provide 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.[307]

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.[308] According to civil society and lawyers, however, the quality of interviews remains low in most PDMM.

In 2025, stakeholders observed that applicants held at Nizip TAC were, within the span of a few months, either granted international protection, primarily in the form of conditional refugee status, or issued rejection decisions.

Interviews do not depend on credible country of origin information. Since 2022, some progress was reported regarding interviews with LGBTIQ+ and HIV+ individuals. 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.[309] In 2024, during interviews with LGBTIQ+ refugees, unnecessary and sometimes psychologically abusive questions were asked to determine if individuals were indeed LGBTIQ+.[310] 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.[311] In 2025, stakeholders reported that upon identifying LGBTI+ grounds as the basis of an applicant's claim, interviewers proceeded to ask detailed questions about the applicant's partner, including the partner's whereabouts, and asserted that such relationships are unlawful under Turkish law.[312]

303 Article 75(5) LFIP.
304 Article 82(1) RFIP.
305 Information provided by a stakeholder, March 2024.
306 PMM, *Faaliyet Raporu 2025*, available here.
307 PMM, Faaliyet Raporu; PMM Stratejik Plan 2024-2028.
308 Information provided by various stakeholders, May-June 2023 & March – April 2024.
309 Information provided by a stakeholder, June 2023.
310 KAOS GL, 10 şehirden avukatlar, mülteci LGBTİ+'ların hakları için buluştu, 6.12.2023, available here.
311 Information provided by a stakeholder May 2025.
312 Information provided by a stakeholder, April 2026.

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.[313]

In some cases, each adult member of the family is interviewed individually. However often in practice this is not implemented. If the application is made as a family, interviews are often not conducted separately for adult women and men from the same family.[314] 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 2025. 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 stigmatised for speaking up for themselves, especially in the presence of male family members or officials.[315]

In 2025, all stakeholders reported the biggest obstacle was access to the procedure (see Registration of the asylum application).

1.3.1 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.[316] 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.[317] The interviewer shall inform the interpreter of the scope of the interview and the rules to be complied with.[318]

In 2025, a francophone applicant whose interview was conducted at Nizip TAC was informed that proceeding with a French interpreter would entail a significant waiting period, whereas the interview could be conducted promptly if the applicant agreed to proceed in English. The applicant had accepted despite it is their second language.[319]

1.3.2 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.[320]

313 Information provided by multiple stakeholders April 2025.
314 Information provided by a stakeholder, March - April 2024.
315 Information provided by a stakeholder April 2026.
316 Article 70(2) LFIP.
317 Article 86(2) RFIP.
318 Article 83(3) RFIP.
319 Information provided a stakeholder, April 2026.
320 Article 81(5) RFIP.

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 they want to correct and whether there is any additional information they would like to present.[321]

An interview report shall then be drafted at the end of the interview, and the applicant shall sign it and receive a copy.[322] In practice, applicants are not given a copy of the interview report.[323] Once the application is rejected, the only way to obtain 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? ☒ Yes ☐ No
   - ❖ If yes, is it ☒ Judicial ☒ Administrative
   - ❖ If yes, is it suspensive ☒ Yes ☐ No
2. Average processing time for the appeal body to make a decision: Not available

Decisions must be communicated in writing.[324] 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, they 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.[325] 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.[326] There are some concerns about the lack of verbal or written notification and lack of referral to organisations providing support for the appeal.[327]
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:[328]

- ❖ 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.

321 Article 86(3) RFIP.
322 Article 75(6) LFIP.
323 Information provided by multiple stakeholders, February 2019, March 2021, April 2025.
324 Article 78(6) LFIP.
325 Article 100 LFIP.
326 Information provided by a stakeholder, May 2023 and May 2025.
327 Information provided by a stakeholder, March – April 2024.
328 Article 80 LFIP.

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,[329] subject to the derogation discussed in Removal and *Refoulement*.

In 2025 legal aid offices faced significant challenges in carrying out lawyer assignment processes. In many cases, they refrained from appointing lawyers due to financial constraints. Between January and September 2025, UNHCR counselled and intervened in 3,020 cases involving rejected international protection applications. The proportion of these cases in which applicants were able to access legal aid, whether through project-based mechanisms or provincial legal aid services, remains unknown. [330]

1.4.1 Administrative appeal before IPEC

Negative decisions in the regular procedure may be appealed before the IPEC within 10 days of the written notification of the decision.[331]

IPEC are envisioned as a specialised administrative appeal body and serve under the coordination of the PMM Headquarters.[332] 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.[333] PMM personnel assigned to the IPEC is appointed for a period of 2 years whereas the Ministry of Justice and Ministry of Foreign Affairs representatives are appointed for one-year term. IPEC are envisioned to serve as full-time specialised asylum tribunals as members are not assigned any additional duties.[334]

IPEC are competent to evaluate and decide appeals against the following decisions:[335]

a. Negative status decisions issued in the regular procedure;
b. Other negative decisions on applicants and international protection status holders, not pertaining to international protection status matters as such;
c. 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.

IPEC review the initial PMM decision on both facts and law.[336] 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.

329 Article 80(1)(e) LFIP.
330 UNHCR Türkiye, *Monthly Operational Update, October 2025*, available here.
331 Article 80(1)(a) LFIP.
332 Article 134 RFIP.
333 Article 145 RFIP.
334 Article 146 and 147 RFIP.
335 Article 149 RFIP.
336 Article 100(1) RFIP.

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.[337] 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.[338] In 2025, stakeholders reported that the IPEC issued no positive decisions, with negative decisions being rendered on average within approximately one and a half years.[339]

1.4.2 Judicial appeal at the Administrative Court

Negative decisions in the regular procedure may also be directly appealed before the competent Administrative Courts within 30 days of the written notification of the decision.[340] 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 before the Administrative Court within 30 days of receiving the IPEC decision.

Under Turkish law, administrative court challenges must be filed in the area where the act or decision in question was taken.[341]

While the LFIP did not create specialised asylum and immigration courts, Türkiye's High Council of Judges and Prosecutors determines 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.[342] 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. However, as LFIP-related caseloads grew significantly in subsequent years, additional chambers were designated in high-volume jurisdictions: in Istanbul, the 1st, 15th, 16th, 17th, and 18th Administrative Courts, and in Ankara, the 1st and 26th

337 Article 100(2) RFIP.
338 Information provided by a stakeholder May 2025.
339 Information provided by a stakeholder November 2025.
340 Article 80(1)(ç) LFIP.
341 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.
342 Article 101 LFIP.

Administrative Courts, handle cases falling within the scope of the LFIP in 2025. While the 1st Administrative Court remains the designated chamber in other provinces, these courts in Istanbul and Ankara function in practice as de facto immigration courts. Stakeholders have noted that the distribution of LFIP cases across multiple chambers in Istanbul has had an adverse effect on consistency, with different courts developing divergent approaches to identical legal issues.[343]

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. Under administrative law, the first instance authority remains the administrative court of first instance; however, appeals are lodged before the regional administrative court *(Bölge İdare Mahkemesi)*, where decisions become final. Decisions rendered at this stage are not subject to further appeal before the Council of State *(Danıştay)*.[344]

The evidence threshold set by administrative courts remains 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.[345]Longstanding concerns about the quality of decisions persisted and deepened in 2025.[346]

The rate of positive decisions in cases filed appealing international protection refusals 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. Different decisions are made about two applicants in similar situations.[347] 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.[348] Mülteci-der produced country of origin reports[349] and published the translation of ECtHR judgements into Turkish[350] within the scope of the "Rights in Administrative Detention" project carried out with the financial support of the European Union. In 2025, In collaboration with UNHCR, the UTBA has launched a digital COI platform designed to support lawyers providing legal assistance to international protection applicants and status holders. The platform offers practitioners streamlined access to UNHCR Türkiye's regularly updated COI reports and country profiles compiled from publicly available sources.[351]

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, Izmir** 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. However, according to stakeholders, this trend has not continued. Instead, the experienced administrative courts in these four provinces began

343 Information provided by a stakeholder, March 2026.
344 Article 45 and 46, Law on Administrative Court Procedures (Law No: 2577).
345 Information provided by a stakeholder, April 2023 & information provided by stakeholders, March – April 2024.
346 ECRE AIDA Database, 'Türkiye: Judicial Review of Administrative Detention Decisions', 28 May 2018, available here. Information provided by stakeholders, March – April 2026.
347 Information provided by stakeholders, March – April 2024.
348 Information from a stakeholder, May 2022.
349 Mülteci-der, Menşe Ülke Bilgi Notları, available here.
350 Mülteci-der, AİHM Kararları, available here
351 TBB, *Menşe Ülke Bilgileri Erişim Platformu*, June 2025, available here.

to be influenced by the decisions issued by newer courts in other provinces, which are 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.[352]

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.[353]Also, Eskişehir 1st Administrative Court dismissed two separate actions brought by Afghanistan nationals seeking annulment of negative international protection decisions issued by the Eskişehir Provincial Directorate of Migration Management. In both cases, the applicants were former members of the Afghan security forces, one a rank-and-file soldier, the other a captain, who claimed to face Taliban persecution upon return due to their military service, citing risks of torture, execution, or other serious harm. The court rejected both claims on broadly consistent grounds: the applicants' accounts were found to lack sufficient detail and documentary support, neither had been arrested, detained, or subjected to harm in Afghanistan, no group affiliation giving rise to a particular risk profile was established, and the fears expressed were not considered to rest on an objectively well-founded basis. In both decisions, the court further relied on the Taliban's amnesty declaration of August 2022, under which former Afghan National Army personnel were pardoned and their safety guaranteed, to conclude that military service alone did not constitute a sufficient ground for international protection.[354]

In May 2025, Eskişehir 1st Administrative Court dismissed the application of a Cameroonian national, who had sought judicial review of the rejection of his international protection application by the Eskişehir PDMM. The applicant had submitted a detailed account involving threats from individuals suspected of being Boko Haram members, interference by security forces, and his subsequent flight from Cameroon, circumstances that would ordinarily warrant further country of origin information research and a thorough credibility assessment. However, the court upheld the rejection on the grounds that the applicant had failed to substantiate his claims with documentary evidence, that he had not been subjected to any ill-treatment beyond the incidents described, that he had no prior arrests or group affiliations, and that the threats he described were characterised as pertaining to ordinary criminal matters rather than persecution within the meaning of international protection law.[355]

In late 2025 and early 2026, certain PDMM offices, including Van, were reported to have begun recording the case number of applicants who had appealed a rejection decision on the reverse side of their ID cards.[356]

1.4.3 Onward appeal before the Regional Administrative Court

Applicants have the possibility of filing an onward appeal with the Regional Administrative Court within 30 days.[357] 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.[358] In practice, rather than engaging

352 Information provided multiple stakeholders March 2025.
353 T.C. Kayseri 1. İdare Mahkemesi, 2024/1597 E., 2025/229 K., 24.01.2025.
354 T.C. Eskişehir 1. İdare Mahkemesi 2025/163 E., 2025/1369 K., 3.10.2025; T.C. Eskişehir 1. İdare Mahkemesi 2025/552 E., 2025/1432 K., 13 October 2025.
355 T.C. Eskişehir 1. İdare Mahkemesi, 2024/1367E.,2025/992 K., T: 30.05.2025
356 Information provided by a stakeholder, April 2026.
357 Article 45 Law on Administrative Court Procedures (Law No: 2577).
358 Information provided by multiple stakeholders April and May 2025

substantively with the grounds of appeal or providing independent reasoning, the Regional Administrative Court simply notes that the first instance decision is procedurally and legally sound and that the arguments raised do not warrant its annulment, disposing of the case in a single formulaic paragraph. In 2026, one observed case involving an Afghan family whose application had been rejected under the accelerated procedure, the Regional Administrative Court upheld the first instance dismissal without addressing the applicant's individual risk profile, and rendered the decision as final with no further avenue of appeal available.[359]

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.[360]

In principle, a notarised power of attorney is required for a lawyer to represent the asylum seeker,[361] 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.23.10734[362], the Ombudsman Institution reviewed a 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 on Human Rights, the Ombudsman Institution also referenced the Supreme Court's ruling recognising notaries as institutions of trust. In 2025, stakeholders reported that this practice is no longer observed.[363]

359 T.C. Antalya Bölge İdare Mahkemesi İkinci Dava Dairesi 2026/833 E., 2026/333 K., 25 February 2026.
360 Article 81(1) LFIP.
361 On this point, see Constitutional Court, Decision 2015/87, 8 October 2015, available in Turkish here.
362 X Avukat Hakları Grubu Ankara, 11.09.2023, available here.
363 Information provided by multiple stakeholders, March, April 2026.

1.5.1 Legal assistance at first instance

Lawyers and legal representatives can accompany applicants during the personal interview.[364] 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.[365] International protection applicants and status holders are also free to seek counselling services provided by NGOs.[366]

These safeguards, however, are inscribed as "freedoms" as opposed to "entitlements", which 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.

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 2025, 12,526 individuals benefited from the legal clinics.[367] From January to November 2025, legal clinics provided legal assistance across 11,103 cases involving refugees and asylum seekers. During the same period, a total of 1,385 individuals, including refugees from Afghanistan and Syria, were reached through awareness-raising sessions.[368] 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 2025, 55 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. The project received 3,595 submissions in the 2025 cycle until the end of October.[369]

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 2025, the majority of participating bar associations continued to refrain 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.[370]

364 Article 75(3) LFIP.
365 Article 94(2) LFIP.
366 Article 81(3) LFIP.
367 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.
368 UNHCR Türkiye, *Operational Update*, December 2025, available here.
369 UNHCR Türkiye, *Operational Update*, December 2025, available here.
370 Information provided by multiple stakeholders March, April and May 2025.

Due to budget-related issues,[371] the UTBA project often halts support during certain months until it is reactivated, causing problems in accessing lawyers. According to stakeholders, In 2025, appointments were reported only in January and February, with no further activity noted as of the end of May. Stakeholders reported that the project operated actively during the summer months, particularly in August, before being permanently closed in November. Although the project provides crucial support, bar associations should fund appointments from their own budgets when the project does not cover them. 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 applicants for international protection are not considered when the budget is planned. This also results in significantly less budget for legal aid in smaller provinces. Thus, some bar associations face significant budget challenges.[372]

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 pocket. 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 2025, as in previous years, concerns were reported as to whether those who are imposed a security code are allowed to get legal assistance under the scheme.[373] However, as problems with the legal aid system deepened, attention as 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 by an asylum seeker, a third party or a removal centre. Civil society organisations are the main source of referrals for legal aid; direct applications from refugees and migrants remain low. One contributing factor is that individuals held in RCs typically have access only by phone, and given language barriers, they predominantly reach out to NGOs with in-house interpreters. The NGO then assesses the legal necessity of the case and, where appropriate, refers it to the relevant bar association.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.[374] In addition, not all cases referred by NGOs are eligible for legal aid.[375] Stakeholders noted that it is not a realistic expectation for a non-Turkish-speaking applicant to independently draft a petition setting out legal arguments and submit it directly to the legal aid office. In this regard, civil society organisations effectively serve as a screening and filtering mechanism, bridging the gap between the applicant and formal legal aid structures.[376] . 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. 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.[377]

371 Information provided by stakeholders, March – April 2024.
372 Information provided by stakeholders, March – April 2024.
373 Information provided by stakeholders, March 2026.
374 Information provided by a stakeholder, May 2023.
375 Information provided by a stakeholder, May 2023.
376 Information probided by a stakeholder, March 2026.
377 Information provided by various stakeholder, May 2023.

Stakeholders reported that in 2025, some bar association boards, when approached, indicated that appointing a lawyer without the applicant's own signature, given their detention in a removal centre and the involvement of a third-party intermediary such as an NGO, would be procedurally problematic, beyond the economic constraints already in place. At the same time, stakeholders noted that this arrangement has in practice been the standard operating model for many years, and that the very projects in which these bar associations participate continue to function on precisely that basis.[378] Some Bar Associations insisted on confirming the detainee's presence at a certain RC by contacting the RC officials, which usually resulted in no response from the RC side, negatively affecting access to legal remedies under detention.[379]

The UTBA project has been providing a telephone interpretation service in four languages (Arabic, Persian, Dari, and French) for and lawyers offering legal help to Syrian and non-Syrian applicants. This service can be used in some Removal Centres where lawyers have a fixed line.[380] In 2025, stakeholders reported that the service could be used in Tuzla RC.[381]

Within the scope of 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 utilise 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 system[382]. 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 specialised training. The project concluded its operations in September 2025, with a final evaluation meeting held in Ankara on 30 September 2025 under the broader "Horizontal Facility for the Western Balkans and Türkiye" programme, bringing together representatives of the Union Delegation, the Council of Europe, and the Union of Turkish Bar Associations.[383]

The LEAP programme, operated by UNICEF in partnership with the Union of Turkish Bar Associations (UTBA) concluded its operations by the end of 2025; participating lawyers were notified via a circular issued by the Union of Turkish Bar Associations in November 2025, with the final invoicing deadline set at 30 November 2025.[384]

According to a stakeholder, the Hatay Bar Association, benefiting from multiple legal aid projects, was able to utilise 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

378 Information provided by a stakeholder, August 2025.
379 Information provided by a stakeholder, April 2026.
380 TTBB, Tercüme Destek Hattı, available here.
381 Information provided by a stakeholder, February 2026.
382 CoE, *Increasing women's knowledge of their rights following the earthquakes in Türkiye*, December 2023, available here.
383 TBB, *Türkiye'de kadınların adalete erişiminin desteklenmesi projesi nihai değerlendirme toplantısı ankara'da yapıldı*, 30 September 2025, available here.
384 Information provided by a stakeholder, February 2026.

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 services.[385] In February 2026, the project convened a regional coordination meeting in Kocaeli for the Marmara Region, bringing together bar association representatives to advance a common implementation standard for child-friendly legal aid.[386] In April 2026, the project culminated in a three-day international congress held in Ankara, where legal practitioners, child rights experts, and policymakers gathered to discuss child-friendly justice, restorative approaches, and multidisciplinary interventions across nine panels and four parallel workshops.[387]

In January 2024, the Şanlıurfa Bar Association launched a three-year project funded by the European Commission's Democracy and Human Rights Thematic Programme, implemented in partnership with the Association for Access to the Right to a Fair Trial (AYHED). The project aims to strengthen the legal capacity of lawyers, bar mechanisms, and local civil society to combat human rights violations in the Şanlıurfa region, with a particular focus on children, women, victims of torture and ill-treatment, and groups targeted by hate crimes. Key outputs include the establishment of a Human Rights Violations Memory Centre and digital archive within the bar, the formation of thematic committees comprising forty lawyers, and legal support for at least forty cases, eight of which are to be pursued as strategic litigation before national and international human rights mechanisms.[388]

In November 2025, the Gaziantep Bar Association launched a new twelve-month project funded by the Dutch Embassy through the MATRA Programme. The project aims to strengthen access to justice for women and vulnerable groups, including refugees, children, and persons with disabilities, through legal counseling, capacity building, and human rights monitoring in detention facilities and removal centres.[389]

In 2025, the Union of Turkish Bar Associations launched the Project for Strengthening National Voluntary Return Mechanisms for Voluntary, Safe, Dignified and Orderly Returns to Syria (GGD), which continued into 2026.[390] In 2026, four additional projects were initiated: the Project for Promoting Civil Society Participation and Capacity in Ensuring Access to Justice in Türkiye (CSF), the Programme for Strengthening the Capacity of Legal Aid (SCLA), the Protection Project for Supporting Children's Access to Justice (KORU), and the Project for Enhancing Protection and Legal Aid for Vulnerable Refugees (CARE). The CSF project operated in Şanlıurfa, Malatya, and Van; the SCLA project covered a broad network of provinces spanning all regions of Türkiye, including Istanbul, Ankara, Izmir, Diyarbakır, Gaziantep, Hatay, and numerous others; the GGD project similarly operated across a wide geographic footprint, reaching provinces such as Ankara, Diyarbakır, Gaziantep, Hatay, Istanbul, Izmir, and many additional provinces across the country; the KORU project focused on Hatay; and the CARE project operated in Adana.[391]

Beyond the involvement of bar associations, several NGOs provide 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

385 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.
386 TBB, *Çaba projesi bölgesel koordinasyon toplantisi kocaeli'de yapildi*, 10 February 2026, available here.
387 TBB, *Çaba Projesi "İlkelerden Uygulamaya Çocuklar İçin Adaleti Yeniden Düşünmek" Uluslararası Kongre*, 07 April 2026, available here.
388 AYHED, *Haklara Erişimde Dezavantajlı Gruplar İzleme Raporu*, January 2026, available here.
389 Gaziantep Barosu, Proje Bilgisi, 27 November 2025, available here.
390 TBB, *Gönüllü geri dönüşler için adli yardim çevrimiçi eğitimi*, 10 November 2025, available here.
391 TBB, *Türkiye Barolar Birliği Tarafından Yürütülen Adli Yardım Projelerine Giriş Eğitimi*, 10 March 2026, available here.

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, Mülteciler Derneği, MUDEM, Human Resource Development Foundation (HRDF) and Red Umbrella Sexual Health and Human Rights Association among others. In 2025 the funding cuts to USAID and PRM had a significant impact on civil society organisations operating in the field of refugee protection in Türkiye. HRDF closed one of its Istanbul offices and ceased operations in Bilecik, while Refugee Rights Türkiye halted its operations in İzmir and Van.

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.[392] 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 February to June and August to December2025 in several cities had a direct impact on refugee legal aid services.[393]

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.[394] In a decision dated 30 May 2023, the Ombudsman Institution issued a recommendation that no fee should be charged for power of attorney documents arranged at notaries when legal aid requests are accepted.

2. Dublin

The Dublin III Regulation does not apply in Türkiye.

392 Article 81(2) LFIP.
393 Information provided by stakeholders, April 2023 and March – April 2024.
394 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.[395] However, the examination of inadmissibility criteria under Article 72 LFIP must be carried out by the PDMM during the Registration stage.[396]

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.[397] 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.

395 Article 72(2) LFIP; Article 74(3) RFIP.
396 Article 73 RFIP.
397 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?
   ☒ Yes ☐ No
   - ❖ If yes, is it ☒ Judicial ☐ Administrative
   - ❖ If yes, is it suspensive ☒ Yes ☐ No

Inadmissibility decisions can only be appealed before the competent Administrative Court.[398] 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.[399] The application before 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 (see 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.[400]

3.4 Legal assistance

Indicators: Admissibility Procedure: Legal Assistance
☒ Same as regular procedure

3. 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

4. Do asylum seekers have access to free legal assistance on appeal against an inadmissibility decision in practice? ☐ Yes ☒ With difficulty ☐ No
   - ❖ Does free legal assistance cover ☒ Representation in courts ☒ 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.[401]

398 Article 80(1)(a) LFIP.
399 Article 80(1)(ç) LFIP.
400 Constitutional Court, Decision 2016/134, 14 July 2016, available in Turkish here.
401 Article 67(1) RFIP.

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 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.[402]

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 the accelerated procedure criteria under Article 79 LFIP must be carried out by the PDMM during the Registration stage.[403]

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.[404] Where this time limit cannot be complied with, the applicant may be taken out of the accelerated procedure and referred to the regular procedure.[405]

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. 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.

402 Ibid.
403 Article 73 RFIP.
404 Article 79(2) LFIP.
405 Article 79(3) LFIP; Article 80(3) RFIP.

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.[406] 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 before 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 often addressed the issue from a procedural standpoint, without evaluating the substance of the applicant's claims, and 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.[407]

406 Information provided by a stakeholder, May 2022.
407 T.C. Denizli 1. İdare Mahkemesi 2022/2617 E., 2024/532 K., 29.03.2024 T.

Stakeholders also reported a recent practice of rejecting international protection applications by persons who remained under the applicant status for extended periods of time, such as 7 to 10 years. These rejections, often issued under the accelerated procedure, have also been dismissed by administrative courts. For instance, in April 2025, an Afghanistan 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 Afghanistan national with an application pending since 2016.[408] In 2025, stakeholders continued to observe that the accelerated procedure was being applied in cases where the normal procedure should have been used. Concerns persisted regarding the erosion of procedural guarantees under this procedure, notably the reduction of the appeal time limit from thirty to fifteen days and the absence of a right to challenge the district court's decision on appeal.[409]

According to the strategic plan of PMM, it aims to ensure the effective implementation of the accelerated procedure mechanism.[410]

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.[411]

408 Information provided by a stakeholder May 2025.
409 Information provided by a stakeholder, February 2026.
410 PMM, Stratejik Plan 2024-2028.
411 Information provided by several stakeholders, May 2023.

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.'[412]

Neither the LFIP nor the RFIP include LGBTIQ+ persons in the list of categories of 'persons with special needs'. In the past, problems regarding the way applicants were interviewed about issues pertaining to sexual orientation and gender identity were reported. These ranged from inappropriate terminology or offensive questions to verbal abuse during registration interviews. In 2022, stakeholders reported that protection offices and migration officers were well trained by UNHCR and were significantly more professional. However, in 2024, during interviews with LGBTIQ+ refugees, unnecessary and sometimes psychologically abusive questions were asked to determine if individuals were indeed LGBTIQ+[413] (see Regular procedure: Personal interview).

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.[414] 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 LGBTIQ+ individuals (see: Alternatives to Detention). In 2025, requests for proof indicating their membership to any LGBTIQ+ association, photos with LGBTIQ+ flag or any other supportive documents continued.[415]

In total, 67,407 persons with special needs were identified in 2025 by PDMMs.[416]

1.1 Screening of vulnerability

RFIP states that it "shall be primarily determined" whether the applicant is a person with special needs.[417] The PDMM are required to make an assessment during registration as to 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 they have been identified as such. An applicant may also be identified as a "person with special needs" later on in the procedure.[418]

412 Article 3(1)(l) LFIP.
413 KAOS GL, 10 şehirden avukatlar, mülteci LGBTİ+'ların hakları için buluştu, 6 December 2023, available here.
414 Information provided by a stakeholder, March 2024.
415 Information provided by a stakeholder, May 2026.
416 PMM, *Faaliyet Raporu 2025*, available here.
417 Article 113(1) RFIP.
418 Article 113(2) RFIP.

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.[419]

No official mechanism for the identification of vulnerabilities in the asylum procedure has been established as of December 2025. 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.[420] Nevertheless, UNHCR still refers vulnerable cases to the PDMM to prioritise registration.

According to stakeholders, in 2025, 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. UNHCR continued to support PMM in operating Protection Desks in 50 PDMMs across the country, which are designed to assist with the timely identification and referral of persons with specific needs and to ensure tailored services are provided to them.[421]

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.[422] The applicant shall be notified as to the reason of this referral and the age assessment proceedings that will be undertaken.[423]

If the age assessment exercise indicates without a doubt that the applicant is 18 years of age or older, they 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 contain 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.[424] 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.[425]

419 Article 113(3) RFIP.
420 Information provided by various stakeholders, May-June 2023.
421 UNHCR, *UNHCR'S support to protection desks for refugees and asylum seekers in Türkiye - April 2026*, available here.
422 Article 123(2)(b) RFIP.
423 Article 123(2)(c) RFIP.
424 Article 6 Ministry of Family and Social Services Directive No 152065 on Unaccompanied Children.
425 Information provided by a stakeholder, May 2023 and March 2024.

However, since it is not possible for unaccompanied minors to be accepted into 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.[426] The MoFSS operates Child Protection First Intervention and Assessment Units (ÇOKİM), which carry out judicial, administrative, and professional proceedings for children assessed as being in need of protection until an appropriate placement or handover to a legal guardian is arranged. As of 2025, a total of 34 first reception institutions and 82 first reception units are operational nationwide, with efforts ongoing to establish ÇOKİMs as independent units by 2026.[427] However, no information is available regarding any specific procedure applicable prior to age assessment, nor have stakeholders provided clarity on how these facilities are utilised in practice in such cases.

Moreover, it is reported that in most provinces, both the MoFSP and the PDMM defer applications regarding 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.[428]

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 undergo 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.[429]

When children are caught attempting to illegally leave the country, their 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 behaviour. If the child is not sure of their age or says they are 17, they get documented as 18. The majority of African children are 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. It can be very difficult to know whether a child is in an RC 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. [430]

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

426 Mülteci Hakları Merkezi, Türkiye'deki Refakatsiz Sığınmacı Çocukların Hukuksal Korumaya Erişimi: Tespitler ve Değerlendirmeler, September 2022, available here.
427 T.C. Aile ve Sosyal Hizmetler Bakanlığı, *2025 Yılı Faaliyet Raporu*, available here.
428 Mülteci Hakları Merkezi, Türkiye'deki Refakatsiz Sığınmacı Çocukların Hukuksal Korumaya Erişimi: Tespitler ve Değerlendirmeler, September 2022, available here.
429 Medico International, 2023, What safety are they talking about?" Why Turkey cannot be considered a 'safe third country'– an expert opinion.
430 Information Portal for Refugees in Turkey, 'Rights and Procedures for Unaccompanied Minors', available here.

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.[431]

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.[432] 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.

The RFIP foresees that interviews with children shall be conducted by trained personnel, sufficiently informed on the child's psychological, emotional and physical development.[433] The decision-making official shall give due regard to the possibility that the child may not have been able to fully substantially 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 2025, 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.[434]

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.[435] 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.[436]

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.

431 Information provided by a stakeholder, February 2025
432 Article 75(3) LFIP.
433 Article 123(2)(g) RFIP.
434 Information provided by a stakeholder, April 2025
435 Article 67 LFIP; Article 113(2) RFIP.
436 Article 65(2) RFIP.

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 LIFP 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 rely upon medical reports. There are challenges in obtaining such reports due to the difficulties in accessing hospitals without a valid ID given by Turkish authorities.[437] Stakeholders also noted a general reluctance among applicants to submit medical documentation during the application phase, as doing so may create the impression that the applicant entered Türkiye primarily to access healthcare rather than to seek protection.[438]

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 Law[439] 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.[440] Specifically, all children who do not benefit from the custody of parents (*velayet*) must be provided guardianship (*vesayet*).[441] 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 as guardians.[442] 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.

437 Information provided by stakeholders, March – April 2024.
438 Information provided by a stakeholder April 2026.
439 Law No 4395 on Child Protection.
440 Law No 4721 on the Civil Code.
441 Article 404 Civil Code.
442 Articles 413, 414, 418 Civil Code.

Guardians are responsible for protecting the personal and material interests of the minors in their responsibility and represent their interests in legal proceedings.[443] 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.[444] In 2024 and 2025 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.[445]

A study[446] 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 improvements in the specialisation of lawyers in refugee law, the specific competence for assisting unaccompanied asylum-seeking children remains inadequate.[447]

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 is where 'the applicant submitted the same claim without presenting any new elements'. In such a case, the PDMM shall issue an inadmissibility decision and notify the PMM Headquarters within 24 hours; however, there is no time limit for taking an inadmissibility decision.

443 Articles 445-448 Civil Code.
444 Article 456 Civil Code.
445 Information provided by a stakeholder, April 2025.
446 Süleyman Dost ve Nedime Sevde Gökez, 'Sığınmacı Refakatsiz Çocukların Korunması ve Hukuki Temsili' (2024) 14(1) Süleyman Demirel Üniversitesi Hukuk Fakültesi Dergisi 421, 463.
447 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 the accelerated procedure. Whereas the inadmissibility decisions are also finalised by the PDMM, status decisions in the accelerated procedure are 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 specifies 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.[448] This practice continued in 2025.[449]

F. The safe country concepts

Indicators: Safe Country Concepts

1.	Does national legislation allow for the use of "safe country of origin" concept?	☐ Yes ☒ No
	❖ Is there a national list of safe countries of origin?	☐ Yes ☒ No
	❖ Is the safe country of origin concept used in practice?	☐ Yes ☒ No
2.	Does national legislation allow for the use of "safe third country" concept?	☒ Yes ☐ No
	❖ Is the safe third country concept used in practice?	☒ Yes ☐ No
3.	Does national legislation allow for the use of "first country of asylum" concept?	☒ Yes ☐ 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

448 Information provided by a stakeholder, February 2025.
449 Information provided by a stakeholder, March 2026.

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 is issued under Article 72 LFIP.

One relevant development under the recast Asylum Procedures Regulation, part of the New Pact on Migration and Asylum, is that EU accession candidate countries, a category that includes Türkiye, are to be presumed as safe countries of origin at Union level, unless relevant circumstances such as indiscriminate violence in the context of an armed conflict apply. This follows from the provisional political agreement reached between the Council and the European Parliament on 18 December 2025 establishing the first EU-wide list of safe countries of origin; the European Parliament formally adopted the text in February 2026, pending formal Council adoption. The relevant provisions are set to apply from 12 June 2026, alongside the Asylum Procedure Regulation.[450]

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 where he or she can still enjoy sufficient and effective protection including protection against *refoulement*.'[451]

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:[452]

(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 they are granted refugee status by the country authorities, they have 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

450 European Commission, *Asylum policy: Council and European Parliament agree on EU list of safe countries of origin*, 18 December 2025, available here.
451 Article 73 LFIP; Article 75 RFIP. The wording resembles the EU definition in Article 35 recast Asylum Procedures Directive.
452 Article 74 LFIP. The wording resembles the EU definition in Article 38 recast Asylum Procedures Directive.

the third country are of a nature that would make the applicant's return to that country reasonable.'[453]

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 their ability to speak the language of the country at a good level;
(ç) The applicant has previously been in the county 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 regarding international protection applicants. There is no public information as to 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 administrative 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 Removal and refoulement.

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 timeframes, 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 Iletisim 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. In 2025, YIMER received 2,245,902 calls. Additionally, 115 migration "kiosk" devices have been installed in 81 provinces and 7 airports. These devices provide round-the-clock access to a

[453] Article 74(3) LFIP.

range of services, including notification of residence obligation, e-residence permits, e-appointments, and address registration, as well as informational resources directed at foreign nationals.[454]

In addition, UNHCR has set up a platform ("Help")[455] which provides information in English, Turkish, Arabic and Farsi. The Platform provides refugees and asylum seekers with accessible guidance on their rights, obligations, and available services in Türkiye, including referral pathways for further assistance. Mainstream NGOs such as SGDD-ASAM, Support to Life, Human Resource Development Foundation (*İnsan Kaynağını Geliştirme Vakfı*, HRDF), YUVA also provide assistance and counselling. Refugee Rights Turkiye has an online portal providing information on registration, legal assistance, access to rights, detention, unaccompanied children etc. in 10 languages.[456]

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.

The UNHCR Counselling Line provides counselling on legal status, access to services, resettlement procedures, financial assistance, and protection risks. Dedicated lines for complaints and GBV further strengthened accountability and protection from sexual exploitation and abuse.[457] Currently, 50 operators manage these calls in 13 languages, including Arabic, Farsi, English, Turkish, French, Kurdish, and Somali, with additional languages like Pashtu, Urdu, and Russian available upon request. In 2025, the UNHCR Türkiye Counselling Line received 200,000 calls.[458] Between January and November 2024, UNHCR Türkiye's Counselling Line responded calls from 81 provinces, with Syrians constituting the largest group of callers (39 per cent), followed by Afghans (37 per cent), Iranians (15 per cent), and Iraqis (5 per cent). Resettlement inquiries accounted for the majority of calls (51 per cent), followed by legal assistance (14 per cent) and financial assistance (12 per cent).[459]

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 2025, the UNHCR Türkiye Information Board on Facebook had more than 107,000 followers. In October 2025, UNHCR Türkiye migrated to the upgraded Help 2.0 interface, becoming one of five country operations globally to do so. The new platform

454 PMM, *Göç Kiosk Cihazları*, available here.
455 UNHCR Help, available here.
456 RRT, *Information Portal for Refugees in Turkey*, available here.
457 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.
458 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.
459 UNHCR Türkiye, *Monthly Operational Update*, December 2025, available here.

offers a more user-friendly design, improved accessibility for persons with disabilities, enhanced mobile compatibility, a faster search function, a simplified contact form directing queries to the appropriate UNHCR teams, and expanded language options to ensure clearer information for diverse audiences.[460] According to AHCSA report, in 2025, while over 62 per cent of respondents had contacted UNHCR at least once, only 18 per cent reported that their issue had been resolved, with more than 81 per cent receiving no effective response.[461]

SGDD-ASAM, the largest NGO and implementing partner of UNHCR in Türkiye, has seen a sharp contraction in its field presence: it operated 68 offices before 2024, which had fallen to 28 offices in 20 provinces by May 2025, and further declined to 13 offices in provinces as of July 2026. It continues to provide counselling and information services through its remaining offices. 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 Turkiye 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, while HRDF also reduced its office number from six to four and has offices in Istanbul, Eskişehir, Ağrı and Van 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 organisations 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 like AHCSA that are well connected with their communities, providing information and support. 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. Insani Yardim 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+. UNFPA 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**.

Stakeholders have emphasised that while the number of applicants and beneficiaries has not decreased, NGO capacity to respond to them has. As a result, the remaining offices and staff have been stretched thin trying to match the level of need, and some applicants are consequently unable to access NGO services altogether. Stakeholders noted that the most severe impact of these funding cuts is observed in access to

460 UNHCR, Help 2.0: A digital lifeline reimagined, October 2025, available here.
461 AHCSA, *Multi-Dimensional Assessment of the Situation of Afghan and Iranian Refugees in Turkey*, 29 November 2025, available here.

healthcare, where applicants continue to rely on NGO-provided interpreters to secure even basic hospital appointments. A similar concern was raised with respect to GBV cases, where the presence of an NGO caseworker accompanying the victim can materially affect the trajectory and outcome of the case (See: Reception of Survivors of Torture and Violence).

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. For instance, a Syrian who had previously resided in Türkiye but was forced to leave due to the expiration of his residence permit re-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.[462]

According to Ali Yerlikaya, no more temporary protection registrations had been made since June 2022.[463] Following the change of regime in Syria in December 2024, Syrians have no longer been regarded as prima facie refugees on political grounds; however, the temporary protection regulation remains in force. (See: Content of Temporary Protection)

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 2025.

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.

462 Information provided by a stakeholder, May 2023.
463 İçişleri Bakanı Ali Yerlikaya: “Göçü Kaynağında Durdurduk”, 14 August 2024, available here.

3. Afghanistan

The barriers to access the procedure following the takeover of registration of applicants for international protection by PMM in 2018 (see Registration) have had particularly adverse effects on Afghan nationals.

This situation for Afghan refugees in Türkiye remained extremely difficult in 2024.[464] 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.[465] 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 number of Afghans entering Türkiye after August 2021 were 'secular and educated families'.[466]

A report published in November 2025 by the Afghanistan Hazaras Culture and Solidarity Association (AHCSA) provides a detailed account of the structural conditions faced by Afghanistan and Iran nationals in Türkiye, based on a mixed-methods study involving 193 survey participants, focus group discussions, and in-depth interviews with individuals who had left Türkiye through irregular routes. The findings paint a picture of compounding vulnerabilities in which legal status functions as the primary determinant of access to employment, healthcare, education, and legal support. Nearly 60 per cent of respondents reported experiencing discrimination in their place of residence, with undocumented individuals and those with rejected cases recording the highest levels; qualitative accounts further document that Afghan migrants are routinely labelled as irregular by police and local residents, paid below minimum wages on the pretext of lacking documentation, refused housing or charged higher rents, and, particularly in the case of Afghan women, subjected to compounded ethnic and gender-based discrimination. The absence of work permits, affecting over 90 per cent of respondents, has confined the overwhelming majority to the informal labour market under conditions of exploitation, with employers routinely avoiding work contracts and social insurance. Among undocumented respondents, approximately 62 per cent reported having attempted to leave Türkiye through irregular routes at least once, a figure exceeding 50 per cent among those with rejected cases; the primary drivers cited were fear of deportation, absence of future prospects, economic hardship, lack of access to healthcare and children's education, and discrimination. Of those who had previously attempted to leave, over half were stopped by border guards or police, while the remainder withdrew due to perceived danger or other obstacles. Approximately 32 per cent of all respondents considered it highly likely that they would attempt to leave within the following twelve months. The report's qualitative findings consistently establish that recourse to irregular onward migration reflects not a desire to reach Europe but a structural dead-end in which safe stay, legal employment, access to services, and safe return are simultaneously foreclosed.[467]

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.[468] Afghan single males are the main group targeted by pushbacks to Iran.[469]

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464 ICMPD, 'Migration Outlook 2022 Western Balkans & Turkey Nine migration issues to look out for in 2022', 2022, available & Information provided by stakeholders, March – April 2024.
465 Information provided by several stakeholders, May-June 2023 and March – April 2024.
466 DW, 'Meclis'ten göç raporu: Cezalar yetersiz', 10 June 2022, available in Turkish here.
467 AHCSA, *Multi-Dimensional Assessment of the Situation of Afghan and Iranian Refugees in Turkey*, 29 November 2025, available here.
468 Information provided by various stakeholders, May- June 2023 & Information provided by stakeholders, March-April 2024.
469 Information provided by stakeholders, March- April 2024.

The forced/voluntary returns of Afghans, after halting for a couple of months following the fall of Kabul, started in 2022, and continued in 2025.[470]

4. Iran

Iranians constitute one of the largest groups both residing under residence permits, ranking fourth in 2025 with 76,531 holders, and seeking or holding international protection in Türkiye. In 2025, they represented the third largest nationality group among new international protection applicants.[471]

In 2025, stakeholders reported that a significant number of Iranians who had been granted conditional refugee status in previous years were notified that their status had been revoked. As these decisions were communicated through the National Electronic Notification System (UETS), many individuals missed the applicable appeal deadline, with some subsequently being referred directly to removal centres. Only a minority were able to challenge the revocation decisions. Stakeholders further noted that the vast majority of these revocations concerned applicants whose claims were based on fear of religious persecution in Iran.[472]

5. 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.[473] As of June 2025, the numbers of Ukrainian displaced people decreased to 35,170, including 2,400 who applied for international protection.[474] 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, Kirklareli, and Eskişehir.** As of January 2026, the total number of Ukrainians residing in Türkiye has not been disclosed by the authorities; however, available figures indicate that 21,143 hold a short-term residence permit and 6,489 hold a family residence permit.[475] ,. There is a tendency not to apply for International Protection, as they prefer to stay in Türkiye with a residence permit,in order to be able to travel back to Ukraine or move to EU countries.[476]

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 had relatives in Türkiye); (2) applicants for international protection whose economic conditions were worse compared to other groups and who had no contacts in Türkiye; (3) Ukrainians with 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 with permanent residence *(iskanli gocmen)* in Türkiye.

Between 2022 and 2024, 510 Ukrainian orphaned children were brought to Antalya under the "Childhood Without War Project" run by the Ruslan Shostak Foundation, following an agreement facilitated at the

470 Information provided by multiple stakeholders, May and June 2026.
471 PMM, *Statistics*, available here.
472 Information provided by multiple stakeholders, March and April 2026.
473 Ukrinform, More than 31,500 Ukrainian citizens officially reside in Turkey, 17.01.2025, available here.
474 UNHCR, Ukraine Refugee Situation, available here.
475 PMM, *Statistics*, available here.
476 Information provided by stakeholders, March- April 2024.

highest diplomatic level. A March 2024 inspection by a delegation including representatives of the Ukrainian Parliament's Human Rights Commissioner, the Dnipropetrovsk Regional Military Administration, Türkiye's Ombudsman Institution, and UNICEF Türkiye revealed a serious pattern of neglect and abuse. The inspection report, signed by eleven Ukrainian officials, documented psychological and sexual abuse, including two minors who were impregnated by hotel staff. Both girls were subsequently sent back to Ukraine without institutional support, and one attempted suicide. Children were also subjected to mistreatment by Ukrainian educators, denied adequate medical care and nutrition, and coerced into participating in fundraising activities, with those who refused being penalised. Both the Ukrainian and Turkish investigations into the incidents were ultimately closed without any convictions.[477]

6. Turkmenistan, Uzbekistan and Tajikistan

In 2025, Turkmen nationals constituted the largest group of residence permit holders in Türkiye with 183,631 permits, while Uzbek nationals ranked sixth with 68,247.[478]

Recent developments indicate that nationals of both countries have faced an elevated risk of detention and deportation. In one emblematic case, a Turkmen dissident who had been legally residing in Türkiye since 2017, was detained in May 2025 and transferred to a deportation centre in Istanbul, following the cancellation of her residence permit and the issuance of a deportation order citing public order and security grounds. Her lawyer filed an appeal against the deportation decision, while Human Rights Watch raised serious concerns regarding the risk of persecution, torture, and ill-treatment she would face upon return to Turkmenistan.[479] In another case, two Turkmen dissident bloggers were detained in April 2025 and held in deportation centres for several months. Although the Constitutional Court issued a ruling in July 2025 temporarily suspending their deportation order, both men were reported missing following their purported release from the Edirne RC on 24 July 2025, with their whereabouts remaining unknown and concerns mounting regarding a possible unlawful transfer to Turkmenistan.[480] Stakeholders further reported that numerous other individuals, whose identities have not been disclosed, have similarly been at risk of apprehension or are currently held in removal centre detention.[481] Stakeholders also highlight more basic, non-persecution-related challenges. They note that if a Turkmen national remains abroad in an irregular status, the Turkmenistan consulate will not process a passport application for them; instead, they are expected to return to their country of origin. Once they return, they are subject to a five-year exit ban, imposed either because they applied for asylum abroad or because they worked abroad without a permit.[482]

Regarding Uzbek nationals, stakeholders reported that in 2025, a significant number of long-term Uzbek residents holding conditional refugee status, some of whom had been residing in Türkiye since 2009 or 2010, were subjected to simultaneous status revocations and police raids on their homes, with investigations opened on the grounds of alleged association with DAESH. In several cases, individuals were reportedly prevented from effectively utilising available legal remedies.[483]

One reported case concerns a married father of four who had been living in Türkiye for 13 years after fleeing religious persecution in Uzbekistan. He was detained in Kocaeli while asylum procedures were still ongoing

477 Agos, *Türkiye'ye getirilen Ukraynalı yetimlere yönelik ihmal ve istismar zinciri*, 01 December 2025, available here.
478 PMM, *Statistics*, available here.
479 HRW, *Türkiye: Free Turkmen Activist; Halt Deportation*, 03 June 2025, available here.
480 HRW, *Türkiye: Turkmen Risking Deportation Reported Missing*, 30 June 2025, available here; Evrensel, Gergerlioğlu, *Edirne GGM'deki kayıp iddialarını sordu: Alisher Sahatov ve Abdulla Orusov nerede?,* 11 March 2026, available here.
481 Information provided by multiple stakeholders, March and April 2026.
482 Information provided by multiple stakeholders, March, April and May 2026.
483 Information provided by a stakeholder, April 2026.

and before a final decision had been reached, and was subsequently reported to have been deported to Uzbekistan.[484]

Stakeholders report that information provided by the intelligence services of Central Asian countries of origin is reportedly accepted by the Turkish authorities without adequate scrutiny or filtering. For instance, individuals from countries such as Turkmenistan or Uzbekistan have reportedly been informed by the authorities that, while they have not committed any offence, their country of origin has submitted documentation concerning them. Stakeholders emphasise that such information is not critically assessed, despite the risk that the individual concerned may be targeted by their country of origin precisely because of their refugee claim. One stakeholder noted that Tajikistan's intelligence services can reportedly secure the removal of a targeted individual with relative ease when they seek to do so, and that Tajik nationals whom the authorities wish to pursue can be placed at serious risk as a result.[485]

7. Other nationalities

In 2023, there was a policy change regarding issuing residence permits, whereby a number of short-term residence permits applications were denied.[486] In 2024 and 2025, this trend continued, with PDMM offices increasingly refusing to accept short-term residence permit applications. In case of need for protection after residence permits were not prolonged, people have faced difficulties accessing 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 in such cases has no suspensive effect, unlike in deportation cases.[487] While the underlying rationale remains unclear, one possible explanation is that the authorities seek to reduce the overall number of foreign nationals residing in Türkiye. At the same time, the lack of clarity and consistency in residence permit policies has created conditions in which individuals are increasingly vulnerable to fraud, with false promises of obtaining residence permits used to exploit those seeking regularisation of their status.[488]

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.[489] 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.[490] 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. As of January 2026, Russian nationals ranked fifth among all foreign nationals holding residence permits in Türkiye, with a total of 72,260 permit holders.[491]

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484 MepaNews, Türkiye bir Özbek sığınmacıyı daha sınır dışı etti, 14.11.2025, available here.
485 İdame Medya, *BORALTAN KÖPRÜSÜ | Türkiye'de Mülteci Olmak*, 28 August 2025, available here; Information provided by multiple stakeholders, April 2026.
486 Information provided by stakeholders, March – April 2024.
487 Information provided by a stakeholder, April 2023.
488 T24, *Filipinli göçmenlere "oturum izni" tuzağı: 3 ilde 9 şüpheli gözaltında!*, 16 February 2026, available here.
489 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.
490 Burcu Karakas, 'Istanbul: Popular destination for Russian dissidents', DW, 07 February 2022, available here.
491 PMM, *Statistics*, available here.

Reception Conditions

As of end-2025, Türkiye hosted approximately 166,000 persons under international protection from Iraq, Afghanistan, Iran, and other countries of origin.[492] In 2025, 6,430 individuals applied for international protection in Türkiye, including 3,472 Afghans, 1,463 Iraqis, 585 Iranians, and 910 from other nationalities.[493]

In 2019, PMM issued the Cohesion Strategy and National Action Plan,[494] according to which six thematic areas are to be addressed: social cohesion, information, education, health, labour market and social support.As of 2024, the strategic plan is outdated, and no new plan is currently in effect. As of 2023, preparations for a new plan were reportedly underway; however, as of the end of 2025, no updated strategy has been made publicly available.[495]

Role and involvement of municipalities

Municipalities play a crucial role in providing social aid to all individuals, regardless of their status or nationality.[496] 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.[497]

For example, 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-ups.[498] 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.[499] Also, in İzmir, the Women's Services Unit of the Metropolitan Municipality, along with the Konak Municipality's community centre, collaborate with NGOs active in the migration field.[500] Main challenges faced by municipalities is lack of capacity, such as lack of translators,[501] lack of funding and public attitudes resisting the rights-based approach.[502]

In 2025, support provided by the Istanbul Metropolitan Municipality continued, including rental assistance and other socio-economic support for women recently exiting shelters; this support remained ongoing as of the reporting period. The situation at district level in Istanbul, however, varies considerably. Esenyurt district was identified as the district offering the poorest level of assistance and services to foreigners, including at the state hospital. In Zeytinburnu, services provided through AKDEM (the district's Women and Family Counselling Centre, operating under the municipality) continued, albeit at a reduced level, with support from civil society organisations, and food assistance continued to be provided by the municipality.

492 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.
493 PMM, *Statistics*, available here.
494 See PMM, *Uyum Strateji Belgesi ve Ulusal Eylem Planı 2018-2023*, available in Turkish here.
495 TİHEK, *Uyum Strateji Belgesi ve Ulusal Eylem Planı Güncelleme Çalıştayına Katılım Sağlandı*, 16 June 2023, available here.
496 Erdogan, Şener, and Ağca, Marmara'nın Kent Mültecileri: Belediyelerin Süreç Yönetimi, 2021, available here.
497 Belediyeler Kasım-Aralık 2021, Yerel Yönetimlerin Göç Politikaları, available here & Information provided by stakeholders, March – April 2024.
498 Information provided by stakeholders, March 2024.
499 Izmir Belediyesi, Belediye Çalışanları için Mültecilere Yönelik Bilgilendirme Kitapçığı, available here.
500 Information provided by a stakeholder, April 2025.
501 TESEV, Erginli & Akdoğan, *Belediyelerde Göç Veri Yönetimi ve Veriye Dayalı Karar Alma Politika Raporu*, 2024, available here.
502 Information provided by stakeholders, March 2024.

At the same time, Zeytinburnu Municipality was reported to have closed registration for sports courses to foreign nationals entirely.[503]

In 2020, the "Mayors' Migration Platform and Migration Policy Document"[504] 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 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) 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 was prepared to be implemented in 2020-2024. In the scope of the strategy, 4 main objectives were determined: coordination, capacity building, research and data collection, social cohesion.[505] However, due to the politisation of the topic, increased anti-migrant sentiments and lack of sufficient funding, visibility of the activities and services provided by municipalities decreased in 2024 and 2025. In 2025, The Migration and Cohesion Commission of the Union of Municipalities of Türkiye met to review prior decisions, ongoing field activities, and cooperation with the PMM, with discussions focused on establishing a platform to share municipal good practices and on deploying personnel for field observation of migration processes. Participants, including mayors, a migration expert, and civil society representatives, emphasised the balanced implementation of migration-related projects and the role of municipalities in this work, with a forthcoming meeting under the theme "Mayors Discuss Migration" placed on the Commission's agenda.[506]

The Istanbul Metropolitan Municipality Institute (ISMEK) offered training in pastry making, textiles, and barista skillsISMEK's pastry and textile machinery operator courses also continue in 2025.[507]

Anti-migrant sentiment and racism

Overall, social cohesion and targeted reception activities are difficult because refugees still face severe problems with their legal status and accessing registration.[508] The economic and social difficulties experienced by refugees/asylum-seekers living in Türkiye worsened in 2025. 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.[509] Racism and discrimination are pervasive in Türkiye and continued to be reported as an issue in 2025. removal centres.[510]

In September 2025, a foreign national worker was beaten to death at a workplace in Istanbul's Başakşehir district after being bound with plastic handcuffs by four individuals, one of whom was found by police holding a knife over the victim's body. Four suspects were taken into custody, and a criminal investigation was launched.[511]

503 Information provided by a stakeholder, May 2026.
504 Belediyeler Kasım-Aralık 2021, *Yerel Yönetimlerin Göç Politikaları*, available here.
505 UNHCR, *Migration and Social Cohesion Action Plan (2020-2024)* | *The Global Compact on Refugees*, available here.
506 TBB, *TBB'DE göç ve uyum komisyonu toplandi*, 9 January 2025, available here.
507 Information provided by a stakeholder May 2026.
508 Information provided by stakeholders, March - April 2024.
509 HBS Thessaloniki, *Media & Migration Association, Media Representation of Refugees and Migants in Turkey*, June 2023, available here.
510 TIHV & IHD, *Verilerle 2024 Yılında Türkiye'de İnsan Hakları İhlalleri*, 10 December 2024, available here.
511 Cumhuriyet, *İstanbul'da kan donduran olay… Ellerini ve ayaklarını bağladılar: İşçiyi döverek öldürdüler!,* 23 September 2025, available here.

In November 2025, a Syrian national was shot and killed during a security operation in Hatay's Dörtyol district. His family alleged that police had raided the wrong address and that he was shot in front of his children while requesting a brief moment for his wife to cover herself, with no ambulance was called following the shooting. The case was subsequently raised in parliament, and the police officer who fired the shot was reportedly suspended. The General Directorate of Security rejected the wrong-address claims, stating that the firearm discharged accidentally during a counter-terrorism operation. Contradictions between official reports prepared in Türkiye and Syria regarding the cause of death prompted parliamentary questions and a call for an independent investigation by the İHD Hatay Branch.[512] Mazlumder published a report addressing this incident.[513]

In May 2025, a Ghanaian national who had entered Türkiye in 2016 and had been held at Izmir Harmandalı Removal Centre for approximately eight months, died following a sequence of events that exposed in stark terms the acute vulnerability of foreign nationals to institutional neglect and ill-treatment. After being hospitalised with a respiratory infection on 5 May 2025, he was taken into police custody the same day he was discharged, on charges of damaging public property, and brought to the İzmir courthouse the following day in a state of severe incapacitation — transported in a wheelchair with his lower body wrapped in a black bin bag, unable to sit upright, speak, or comprehend what was happening around him. Despite his lawyer's attempts to have him declared unfit for questioning and referred to medical care, the presiding prosecutor dismissed these concerns, stating that he was "faking" his condition, and proceeded to take his statement regardless, even as he fell from his chair. Despite his evident critical condition, the duty judge ordered his remand in custody and rejected the defence lawyer's request for a medical referral; he was taken to prison, where authorities found him unconscious upon arrival, called an ambulance, and transferred him to İzmir City Hospital, where he remained in intensive care for twenty days before dying on 23 May 2025 from tuberculosis-related brain infection. His burial site remains uncertain, with reports suggesting he may have been interred in a paupers' cemetery.[514]

Since 2022, hate speech and restrictions towards refugees have been relayed by politicians. Particularly, the party leaders' anti-refugee rhetoric and campaign promises to "send refugees home" during the 2023 election campaigns in Türkiye alarmed refugees,[515] made them quite worried about their future in Turkiye[516] and forced them to invisibility.[517] This shift was particularly evident with the emergence of the anti-migrant Victory (Zafer) Party, which intensified the anti-refugee rhetoric.[518]

In 2025, with elections receding into the background, overtly anti-refugee rhetoric in public discourse became less prominent than in previous years. Nevertheless, Ümit Özdağ, the leader of the Victory Party, right-wing, anti-immigrant political party in Turkiye, appeared before a court in June 2025 charged with inciting hatred and enmity through the media and press, with the indictment alleging that his social media posts and public statements had contributed to the anti-Syrian riots that erupted in Kayseri in July 2024. In his defence submission, Özdağ reiterated and elaborated on the anti-refugee arguments that have characterised his political platform, claiming that mass migration from Syria and Afghanistan constituted a deliberate "strategic migration engineering" project aimed at destabilising and ultimately partitioning Türkiye. On economic grounds, he argued that refugee-related expenditure had reached at least 80 billion

512 İlketv, *Yanlış ev baskınında öldürüldü iddiası: Enes Gıyas Leyla'nın ölümü Meclis gündeminde*, 27 November 2025, available here.
513 Mazlumer, *Enes G. Layla Araştırma ve İnceleme Raporu*, 2026, available here
514 Sol, Hastayken tutuklanan, *ölüm döşeğinde tahliye edilen Ganalı'nın öyküsü: Michael Adufu nasıl öldü(rüldü)?*, 04 November 2025, available here
515 Euronews, 'Türkiye'de Suriyeli sığınmacılar endişeli', 19 May 2023, available in Turkish here.
516 VOA, 'Suriyeli Karşıtı Propagandanın Nedeni Ekonomik mi?', 2022, available here. & Information provided by stakeholders, March – April 2024.
517 Information provided by stakeholder, March – April 2024.
518 Nefret Döngüsü Günden İzleme Serisi, Seçim Özel, 2023, available here.

USD by 2025. On demographic grounds, he claimed that the birth rates of Syrian temporary protection holders were five times higher than those of Turkish citizens, warning of a fundamental shift in population balances in southern provinces. He further alleged that refugees constituted a security risk, asserting that foreign intelligence services had recruited agents from among naturalised Syrians, and that young unemployed refugees represented a significant potential for criminal activity. He additionally cited the strain on education and health systems, claiming that the re-emergence of diseases such as tuberculosis and measles was a consequence of refugee arrivals.[519] The dissemination of misinformation regarding refugees by prominent political figures also continued in 2025, with claims circulating that refugees were being admitted to universities without sitting entrance examinations.[520]

In January and February 2025, two administrative courts annulled separate municipal decisions imposing disproportionately high fees on foreigners, one concerning marriage registration fees and the other documentation fees, finding both decisions to be in violation of the right to marry, the right to found a family, and the principles of equality and non-discrimination.[521]

Some politicians expressed anti-refugee sentiments and engaged in discriminatory activities in the lead-up to the 2024 local elections (see AIDA Türkiye 2024 Report). 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.[522] 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.[523] In early 2025, an investigation initiated against the mayor of Bolu in northwestern Turkiye due to his speeches on migrants and refugees.[524] The investigation is on charges of hatred and discrimination under Article 122 of the Turkish Penal Code, following public statements in which he openly acknowledged that the measures he had taken against Syrian refugees in Bolu, including the unlawful revocation of business licences, the overnight removal of Arabic-language signage, and tenfold surcharges on water bills, were unlawful, adding that affected refugees had been unable to challenge these decisions at the time due to their lack of power to do so. The investigation, proceeded to trial before Bolu 6th Criminal Court of First Instance, which in September 2025 imposed a travel ban on the Mayor as a judicial supervision measure.[525] The Mayor publicly stated he was not remorseful and would repeat his actions if necessary.[526]

519 Ekonomim, *Ümit Özdağ hakim karşısında: İşte 51 sayfalık savunmasının tam metni*, 11 June 2025, available here.

520 X (formerly twitter), Muharrem İnce, 26 August 2025, available here

521 UMHD, *28 Şubat Sarayköy Belediyesi Meclis Kararları*, available here; UHMD, *Yabancilara nikah hizmeti ücretini 15.000 tl olarak belirleyen uşak belediyesi meclis kararinin iptali talep edilmiştir*, available here.

522 Serbestiyet, *CHP'li Afyon Belediye Başkanı Burcu Köksal sığınmacılara ait iş yerlerini kapattı: "Mültecilerin şehrimizden ayrılmaları için ne gerekiyorsa yapacağım"*, 20 April 2024, available here.

523 Yeniçağ, *Afgan'a Suriyeliye işyeri açma ruhsatı vermeyeceğim. Atmazsam şerefsizim. Herkes Uşak'ın yeni CHP'li başkanını konuşuyor*, 03 April 2024, available here.

524 BBC Türkçe, *Bolu Belediye Başkanı Tanju Özcan hakkında soruşturma başlatıldı*, 05 January 2025, available here.

525 T24, *Suriyeli sığınmacılara yönelik kararları nedeniyle soruşturma başlatılmıştı: Tanju Özcan'a yurt dışı yasağı!*, 29 September 2025, available here.

526 Independent Türkçe, *Tanju Özcan: Suriyelilerin ruhsatlarını hukuksuz şekilde iptal ettim, baktım yargıya gitmiyorlar sularına 10 kat zam yaptım*, 04 January 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 ☒ Yes ☐ Reduced material conditions ☐ No
   - ❖ Admissibility procedure ☐ Yes ☒ Reduced material conditions ☐ No
   - ❖ Accelerated procedure ☐ Yes ☒ Reduced material conditions ☐ No
   - ❖ First appeal ☒ Yes ☐ Reduced material conditions ☐ No
   - ❖ Onward appeal ☒ Yes ☐ Reduced material conditions ☐ No
   - ❖ Subsequent application ☒ Yes ☐ Reduced material conditions ☐ 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 accomodation; (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 provided to applicants processed under the regular procedure and those processed under 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 – 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. There is no means criterion for access to primary and secondary education and access to labour market. However, there is a means test for health care, social assistance and benefits and financial allowance. The PDMM shall conduct this assessment on the basis of the following considerations:[527]

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.[528]

Furthermore, the PMM "may" reduce rights and benefits, with the exception of education rights for children and basic health care, of applicants who fail to comply with the obligations listed in Article 89 LFIP or to whom a negative status decision was issued.[529]

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 2025 (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 to the provision of shelter to international protection on applicants,[530] 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**.[531]

Rights and benefits granted to international protection applicants and status holders may not exceed the level of rights and benefits afforded to citizens.[532]

527 Article 106(1) RFIP.
528 Article 90(1)(ç) LFIP.
529 Article 90(2) LFIP.
530 Article 95 LFIP.
531 PMM, *Removal centres*, available here.
532 Article 88(2) LFIP.

2.1 Financial allowance

International protection applicants who are identified to be "in need", may be allocated a financial allowance by PMM.[533] PMM shall establish the criteria and modalities for this financial allowance, and the Ministry of Finance's input is sought in determining the amounts. Applicants whose applications are identified to be inadmissible and those processed in accelerated procedure are excluded from financial allowance.

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 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.[534] 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.[535] Like all UNHCR cash assistance programmes, this support also ended in May 2025 due to funding cuts earlier in the year and, as of May 2026, had not been resumed.

2.2 Social assistance and benefits

International protection applicants identified "to be in need" can seek access to "social assistance and benefits".[536] 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 living[537] in 2024. As such, it is 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 fulfil their daily needs without the care and assistance of another family member. This is ongoing financial aid given to the carer. It is 4,302 TL / EUR if the disability rate is between 40% and 70%, and 6,454 TL / EUR if it is more than 70%, and 4,302 TL / EUR for children with disability.[538]

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533 Article 89(5) LFIP.
534 Article 90(1) LFIP.
535 Information provided by a stakeholder, June 2023.
536 Article 79(2) LFIP.
537 Sosyal Yardım Programlarımız, available here.
538 Habertürk, *Engelli maaşı ne kadar oldu? 2025 Zamlı engelli maaşı ne zaman yatacak, hangi tarihte?*, 04 July 2025, available here.

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 number of children in the household. There are biannual or yearly assessment periods after 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.[539]

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 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.[540] 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 prioritised for individuals considered to be in vulnerable situations.[541] In 2025, these supports also continued.[542]

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. These programmes continued in 2025, although stakeholders reported that access in practice became more restrictive, with fewer individuals able to meet eligibility requirements.[543] Stakeholders emphasised 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 economic situation in Türkiye

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 significantly worsened in 2025, 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 organisations require a bank account to process transfers.[544] In 2025, individuals without a bank account continued to face difficulties in receiving cash assistance. Legal practitioners reported that in some cases, a PTT (postal bank) account could be opened as an alternative, although this option was not always available.[545]

In 2025, 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 30.89%

539 UNHCR, *Social and financial assistance*, available here & Information provided by a stakeholder, March 2024.
540 Information provided by a stakeholder, May 2023.
541 Information provided by a stakeholder, May 2025.
542 Information provided by a stakeholder, May 2026
543 Information provided by a stakeholder, May 2026
544 Information provided by a stakeholder, May 2025.
545 Information provided by a stakeholder, May 2026

in 2025, which is lower than 2024 but still quite high. However, independent economists and academics claim that the 'real' inflation rate was 56.14%.[546] 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.

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.[547]

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 they have benefited from services, assistance and other benefits although they 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.[548] 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 provides that access to health care under Türkiye's General Health Insurance (*Genel Sağlık Sigortası*, GHI) is provided to applicants for international protection only during the first 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.[549]

The PDMM is responsible for and authorised to make 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 them 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, with the exception of access to education and basic healthcare, which must be maintained in all circumstances, must be based on a "personalised assessment" by the competent PDMM. The applicant must be notified in writing. Where they are not represented by a lawyer or legal representative, the legal consequences of the decision as well as the available appeal mechanisms must be explained to them.

546 BBC Türkçe, *2025 enflasyonu TÜİK'e göre %30,9 ENAG'a göre %56,1*, 05 January 2026, available here.
547 Article 90(2) LFIP.
548 Article 91(6) RFIP.
549 Law No 7196 amending several acts, 6 December 2019, available in Turkish here.

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.[550]

In 2025, in practice, however, the most common and visible consequence of such decisions is the deprivation of access to healthcare and education, the very rights that the law explicitly exempts from restriction. Individuals subject to such decisions are automatically removed from GHI coverage, and their children frequently encounter obstacles in school registration. Contrary to the statutory requirement, this deprivation is not communicated to the affected individuals as a distinct legal measure, nor are its consequences or available remedies explained to them.[551]

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" system[552]

Each applicant is assigned to a province, where they 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.

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.[553] 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.[554] 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 distincts remains the same, but the number of cities increased to 63.[555] According to the last available list, 62 provinces in Türkiye were listed as open/closed cities for the referral of international protection applicants.[556] However, they are mostly closed to international protection applications.[557] In 2025, no updates to this list were recorded.[558]

550 Article 80 LFIP.
551 Information provided by multiple stakeholders, February and March 2026.
552 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.
553 Article 2(hh) RFIP.
554 Article 66(3) RFIP.
555 PMM, "İstanbul'da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı" İddialarına İlişkin Basın Açıklaması, 16 July 2023, available here.
556 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.
557 Information provided by a stakeholder, June 2023.
558 Information provided by a stakeholder, April 2026.

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, metropoles and border cities do not usually figure among satellite cities. According to stakeholders, the concept of "satellite cities" was abandoned in 2023,[559] 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.

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 capacity[560].

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

559 Information provided by stakeholders, March – April 2024.
560 Information provided by stakeholders, March – April 2024.

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.[561] 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.[562]

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. Although no developments were reported regarding the provision of accommodation for unregistered individuals since November 2023,[563] this barrier persisted throughout 2025, continuing to obstruct access to registration, particularly given that a number of PDMMs require a rental contract as a precondition for registration.[564]

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.[565] In practice, applicants are required to report to PDMM offices every 15, 21, or 30 days and 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.[566]

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 2025, some people continued to have difficulties in accessing the online system still due to language barriers.[567] It was also reported that travel permits could be obtained online. In 2025, 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 authorisation.[568] In 2025, individuals were required to submit supporting documents in relation to travel permit requests through the system. Stakeholders reported that no uniform standard existed for determining which applications would be granted and which would be refused.[569]

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

561 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.
562 Information provided by a stakeholder May 2025.
563 Milliyet, Bakan *Yerlikaya açıkladı! İstanbul'da evini düzensiz göçmenlere kiraya veren ev sahiplerine ceza*, 02 November 2023, available here.
564 Information provided by a stakeholder, March 2026.
565 Article 71(1) LFIP.
566 Article 91(1)-(2) RFIP.
567 Information provided by a stakeholder, May 2026.
568 Information provided by a stakeholder, May 2026.
569 Information provided by a stakeholder, May 2026.

withdrawn their international protection application.[570] 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.

It is possible for applicants to request that PMM assign them to another province on grounds of family, health or other reasons.[571] 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, they 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. However, in order to avoid their application being deemed withdrawn, they must pursue this appeal in their newly assigned province.

Registration in another city, so non-compliance with the obligation to remain in the assigned province, is one of the most common reasons 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.[572]

Stakeholders reported that in 2025, similar to 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*) and issued the N-169 Restriction Code for "Failure to Comply with Administrative Obligations Determined by the Ministry" (Bakanlıkça Belirlenen İdari Yükümlülüklere Uymama). Although these fines were incorporated into the LFIP in 2019, they had not been widely enforced until recently.[573]

Since travelling outside the province of residence without authorisation triggers the deemed withdrawal of an international protection application, with the consequence that the applicant's claims are never substantively examined, affected individuals frequently request courts to assess the merits of their protection claims when challenging such decisions. Courts, however, consistently decline to do so. In one such case, the Eskişehir 1st Administrative Court dismissed the action brought by an Afghan national whose application had been deemed withdrawn on the grounds that he had been apprehended in Adana without a travel permit. The court found that the applicant had been duly notified of his obligations in his own language, that his departure from his province of residence without authorisation constituted a breach of those obligations, and that the deemed withdrawal decision was therefore lawful, without conducting any examination of the applicant's substantive protection claims, including his stated fear of the Taliban.[574]

570 Article 77(1)(ç) LFIP.
571 Article 110(5) RFIP.
572 Information provided by stakeholders, March – April 2024.
573 Information provided by a stakeholder, February 2026.
574 T.C. Eskişehir 1. İdare Mahkemesi 2024/1558 E., 2025/951 K., T: 30.05.2025.

B. Housing

1. Types of accommodation

Indicators: Types of Accommodation

1. Number of reception centres:[575] 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 address "accommodation, nutrition, health care, social and other needs" of international protection applicants and status holders.[576] 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).

Until 2025, the sole remaining operational Reception and Accommodation Centre was located in Yozgat province, with a capacity of only 100 places.[577] 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, this centre is 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, foreigners who have stayed the longest in the facility include a Syrian woman and her two children who were admitted in 2011.[578] In 2025, stakeholders reported that single men and, in some cases, families whose applications are received by PDMMs are referred to Nizip Temporary Accommodation Centre and required to remain there pursuant to Article 71 of the LFIP.[579]

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.

575 Both permanent and for first arrivals.
576 Article 95(2) LFIP.
577 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 December 2024, available here.
578 Ibid.
579 Information provided by multiple stakeholders, March and April 2026.

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, 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 of 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.[580] For these reasons, NGOs continue to advocate for the establishment of Reception and Accommodation Centres rather that further investment into 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 necessary examination. Even though children need to leave the shelters when they turn to 18, implementation might be flexible for specific cases considering specific vulnerabilities or for education reasons.

While the practice of not placing single mothers in TACs is a positive development, registration in provinces lacking relevant institutions or support networks may create significant difficulties in practice. In one case documented in 2025, a single mother with a six-month-old child was registered in Mersin, where no institution was available to provide assistance; support was ultimately provided by the Turkish Red Crescent. Provinces such as Manisa, Afyon, and Sinop have similarly been used for the registration of single mothers despite the absence of institutions capable of providing relevant support, an approach that appears designed to discourage relocation to these provinces. No practice exists of directing individuals with similar profiles to the same provinces in order to facilitate the development of informal support networks among applicants; where an individual subsequently relocates to another province, any such network is lost. Notwithstanding these obstacles, the large majority of individuals affected proceed with relocation regardless, in order to pursue registration, including in cases resulting in homelessness. Even where homelessness results, affected individuals are not admitted to a Violence Prevention and Monitoring Center (ŞÖNİM), as admission is conditioned on evidence of exposure to violence. While Turkish citizens facing housing difficulties may be admitted to ŞÖNİM on this basis, this possibility does not extend to foreign nationals.[581]

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.[582]

However, stakeholders reported that in 2025, a growing number of applicants were sleeping or considering sleeping in public spaces such as parks.[583]

580 Information provided by multiple stakeholders, May 2025.
581 Information provided by a stakeholder, May 2026.
582 Information provided by a stakeholder, May 2025, İBB, Geçici Barınma Merkezi, available here.
583 Information provided by a stakeholder, April 2026.

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 are fine and the centre works under capacity.[584]

"Persons with special needs" shall have priority access to free accommodation and other reception services provided in these facilities.[585] Reception services provided in the reception and accommodation centres may also be extended to international protection applicants and status holders residing outside the centres,[586] 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.

In practice, while individuals with special needs like LGBTI+ people are occasionally referred to Nizip TAC, the centre is predominantly used to accommodate single men, a category that does not constitute a special need under the relevant legal framework.[587]

Currently, significant portion of 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 in Türkiye 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. In 2025, the official maximum increase rate declined from 58% to 36%. 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. Refugees' fear of deportation makes them especially vulnerable to these threats.[588] 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

584 Human Rights and Equality Commission of Türkiye, 'Visit to Yozgat Reception and Accommodation Centre', 15 June 2022, available here.
585 Article 95(3) LFIP.
586 Article 95(4) LFIP.
587 Information provided by multiple stakeholders, March and April 2026.
588 Information shared by stakeholder, March – April 2024.

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 donors.[589] From 2025 onwards, most institutions providing rental assistance required applicants to submit a notarised and up-to-date rental contract. In practice, rental contracts in Türkiye are concluded for a one-year term and renew automatically thereafter; while the figure stated in the original contract remains unchanged, landlords and tenants typically agree informally on annual rent increases, with payments continuing on this basis. As a result, the amount stated in a contract concluded one or two years earlier may diverge significantly from the rent actually being paid. Drawing up a new contract reflecting the current rent entails additional cost, including recurring notarisation fees, and is generally disadvantageous to the tenant. Individuals holding such outdated contracts accordingly faced considerable difficulty meeting the documentation requirements for rental assistance. In addition, the Turkish Red Crescent in some cases required a copy of the landlord's identity document, with the recipient organisation offering to annotate the copy as being submitted solely for this purpose. Landlords, however, remained largely unwilling to provide a copy of their identity document to an unfamiliar party, and assistance was not delivered where landlords did not agree to cooperate, even where the Turkish Red Crescent itself was willing to proceed.[590]

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.[591]

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 conditions.[592] 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.[593] In **İstanbul**, an increasing number of Afghans have settled in Küçüksu and Yenimahalle[594] and Zeytinburnu.[595] In **Adana** and **Mersin,** they mostly live in rural areas under precarious conditions together with Syrians.[596] (see Content of Temporary Protection Housing).

A research[597] 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

589 Information provided by a stakeholder, May 2025.
590 Information provided by a stakeholder, May 2026.
591 Information provided by a stakeholder, May 2025.
592 Information shared by stakeholders, March- April 2024.
593 Birgün, 'Esenyurt'u 'yurt' edinen göçmenlerin öyküsü: Kimsesizler mezarlığına gömülmek istemiyoruz', 27 July 2022, available in Turkish here.
594 Information provided by a stakeholder, May 2023.
595 Information provided by a stakeholder, May 2023.
596 Information provided by a stakeholder, May 2023.
597 GAR, İstanbul İlçelerinde Kent ve Göç İlişkileri, Rapor no: 9, Nisan (April) 2024.

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.[598]

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?	☒ Yes ☐ No
❖ If yes, when do asylum seekers have access the labour market?	6 months
2. Does the law allow access to employment only following a labour market test?	☒ Yes ☐ No
3. Does the law only allow asylum seekers to work in specific sectors?	☒ Yes ☐ No
❖ If yes, specify which sectors:	
4. Does the law limit asylum seekers' employment to a maximum working time?	☐ Yes ☒ No
❖ If yes, specify the number of days per year	
5. Are there restrictions to accessing employment in practice?	☒ Yes ☐ No

Asylum seekers may apply for a work permit after 6 months following the lodging date of their international protection application.[599]

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.[600] 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.[601]

The following 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, I) tourist guide.[602]

Applicants must hold a valid identification document in order to apply,[603] meaning that 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.

598 Information provided by stakeholders, March – April 2024.
599 Article 89(4)(a) LFIP.
600 Article 89(4)(ç) LFIP.
601 Articles 6-7 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
602 Article 9/1 (c) of the Internal Workforce Law no. 6735, available here. For more information, available here.
603 Article 6(1)-(2) Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.

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.[604] The Ministry of Family and Social Services may introduce province limitations or quotas in these sectors.[605] 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.[606] In addition, applicants cannot be paid less than the minimum wage.[607]

In the Cohesion Strategy and National Action Plan (2018-2023),[608] 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 standards.[609] The number of work permits increased in 2024. In 2024, a total of 300,852 work permits were issued, including 87,361 for women. In 2025,105,096 citizens of Syria, 62,412 citizens of Turkmenistan, 18,686 citizens of Uzbekistan, 16,098 citizens of Indonesia,14,161 citizens of Russia, 12,881 citizens of Kyrgyzstan, , 11,177citizens of Afghanistan, , 12,991 citizens of Iran, obtained work permit, other top nationalities are Azerbaijan, India,Kazakhstan and Philippines. [610]

The Regulation also foresees the possibility for applicants to have access to vocational training schemes organised by the Turkish Job Agency (İŞKUR).[611] In practice, Public Education Centres and İŞKUR offer vocational courses to asylum seekers in many localities. In 2024, 11,779 participants were registered in short-term vocational skills development training courses over a six-month period, bringing the cumulative number of beneficiaries to 83,789, of which 51% were male. Additionally, data collected from three projects in the same period reported an increase of 8,584 new jobs created by enterprises established or expanded with EU refugee support, bringing the total to 15,004 jobs.[612]Between 2014 and 2024, a total of 3,999,831 foreign national trainees attended courses held in Public Education Centres, of whom 3,044,723 were Syrian nationals.[613]

Specific groups are concentrated in certain work areas. For instance, Afghans often work in shepherding, animal care agricultural production and textile especially in Istanbul.[614] The demand for foreign labour in the animal care sector is significant enough to warrant a dedicated work permit scheme. As of June 2025,

604 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.
605 Article 9(2) Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
606 Article 18(1) Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
607 Article 17 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
608 See PMM, Uyum Strateji Belgesi ve Ulusal Eylem Planı 2018-2023, available in Turkish here.
609 Resmî Gazete, Uluslararasi İşgücü Kanunu Uygulama Yönetmeliği, 2022, available in Turkish here.
610 ÇSGB, Çalışma İzin İstatistikleri, available here.
611 Article 22 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
612 European Commission, *Ninth Annual Report on the Facility for Refugees in Turkey*, 25 September 2025.
613 Hayat Boyu Öğrenme Genel Müdürlüğü 2024 Yılı Birim, *Faaliyet Raporu*, available here.
614 Information provided by stakeholders, March 2024 and May 2025.

the Ministry of Labour and Social Security began accepting work permit applications for foreign shepherds and animal carers to be employed in livestock enterprises covering cattle, dairy, and mixed farming operations.[615] Stakeholders further reported that, in 2025, Afghanistan nationals who have not yet obtained registration but wish to work as shepherds benefit from a more accessible registration pathway, though this is subject to stringent oversight to prevent abuse.[616] Highly educated international protection applicants or holders often face challenges in securing jobs that match their educational qualifications.[617]

In November 2025, the Ministry of Labour and Social Security published a procedural guide for work permit applications in domestic services, establishing a dedicated application pathway within the e-permit (e-izin) system through which employers may sponsor foreign nationals for caregiving roles covering childcare, elderly care, disability support, and patient accompaniment.[618] Against this backdrop, an exceptional administrative arrangement, the precise legal basis of which remains unclear, has been reported to be operating in practice, primarily benefiting Uzbek and Turkmen women who entered Türkiye prior to early 2025 without having been apprehended or accrued any administrative or judicial record, and who hold a valid passport. Under this arrangement, families seeking domestic caregivers may apply for a short-term tourist residence permit (3–6 months) on behalf of such individuals through the PMM, which has been reported to have manually enabled access to the relevant system. Eligibility is conditional upon the sponsoring family, both spouses, executing a notarised undertaking of thirteen standardised clauses, committing among other things to subsequently file a work permit application under the Ministry's framework should a residence permit be granted. Financial requirements attach to the sponsoring household: monthly income must exceed TRY 100,000, evidenced by payslips or three-to-six months of bank statements; where income derives from variable or non-salaried sources, account statements for the preceding six months must reflect aggregate inflows exceeding TRY 700,000. Neither the arrangement nor its implementing instruments formally designate any nationality, though it is understood to operate in practice predominantly for Uzbek and Turkmen nationals, a shift partly attributed to the withdrawal of Filipino workers from the Turkish domestic labour market due to exchange rate volatility.[619]

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, 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, and at the same time causes migrant labour to be viewed as a competitive threat by the unemployed locals.[620] With increased inspections of workplaces, employers are less willing to hire migrant workers, and workers without work permits are increasingly afraid to go to their workplaces due to fears of deportation.[621] Asylum seekers who work without a work permit are listed in the law among those against whom deportation decisions will be taken; the time limit to access the labour market and the reluctance of employers to apply for work permits for asylum seekers can 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

615 T.C. ÇSGB, Uluslararası İşgücü Genel Müdürlüğü, *Hayvancılık İşletmelerinde İstihdam Edilecek Çoban ve Hayvan Bakıcıları İçin Çalışma İzni Başvuru Süreçleri*, 12 June 2025, available here.

616 Information provided by a stakeholder, April 2026.

617 Informayion provided by stakeholders, March – April 2024.

618 T.C. ÇSGB, Uluslararası İşgücü Genel Müdürlüğü, *Ev hizmetlerinde istihdam edilecek yabancıların çalışma izni başvuru süreçleri*, 18 November 2025, available here.

619 Information provided by a stakeholder, April 2026.

620 Heinrich Böll Stiftung, *Göçmen Mahallelerinde Yaşam: Türkiye'de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı*, November 2023, available here.

621 Information provided by stakeholders, March-April 2024.

to go out to work. This was primarily because men were more frequently subjected to identity checks by authorities.[622]

In 2025, stakeholders reported that some employers required workers to cover their own social security contributions as a condition of formal employment, despite this obligation resting with the employer under Turkish law. Workers were effectively offered a choice between registered employment with unlawful deductions, or undeclared work at slightly above the minimum wage. In a number of cases, individuals chose to work without a permit, accepting informal employment in exchange for higher take-home pay.[623]

According to research conducted by Türk Kızılay,[624] 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.). Stakeholders reported that this trend continued in 2025.

The AHCSA report, drawing on a survey of 193 Afghan and Iranian migrants across multiple provinces, found that approximately 90 percent of respondents did not hold a work permit, with only 3 percent reporting an active permit. The vast majority of those in employment were engaged in informal, daily-wage or unstable work, with virtually no representation in the formal labour market among undocumented individuals or those whose cases had been rejected. Respondents reported being paid below the legally announced wage rates, with employers routinely declining to issue work contracts or provide social insurance. The study further noted that the absence of a work permit was identified as a principal driver of labour exploitation, contributing to a cycle of structural poverty and, ultimately, to the decision to leave Türkiye through irregular routes.[625]

Poor health and safety conditions at work are also a matter of concern. Workers' Health and Safety Watch (İşçi Sağlığı ve Güvenliği Meclisi) monitors workplace homicides, including those of refugees and migrants. In 2025, 91 refugee and migrant workers lost their lives in work-related incidents. These included 33 Syrians, 12 Afghans, 9 Turkmens, 8 Iranians, 7 Egyptians, 5 Azerbaijanis, 4 Iraqis, and 2 individuals each from Palestine, Kenya, Uzbekistan, Pakistan, and Ukraine, as well as one individual each from Indonesia, Moldova, and Russia. In the earthquake-affected reconstruction zones, 9 migrant workers lost their lives in work-related incidents in 2025.[626] An Afghanistan national, who was working in an illegal mine operating in Zonguldak's Kilimli district, was killed by his bosses.[627] Subsequently, it was revealed that one of his kidneys was missing; however, the maximum sentence imposed was only five years and eight months.[628] His wife

622 Information provided by multiple stakeholders, April and May 2025.
623 Information provided by a stakeholder, March 2026.
624 Turkish Red Crescent, *Türkiye - The Effects of Irregular Migration on Child Labor: The Situation of Migrant Children in Türkiye – 2024*, available here.
625 AHCSA, *Multi-Dimensional Assessment of the Situation of Afghan and Iranian Refugees in Turkey*, 29 November 2025, available here.
626 Isig Meclisi, *İş Cinayetlerine ve Çocuk İşçiliğine Karşı Mücadeleye… 2025 yılında en az 2105 işçi iş cinayetlerinde hayatını kaybetti*, 09 January 2026, available here.
627 Evrensel, *Yakılan işçi Nourtani'nin ailesi: Çalışan tek kişiydi şimdi bize ne olacak?*, 23 November 2023, available here.
628 X (Twitter), İstanbul Barosu Mülteci ve Göçmen Hakları Merkezi, 14 April 2025, available here; Bianet, *Vezir Mohammad Nourtani davasında "iş kazası" kararı onandı: Ödül gibi cezalar kesinleşti*, 13 October 2025, available here.

stated that the prolonged ordeal had taken a severe physical and psychological toll, describing deteriorating health and a pervasive sense of hopelessness among her children.[629]

In November 2025, an Adana court issued its judgment in the case of an 11-year-old Syrian child who had died in June 2024 after becoming trapped in a freight elevator at a textile workshop. The two convicted individuals, the building supervisor and an elevator maintenance official, received suspended sentences under a deferral of pronouncement of judgment (HAGB), meaning neither would serve time, while the workshop owners were heard only as witnesses and their responsibility as employers was not examined by the court.[630]

The Directorate General of International Labour announces updated administrative fines on an annual basis. In 2025, employers hiring foreigners without a work permit faced an administrative fine of TRY 81,683 per foreigner, while foreigners working without a dependent work permit were subject to a fine of TRY 32,654, and those working independently without a permit faced a fine of TRY 65,352. These amounts were further increased for 2026, applying a revaluation rate of 25.49%, bringing the corresponding fines to TRY 102,503, TRY 40,977, and TRY 82,010 respectively.[631] In practice, while administrative fines are provided for under the applicable legislation, the more immediate risk for foreigners working without a permit is placement in a removal centre, as unauthorised work constitutes a ground for the issuance of a deportation order. 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.[632]

MUDEM runs a project aimed at improving the working conditions of migrant workers, with a particular focus on those employed in the textile and garment sector, providing social, legal and economic advisory services, conducting workplace visits to assess needs, and supporting workers in accessing their basic labour rights, obtaining temporary protection status and securing work permits.[633]

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.[634]

In April 2026, the ILO Office for Türkiye and UNHCR Türkiye formalised their cooperation through a Letter of Understanding, establishing a framework for joint action on labour market integration, formal employment and economic inclusion of refugees and host communities. The agreement identifies several priority areas, including support for work permit arrangements, skills mapping, labour market data collection, access to finance, and technical and vocational training aligned with market needs.[635]

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629 İlketv, *Bedeni yakılan Afgan işçinin eşi Qamer Nourtani: Saçlarım beyazladı, döküldü; baş etmeye çalışıyoruz*, 08 May 2026, available here.

630 Isig Meclisi, *Tekstil atölyesinde hayatını kaybeden çocuk işçi Ahmet Haskiro için adalet yok*, 06 November 2025, available here.

631 T.C., ÇSGB, *Uluslararası İş Gücü Genel Müdürlüğü, Çalışma İzni Olmaksızın Çalışan/Çalıştırılan Yabancılara İlişkin İdari Para Cezaları*, available here.

632 Information provided by a stakeholder, May 2025.

633 MUDEM, *Göçmen İşçilerin Çalışma Şartlarını İyileştirme Projesi*, available here.

634 İBB, *Göçmen İşçi Sağlığı Merkezi*, available here.

635 UNHCR Türkiye, *ILO and UNHCR formalize cooperation in Türkiye to advance decent work and economic inclusion*, 06 April 2026, available here.

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

Access to education and enrolling into schools

International protection applicants and their family members shall have access to elementary and secondary education services in Türkiye.[636]

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.[637] 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'.[638]

For a parent to be able to register their child in 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.[639] However, the Ministry of National Education instructs public schools to facilitate children'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.[640] 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". In 2024 and 2025 however, in some cities, there is a tendency not to enrol these children in schools to encourage families to register with authorities.[641] 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.

636 Article 89(1) LFIP.
637 Law No 222 on Primary Education and Training.
638 Law No 1738 Basic Law on National Education.
639 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.
640 Information shared by stakeholders, March-April 2024.
641 Information shared by a stakeholder, March 2024.

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.

Under the Child Protection Law (Law No. 5395), courts may issue a range of protective measures in respect of children, including an educational measure (*eğitim tedbiri*), which enables a judge to order a child's enrolment in an educational institution on a day or residential basis, their placement in a vocational training course, or their placement with a skilled tradesperson or in a public or private sector workplace for the purposes of acquiring a profession or trade.[642] In practice, lawyers have sought to invoke this measure in cases where children are unable to access formal education due to their parents' legal status, using the judicial protection framework as an alternative pathway to enrolment where administrative channels have been exhausted.

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 migration directorates confirming their legal status in Türkiye, including approved identification details. The notification explicitly emphasised that applications from foreign nationals who do not present proper identification will not be considered for protective measures.[643]

Where the child has previous educational experiences prior to arrival to Türkiye, they undergo an equivalence assessment by Provincial Education Directorate to determine what grade would be appropriate for them to enrol in. 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 for their ages rather than their levels and therefore struggle to catch up.[644] 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.[645]

Cohesion strategy and national plan

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;

642 Child Protection Law (Law No: 5395) Art. 5/1(b).
643 Information provided by a stakeholder, May 2025.
644 Information shared by a stakeholder, March 2024.
645 Information provided by a stakeholder, May 2025.

- 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.

Special needs

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 measures 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 areas.[646]

Statistics

As of September, 2025, 821,545(79.58%) of the entire foreign population of school age have been included in the education system. Of these students there are 32,878 (%33,88 of the entire population) foreign students in kindergarten, 373,232 (%98 of the entire population) in primary school, 277,614(%98 of the entire population) in secondary school, and 138,821 (%51 of the entire population) in high school.[647]

School-age foreign nationals demonstrate relatively high attendance rates at the primary and secondary levels, covering the 6–13 age group. However, enrolment rates decline significantly at the high school level, covering the 13–17 age group, a pattern attributed in part to economic pressures within migrant households, where older children are expected to contribute to family income through employment.[648]

Main obstacles in practice

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.[649] There are schools where separate classes are created for migrant children.[650] Although public schools are free, auxiliary costs such as notebooks, stationary and school uniforms, and transportation cost present a financial burden on parents. School

646 *Ortak 3RP Koruma Sektörü Çalıştay Raporu*, August 2023, available here.
647 T.C. Milli Eğitim Bakanlığı Hayat Boyu Öğrenme Genel Müdürlüğü, *İzleme ve Değerlendirme Raporu 2025*, available here.
648 Information provided by a stakeholder, April 2026.
649 Information provided by stakeholders, March-April 2024.
650 Information provided by a stakeholder, May 2023.

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.[651]

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, tailored for them, are not universally available around Türkiye.

Language remains a major barrier to access to services, employment, and social cohesion. Adult refugee women are considerably less likely to speak Turkish or have gotten any formal education than men.[652] Free Turkish courses are provided by Public Education Centres. 23,846 (8,589 male, 15,257 female) foreign nationals accessed to Turkish language courses in 2025 16.152 (7.013 male 9.139 female) foreign nationals accessed to Turkish literacy courses in 2025[653]. Turkish Red Crescent Community Centres previously provided Turkish language courses for migrants; however, no publicly available data has been reported since 2023.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.[654]

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.[655] In **Istanbul**, 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 Istanbul, only one school of this type exists.[656] According to stakeholders in 2025, enrolment of children without Turkish language proficiency in intermediate grades has become increasingly difficult.[657]

Higher education

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

651 Information provided by a stakeholder, April 2025.
652 Inter-Agency Coordination Türkiye, IAPNA 6, January 2023, available here.
653 Hayat Boyu Öğrenme Genel Müdürlüğü, *İzleme ve Değerlendirme Raporu 2025*, available here.
654 Information provided by a stakeholder, May 2025.
655 STGM, 'Aynı Dili Konuşalım Projesi Ücretsiz Online Türkçe Kursları Başlıyor', 31 August 2022, available in Turkish here.
656 Information provided by a stakeholder, April 2023.
657 Information provided by a stakeholder, May 2026.

students and blue cardholders.[658] 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 students.[659] In 2025, stakeholders observed that this protocol eased the administrative burden of obtaining a student residence permit, an option increasingly favoured by individuals given that the Presidency of Migration Management (PMM) has not been particularly inclined to grant short-term residence permits. It was further reported that registration for associate degree (two-year, *ön lisans*) programmes is considerably easier to obtain than registration for bachelor's degree (four-year, *lisans*) programmes.[660] As of 2025, state universities no longer administer their own separate entrance examinations for international student admission; admission is instead based on the centralised TR-YÖS examination or on high-school leaving qualifications recognised by the Council of Higher Education (YÖK), such as the IB, Abitur, or GCE-AL.[661] Foundation (private) universities remain free to set their own admission criteria (TR-YÖS, international examinations, or exam-free admission based on diploma grades).

According to data from the Higher Education Information Management System (YÖKSİS), 337,119 international students were enrolled in Turkish higher education institutions in the 2024/2025 academic year, comprising 190,062 male and 147,057 female students (43.6% female, up from 42.3% the previous year). This represented a mere 0.2% increase compared to 2024 – a sharp slowdown from the 11.5% growth recorded the year before, and far short of the 6.1% annual growth target set out in the Council of Higher Education's (YÖK) Internationalisation Strategy Document 2024-2028. By level of study, 17.5% of international students were enrolled in associate degree programmes, 69.3% in bachelor's programmes, 9.9% in master's programmes, and 3.3% in doctoral programmes. State universities hosted 205,491 international students (down from 226,141 in 2024), while foundation (private) universities hosted 131,628 (up from 110,225), reflecting a continuing shift of international enrolment toward the foundation university sector, whose share rose from 33% to 39% year-on-year. Syrian nationals remained by far the largest group of international students, numbering 54,794, followed by Azerbaijani (42,969), Turkmen (37,542), Iranian (31,486), Kazakh (12,893), Iraqi (11,556), Egyptian (10,900), Uzbek (8,925), Afghan (8,309), Somali (7,123), Yemeni (6,682), Jordanian (6,055), Bulgarian (5,697), Russian (5,393), Palestinian (5,334), Sudanese (5,333), and Indonesian (5,140) nationals, with 70,988 students from other countries. Istanbul hosted the largest concentration of international students (136,404, or roughly two in five nationally), followed by Ankara, Eskişehir, Erzurum, and Karabük.[662]

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.[663] Accordingly, 713 students received DAFI scholarships in 2025.[664] Additionally, the ICMPD's EU Scholarships and YTB's Türkiye Scholarships offer financial support based on various criteria, including academic performance and location.[665] UNHCR's financial assistance for ex-minors, which focused on continuation to education including language courses, vocational or skill courses,[666] stopped in May 2025 and still inactive as of May 2026

658 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.
659 *Başkanlığımız ile YÖK Arasında Uluslararası Öğrencilerin İkamet İzinlerine İlişkin İşbirliği Protokolü İmzalandı* (15 November 2023), available here.
660 Information provided by a stakeholder, July 2026.
661 YÖK, *Uluslararası İlişkiler Dairesi Başkanlığı*, 12 February 2025, available here.
662 Eğitim-Bir-Sen, *Yükseköğretime Bakış İzleme ve Değerlendirme Raporu*, 2025, available here.
663 UNHCR, 'Admission to University', last accessed on 14 July 2024, available here.
664 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.
665 EU Scholarhips, available here.
666 Information provided by a stakeholder, June 2024.

Vocational courses

The Turkish Employment Agency (İŞKUR) runs several vocational courses.[667] Vocational courses are offered by public education centres. In 2025, UNHCR supported more than 2,000 refugees with semester-based higher education cash grants to continue their studies. Academic counselling, online learning initiatives implemented in cooperation with YTB, Turkish language courses, and vocational training delivered through Public Education Centres and refugee-led organizations further enhanced refugees' academic readiness and future employability.[668] 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 as of May 2026 and 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.[669] Also, individuals can participate vocational courses of MESEM, the Center for Vocational Courses.[670] Lastly, there are civil society organisations that provide free skills training, hobby, and vocational courses under the supervision of the Ministry of National Education.[671] According to stakeholders, attendance at courses offered under the ISDEP 2 Project was low in 2025.[672]

The main barrier to access vocational education is lack of language proficiency.

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.[673]

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

667 İŞKUR, available here.
668 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.
669 Information provided by a stakeholder, May 2025.
670 T.C. Milli Eğitim Bakanlığı, Mesleki ve Teknik Eğitim Genel Müdürlüğü, Mesleki Eğitim Merkezleri, available here.
671 RRT, *Information Portal for Refugees in Turkey*, available here.
672 Information provided by a stakeholder, May 2026
673 Law No 5510 on Social Security and General Health Insurance lays down the scope and modalities of Türkiye's general health insurance scheme.

health insurance premiums, they 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, per Article 89(3).

Since 2019, 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 regarding whom a negative status decision was issued, the PMM may proceed with 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.[674]

Assessment criteria are, therefore, no longer applied to non-Syrians apart from vulnerable groups after first year. 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. Moreover, disclosing a pre-existing diagnosis carries the risk of adversely affecting the applicant's status determination, on the grounds that they may be considered to have entered Türkiye for the purpose of accessing healthcare rather than seeking protection. [675]

Usually, the patient and family members of beneficiaries of international protection who need treatment have an identity card during the court application process. Nevertheless, once the case is rejected, the health service is terminated, forcing people to access health services in the private sector.[676] 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.[677]

In general, PDMMs require more than 40% disability to consider the applicants as vulnerable. Individuals under 18 and over 65 are already recognized as persons with special needs under the LFIP. PDMMs are also meant to treat them as such in practice, but no harmonized approach exists across provinces, and even applicants with similar conditions are treated inconsistently, as observed in 2025.[678]

674 Infromation provided by stakeholders, March – April 2026.
675 Information provided by a stakeholder, March 2026.
676 Information provided by a stakeholder, April 2022 and May 2023.
677 Information provided by a stakeholder, April 2023.
678 Information provided by a stakeholder, December 2025

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 also provide 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 developed primary health care services. Under the project, 179 Migrant Health Centres operated in 32 provinces as of September 2025, when the third phase of the project (SIHHAT III) was launched.[679] Reinforced centres among these provide additional specialist services — including internal medicine, paediatrics, gynaecology, oral health, and psychosocial support, as well as laboratory and radiology services, in localities with Syrian populations exceeding 20,000. Ten Community Mental Health Centres have additionally been established across nine provinces, including Istanbul, Izmir, Bursa, Adana, Hatay, Şanlıurfa, Mardin, Gaziantep, and Kilis.[680] The SIHHAT project mainly focuses on reproductive health, mental health and psychosocial support, immunisation, mobile health services, cancer screening, and health literacy training. Like 2024, in 2025, there were 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 circular dated 21 May 2024 was circulated to all health institutions, including MHCs, instructing 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 continued regardless of identification status.[681] In line with this circular, in 2025 MHCs stopped accepting applications from the unregistered ones. In 2025, Foreign Nationals Policlinics (Yabancı Uyruklular Polikliniği — YUP) started to operate as the primary point of access to first-level healthcare services for foreign nationals. Established within Community Health Centres in districts with high concentrations of foreign nationals, YUPs are intended to provide preventive health services and communicable disease prevention with the support of language-capable personnel. As of 2026, YUPs function as the designated healthcare access point for non-Syrians, replacing the role previously assigned to MHCs for this population group. However, stakeholders reported that individuals with registration problems or those who are unregistered continued to hesitate to approach YUPs in 2026, fearing that doing so might expose their irregular status.[682]

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

679 SIHHAT, *Türkiye'de Göçmen Sağlığı Hizmetlerinin Desteklenmesi Projesi* (IPA-III/2023/433-160), available here.
680 SIHHAT, *Sağlık Hizmetleri*, 08 May 2025, available here.
681 Information provided by a stakeholder May 2025.
682 T.C. Sağlık Bakanlığı, *Yabancı Uyruklular Polikliniği*, available here.

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).[683] 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. In 2025, family health centres ceased accepting applications from foreign nationals and began charging fees for services.[684]

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.[685] That said, the free health care coverage of international protection applicants would also extend to any mental health treatment needs of applicants arising from 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, they 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. The Turkish Red Crescent Community Centres provide mental health and psychosocial support services across Türkiye. As listed on the organisation's website, 16 centres are currently operational in 15 cities: Adana, Ankara, Bursa, Gaziantep, Hatay, İzmir, Kahramanmaraş, Kayseri, Kilis, Kocaeli, Konya, Mardin, Mersin, Şanlıurfa, and İstanbul, where two centres operate on the European and Anatolian sides respectively. The teams consist of psychiatrists, clinical psychologists, child development specialists, psychiatric nurses and translators.[686]

683 Directive No 28597, 24 March 2013.
684 Information provided by a stakeholder, May 2026
685 Article 113(1) RFIP.
686 Toplum Merkezi, Community Centers, available here.

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.

As of May 2026, no updated version of this plan had been published. According to stakeholders, health access and health assessments occupy a limited place in Türkiye's current migration policy agenda, with the observable direction of policy being one of restricting rather than expanding access to healthcare for migrants, driven primarily by economic considerations.[687]

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.

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.

687 Information provided by multiple stakeholders, March, April and May 2026.

In 2025, stakeholders reported a further deterioration in GHI access than 2024. The deactivation of GHI was applied broadly across all applicants regardless of vulnerability, with PDMM authorities requesting updated medical reports from all individuals as a precondition for reactivation. In practice, income assessment criteria applied to international protection applicants and status holders are reported to be more stringent than those applied to Turkish citizens, and the PDMMs do not maintain transparency regarding the applicable thresholds. As a result, individuals who fall within the first year of registration or who are classified as persons with special needs under Article 3(1)(l) of Law No. 6458 (LFIP) are denied GHI activation on the grounds that their income is deemed sufficient. Where activation does occur, it is generally limited to individuals with disabilities of 40 percent or above, elderly persons, children, and those whose conditions appear on the Annex-4D list of medications exempt from patient contribution fees under SGK regulations. Stakeholders observed in July 2025 that Istanbul PDMM frequently references the Annex-4D list as the operative criterion for GHI activation, without giving due consideration to the broader definition of persons with special needs under LFIP. Cases were also reported in which an applicant's diagnosis code appeared on the Annex-4D list yet the individual was still referred to SGK rather than having their GHI activated directly.[688] 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.[689] Stakeholders reported that even individuals with severe disabilities, including hearing loss, were being denied GHI activation. This was illustrated in November 2025 by the case of an Afghan family in which three children had hearing impairments and multiple family members suffered from chronic health conditions. Despite the submission of ÇÖZGER reports (report on special needs for children) and petition support for the children's GHI activation, the Istanbul PDMM declined to reactivate their coverage.[690]

Where GHI activation is sought on the basis of an Annex-4D diagnosis, individuals are required to submit a QR-coded discharge summary (epikriz) from a hospital. In practice, hospitals do not issue such reports to patients who have not been admitted as inpatients, and efforts by legal practitioners to resolve this through hospital administration have yielded inconsistent results, leaving many individuals unable to obtain the required documentation. Stakeholders noted that in 2025, individuals whose GHI is not active are billed under the health tourism tariff when presenting at hospitals, which entails significantly higher costs. Where individuals are aware of this and seek to challenge the charge, legal practitioners and civil society organisations have been able to intervene; however, many individuals are unaware of the applicable rules and incur substantial expenses. Fear of financial liability has in turn been observed to deter individuals from seeking hospital care when ill. Stakeholders reported that foreign nationals are sometimes processed and discharged quickly upon presenting at emergency departments, and that calling the 184-health line to register a complaint has not produced effective results.

As of 2026, access to GHI deteriorated further. Activation is now conditioned not only on Annex-4D diagnosis but also on a financial means assessment, with authorities directing applicants to obtain a work permit on the basis that employment would confer SGK coverage. SGK coverage itself, however, presents further obstacles: where an individual's diagnosis predates their SGK enrolment, SGK may decline to cover treatment for that condition, particularly where GHI through the migration authority was not active during the intervening period. In one documented case in 2026, an MS patient with a continuous insurance history was asked to submit six months of bank statements for both herself and her spouse; the application was subsequently rejected by the relevant PDMM on grounds of sufficient financial means, a determination that, given prevailing rental costs in Istanbul, raises serious questions about the income thresholds being applied.

688 Information provided by multiple stakeholders, January and February 2026.
689 Information provided by multiple stakeholders April, May 2025.
690 Information provided by a stakeholder, December 2025.

Some stakeholders expressed concern that, the widespread deactivation of GHI is being used as a tool to pressure individuals into leaving Türkiye. A stakeholder reported in January 2025 that PDMM authorities had deactivated the GHI of all applicants irrespective of vulnerability status and requested updated medical reports from all of them, including an Iranian national with conditional refugee status diagnosed with multiple sclerosis. In the same period, the parents of a child with a permanent disability classification (ÇÖZGER) were informed that a new disability report was required to reactivate the child's GHI; when they attended hospital to obtain one, medical staff confirmed that a report marked "permanent" cannot be renewed and that they were unable to issue a new one regardless.

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 emphasised that applications lacking proper identification would not be considered for protective measures. Stakeholders emphasised that these exceptions did not affect access to vaccinations, and even unregistered infants were able to receive mandatory vaccinations in 2024.[691] In August 2025, two Afghan families sought ÇÖZGER reports for their children at state hospitals in Istanbul; hospital authorities refused to issue the reports on the grounds that foreign nationals must be referred by an official institution, a requirement that neither Migrant Health Centres nor Social Services Centres were able to fulfil. It subsequently emerged that the General Directorate of Public Hospitals had circulated a document to hospitals on 30 September 2024 setting out this practice, of which hospital social services units themselves reported being unaware.[692]

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 (udocumented), 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.[693] In 2025, the number of babies born to foreign women were as follows: Iraq 2,141 babies, Uzbekistan 1,987 babies, Afghanistan 1,939 babies, Turkmenistan 1,827 babies, Azerbaijan 1,629 babies,, Morocco 1,582 babies, , Russia 1,050 babies, .[694] The compounding effect of GHI deactivation and financial hardship is illustrated by a case documented in December 2025, in which an Iraqi family's GHI was terminated following the rejection of their international protection application. Although a health protection measure had been granted in June 2025 enabling the child's treatment to resume, the court order restricted care to a single designated hospital. The child required blood transfusions up to three times per month, and the family, dependent on a single income from casual employment, was regularly unable to meet transportation costs. In October 2025, an Iranian national in Balıkesir with an active residence permit valid until September 2026 was denied GHI reactivation by the local PDMM despite presenting a medical report indicating the need for urgent spinal surgery; authorities stated that reactivation would only be considered if her mobility

691 Information provided by multiple stakeholders, February and May 2025.
692 Information provided by a stakeholder, February 2026.
693 Information provided by stakeholders, March – April 2024.
694 TÜİK, Doğum İstatistikleri, 2025, available here.

deteriorated further. Her diagnosis code was not listed under Annex-4D, which stakeholders identified as the operative barrier.

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 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)[695].

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 solutions.[696] 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.[697] 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.[698] In 2025, cases were documented in which individuals were apprehended and placed in administrative detention solely on the basis of their HIV-positive status, with the stated ground for detention being a threat to public health.[699]

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 authorities.[700] 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.[701] 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.[702]

The language barrier remains one of the main problems encountered by asylum seekers in need of access to health care services.[703] 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.[704] NGOs in some locations also offer limited services to accompany particularly vulnerable asylum seekers to hospitals.

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.[705] A thematic issue concerning Afghan nationals is the high number of Afghan children

695 DDD, *Provision of health protection and resilience of at-risk Syrians and undocumented migrants ın Turkey | Dünya Doktorlarn*, available here.
696 Information provided by stakeholders, March – April 2024.
697 Information provided by a stakeholder, April 2023.
698 Information provided by a stakeholder, June 2023.
699 Information provided by a stakeholder, May 2026.
700 Information provided by stakeholder, March – April 2024.
701 Information provided by a stakeholder, May 2023 & Information provided by stakeholder, March – April 2024.
702 Infomration provided by a stakeholder, March 2024.
703 Information provided by stakeholders, May-June 2023.
704 Information provided by astakeholder, May 2023.
705 Information provided by a stakeholder, May 2023.

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 specialised treatment is available.[706]

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'.[707]

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

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.[708]

Unaccompanied minors can benefit from shelter assistance provided by the Ministry of Family and Social Services until they turn 18.[709] The rooms might be shared or private, as conditions vary. These shelters ensure that all basic needs are met, 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 remote 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 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.[710] 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 them obtain one. If the child goes directly to a PDMM, they will not obtain an ID card as they 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.

706 Information provided by a stakeholder, May 2025.
707 Article 3(1)(l) LFIP.
708 Law No 7196 amending several acts, 6 December 2019, in Turkish here.
709 *Information Portal for Refugees in Turkey, Rights and Procedures for Unaccompanied Minors*, available here.
710 Ulusal Koruma Çalışma Grubu, *Ortak 3RP Koruma Sektörü Çalıştayı*, 2-3 August 2023.

There is no clarity in Child Protection Law and its regulation. The law concerning exit procedures for refugee children staying in dormitories remained unclear. The procedure for placing children in residential care facilities has also been identified as problematic, as placements are carried out by the juvenile police, a practice reported to cause significant trauma. Police officers often lack 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 for family reunification have been 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.[711] 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.[712] 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.[713]

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 paper,[714] while other unaccompanied children aged 12-13 were determined to be relatives of these older children and were released from childcare institutions.[715]

According to UNHCR's report, published in May 2026, 91.93% of unaccompanied and separated children among the refugee and asylum-seeker population were placed in an alternative care arrangement in 2025, exceeding both the 2025 target (82.50%) and the previous year's baseline (78.94%). Protection Desks operated with UNHCR's technical support referred 10,587 child-at-risk cases to specialised services over the course of the year, out of more than 20,000 individual child assessments conducted to identify protection risks. UNHCR also reported engaging with the PMM and relevant line ministries on strengthening safeguards in family reunification cases involving Syrian UASC wishing to return to Syria.[716]

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.[717] In 2025, in total there are 151 women's

711 Information provided by various stakeholders, May-June 2023.
712 Information provided by a stakeholder, May 2023.
713 Information provided by various stakeholders, June 2023.
714 Information provided by stakeholders, March – April 2024.
715 Information provided by various stakeholders, May 2023.
716 UNHCR, *Annual Results Report 2025 Türkiye*, available here.
717 Ministry of Family, Labour and Social Services, *Şiddet Önleme ve İzleme Merkezi*, available in Turkish here.

shelters with a capacity of 3,683;[718] 112 shelters affiliated with the Ministry in 81 provinces provided services with a capacity of 2,819; 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 3 women's shelters affiliated with PMM with a capacity of 80. The number of existing women's shelters, managed by the municipalities and their capacities are not sufficient.[719]

There are two dedicated shelters for survivors of human trafficking operated by the PMM: one in Kırıkkale, with a capacity to accommodate 20 victims, and another in Ankara, with a capacity for 30 victims.[720] The Third National Action Plan to Combat Trafficking in Human Beings (2025-2030), adopted at the 15th Migration Board on 29 January 2025, foresees expanding shelter capacity further and specialising services to meet the differing profiles and needs of victims.[721] In 2024, the Turkish government allocated 1,517,200 TRY ($42,900) to international organisations for trafficking-related projects, up from 896,640 TRY ($25,350) in 2023, but again provided no funding to domestic NGOs. PMM allocated 937,500 TRY to the Ankara shelter and 579,960 TRY to the Kırıkkale shelter to cover operational costs, vehicles, food, and office and cleaning supplies. Despite available support services — including shelter, medical care, and financial assistance — experts continued to report a lack of capacity to provide specialised support tailored to different victim profiles, along with delays in accessing healthcare and residence permits. Observers also pointed to the continued absence of a digital case management system, while GRETA and civil society actors flagged that the government's victim protection efforts remained insufficiently inclusive of NGOs, including in terms of funding. The government provided support services to 53 victims in 2024, a sharp decline from 299 victims in 2023, and the Coordination Board for Combating Trafficking — the body formally tasked with interagency coordination — did not meet in either 2024 or 2023.[722]

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 violence.[723] 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 adopt gender sensitivity is that divorced or widowed women must prove that they are divorced or widowed to receive the Türk Kızılay Card.

In 2025, 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

718 T.C. Aile ve Sosyal Hizmetler Bakanlığı, *2024 Faaliyet Raporu*, available here.
719 Information provided by stakeholders, March – April 2024.
720 U.S. Department of State, *2025 Trafficking in Persons Report: Turkey (Türkiye)*, available here
721 PMM, National Action Plan to Combat Trafficking in Human Beings 2025-2030 (pp. 76-77); PMM, "Action Plan Against Human Trafficking is in Effect," 31 July 2025, available here.
722 U.S. Department of State, *2025 Trafficking in Persons Report: Turkey (Türkiye),* available here.
723 GAR, *Çoklu Kıskaç Altında: Göçmen ve Mülteci Kadınların Sorunları Üzerine Güncel Bir Değerlendirme, GAR-RAPOR NO:10*, available here.

risks before filing a report, despite not being the competent authority to initiate a transfer to a Removal Center.[724]

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 rights[725]. 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.[726] 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 market[727]. 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.[728]

In 2025, stakeholders reported a pattern of systemic obstacles facing survivors of domestic violence seeking to file complaints with law enforcement. Where a woman approached police alone, reports were frequently either not processed or used as a pretext to contact the spouse, with officers in some cases asking both parties whether they wished to file complaints against each other and warning that both could be taken to an RC if they did. Zeytinburnu and Esenyurt were identified as the districts with the worst practices in this regard, attributed to the high concentration of foreign nationals in those areas; police stations in districts with smaller foreign national populations were reported to behave more appropriately. Women's shelters (ŞÖNİM) require referral through law enforcement, meaning that unregistered individuals cannot be referred to shelters through that channel. Where there is no immediate threat to life, practitioners reported that resolving the individual's registration status takes precedence over reporting the incident to law enforcement. Even where a registered individual seeks to file a complaint, officers have been reported to use deterrent language, including threats that children would be taken into state care if the survivor moved to a shelter, and to record complaints as received without actually taking them, providing no copy of the statement to the complainant. The absence of a statement copy means that the complainant has no record of the report, and the absence of any trace on E-Devlet systems makes it extremely difficult for individuals to identify that their complaint was not properly recorded without the assistance of a civil society organisation or legal practitioner. Stakeholders noted that this pattern has become significantly more prevalent in provinces where civil society organisations have closed offices due to funding cuts, and that legal accompaniment and close follow-up are essential for ensuring that such cases reach the relevant judicial authorities.

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 Line[729] 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.

724 Information provided by multiple stakeholders April and May 2025.
725 Information provided by stakeholders, March – April 2024.
726 Information provided by various stakeholders, May-June 2023.
727 Information provided by stakeholders, March – April 2024.
728 Ulusal Koruma Çalışma Grubu, *Ortak 3RP Koruma Sektörü Çalıştayı*, 2-3 August 2023 & Information provided by stakeholders, March – April 2024.
729 Kadın Destek Hattı, available here.

3. Reception of LGBTQI+ persons

LGBTQI+ persons are not mentioned as a category of "persons with special needs" in the LFIP.

In 2024 and 2025, 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 2024, referrals increasingly included provinces like Afyonkarahisar and Uşak, where the refugee population is smaller, and where the local population is more conservative compared to the cities they were referred to in the past. In 2025, Kastamonu, Elazığ, Kocaeli, and Sakarya were among the provinces commonly used as referral destinations. A practice was observed whereby individuals were first directed to Nizip TAC pending the determination of their application, and upon being granted international protection status, were subsequently referred to one of these provinces.Although single men are also referred to TACs, stakeholders reported that the situation of LGBTIQ+ individuals has been taken into account, and that they have been accommodated in single rooms rather than being placed together with men. . LGBTIQ+ individuals face threats and risks due to a lack of supportive NGOs in smaller provinces.[730] They face challenges when they request to change cities, as the risk of attack is not considered as a valid reason to be relocated. There were some cases where they were referred to other provinces after physical attacks.[731]

In 2025, discrimination against refugee LGBTQI+ individualscontinued, creating serious obstacles to accessing housing, healthcare, and employment. Access to safe and dignified housing is particularly limited for transgender persons. 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.[732]

In 2024, a Syrian transgender woman living with HIV was exposed on social media for receiving medical support. She was soon detained, made to sign a voluntary return form, and deported the same day. She was later confirmed killed in Syria. Stakeholders interpreted the case as an example of authorities rapidly acting to avoid public backlash, particularly given stigma around gender identity and HIV treatment.[733] Following this incident, in 2025, stakeholders reported a pattern of apprehensions targeting individuals on the sole basis of their HIV-positive status becoming known to the authorities, with administrative detention orders issued on public health grounds.[734]

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

730 Information provided by stakeholders, May 2026.
731 Information provided by a stakeholder, March 2024.
732 Information provided by a stakeholder, June 2023.
733 KAOS GL, *HIV statüsü ifşa edilen Suriyeli trans kadına "gönüllü geri dönüş formu" bir saatte imzalatıldı, itiraz süresi beklenmeden gönderildi*, 12 August 2024, available here.
734 Information provided by a stakeholder, May 2026

cities. This requires frequent travel, leading to significant travel and accommodation expenses,[735] 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.[736] In public hospitals, the GHI covers the cost of certain surgeries, such as vaginoplasty and testicle removal, but applicants must pay for the remaining cost.[737] In May 2025, the United Nations High Commissioner for Refugees' monthly financial assistance of 2,300 TRY for transgender and intersex refugees stopped and as of May 2026 it has not been provided[738]

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. 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 2025, stakeholders reported that individuals seeking gender reassignment faced significant delays, both in obtaining court decisions and in securing hospital appointments, rendering the process prohibitively lengthy in practice.[739]

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.[740] They prefer to contact Positive Living Association's service units in Istanbul, Eskisehir, Mersin, Denizli, and Yalova or Red Umbrella Sexual Health and Human Rights Association's service unit in Ankara.[741] As of mid-2026, this trend persists, albeit with a reduced number of NGOs as a result of funding cuts.[742]

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.[743] For instance, transgender residents of **Denizli** are required to obtain a travel permit to attend the hospital regularly in Izmir.[744] Medical records from hospitals need to be used to obtain travel permit via E-Devlet (an online platform to access public services).[745] 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.[746] 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.

735 Information provided by a stakeholder, March 2024.
736 Information provided by a stakeholder, March 2024.
737 Information provided by a stakeholder, June 2023.
738 Information provided by a stakeholder, May 2026.
739 Information provided by a stakeholder, April 2026.
740 Information provided by a stakeholder, June 2023.
741 Information provided by a stakeholder, May 2026.
742 Information provided by multiple stakeholders May 2026.
743 Information provided by a stakeholder, March 2024.
744 Information provided by a stakeholder, June 2023.
745 Information provided by a stakeholder, June 2023.
746 Information provided by a stakeholder, March – April 2024.

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, international protection holders can continue receiving the necessary medical services one year after registering. Few institutions deal with the needs of this group such as UNFPAin **İstanbul**, **Yalova, Denizli, Mersin, Eskisehir** and Red Umbrella Sexual Health and Human Rights Association in **Ankara**. In 2025, although the legislation provides for automatic GHI activation during the first year of registration, this was not being implemented for HIV-positive individuals. Where an individual was able to access an NGO, applications were submitted by petition, following which documentary evidence of the chronic condition was required. Obtaining the necessary medical report entailed a fee ranging from approximately 2,000 to 4,000 Turkish liras depending on the hospital, and while activation was achieved in some cases involving HIV-positive individuals, the process remained onerous. A further obstacle arose in the context of international protection applications: where an applicant disclosed their HIV-positive status during the procedure, they were required to obtain documentation from a hospital confirming this before the application could be registered, and where such documentation could not be produced, including due to the associated cost of testing, individuals were unable to access the international protection procedure. Stakeholders identified access to healthcare and access to registration as compounding and interconnected obstacles for people living with HIV.

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 Associationhave 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.[747] As of 2025, this support does not continues because of PRM funding cut.[748] 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.[749]

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.

747 Information provided by a stakeholder, June 2023.
748 Information provided by a stakeholder May 2025.
749 Information provided by a stakeholder, May 2025.

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 Ukranian nationals, providing specific information for this group. In addition, UNHCR's services advisor platform[750] 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

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. Following the regime change in Syria in December 2024, Turkish officials adopted a markedly more vocal stance in encouraging Syrians to return to their country of origin. Against this backdrop, stakeholders widely report that authorities have sought to empty Temporary Accommodation Centres (TACs) as far as possible. In stakeholders' assessment, this push disproportionately targets individuals who remain dependent on humanitarian assistance, particularly for their accommodation needs, suggesting an underlying policy aim of phasing this group out of the camp system altogether.[751] This orientation finds some support in PMM's own activity report, which states that efforts are underway to facilitate the exit of camp residents in order to support their integration into social life and to ensure a dignified and safe return to their countries. According to the same source, PMM maintains a policy of accommodating individuals with special needs within the camps and minimising the social and physical difficulties they may face there; PMM describes its objective as twofold, improving camp conditions for residents with special needs, while encouraging those without special needs to integrate into social life and pursue return in a dignified and safe manner.[752]

For more detail, please see Differential treatment of specific nationalities in the procedure.

750 Available here.
751 Information provided by multiple stakeholders, April and May 2026.
752 PMM, *Faaliyet Raporu 2025*, available here.

Detention of Asylum Seekers

A. General

Indicators: General Information on Detention	
1. Total number of asylum seekers detained in 2025:[753]	Not available
2. Number of asylum seekers in detention at the end of 2025:	Not available
3. Number of Removal Centres:	32
4. Total capacity of Removal Centres:	18,780

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 to 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. No capacity increase is planned for removal centres in 2026. In the first quarter of 2026, a new Removal Centre Directive is expected to enter into force, consolidating the previously fragmented legislative framework governing removal centres into a single instrument and updating the administrative structure and operational procedures of these facilities in line with current needs. A separate Lost and Found Property Directive, establishing procedures for handling belongings left behind by detainees, is also planned for adoption.[754]

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.[755]

The LFIP provides that international protection applications of detained applicants shall be finalised "as quickly as possible",[756] and that they fall within the scope of the Accelerated Procedure[757] (see also Applications from detention and at the border).

753 Including *both* applicants detained in the course of the asylum procedure and persons lodging an application from detention.
754 PMM, *Faaliyet Raporu 2025*, available here.
755 Information provided by stakeholders, March – April 2024.
756 Article 68(5) LFIP.
757 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:	☒ Yes	☐ No
❖ at the border:	☒ Yes	☐ 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;[758] and
- Administrative detention for the purpose of removal.[759]

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.[760] Persons 'may not be detained for the sole reason of having submitted an international protection application.[761]

Article 68(2) LFIP identifies four grounds that may justify detention of international protection applicants:

(a) 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;
(b) At border gates, for the purpose of preventing irregular entry;
(c) Where it would not be possible to identify the main elements of the applicant's international protection claim unless administrative detention is applied;
(ç) 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.

758 Article 68 LFIP.
759 Article 57 LFIP.
760 Article 68(2) LFIP; Article 96(1) RFIP.
761 Article 68(1) LFIP.

The law further provides that detention shall immediately cease where it is no longer necessary.[762]

The RFIP provides that where a person makes an application for international application while detained in a Removal Centre, they will remain in detention without being subject to a separate detention order for the purposes of the international protection procedure.[763] This not only runs contrary to the LFIP, which 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 registration of applications from Removal Centres, even this may involve a lengthy period of pre-removal detention. That said, the principal challenge in this regard lies not in the applicable legal framework itself, but in access to the international protection procedure: individuals who are unable to register an application are treated as irregularly staying foreigners and therefore subjected to pre-removal detention. In 2022, 2023 and2024 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. In 2025, this trend was broadly observed to continue, with stakeholders additionally noting the increasing use of electronic monitoring as an alternative to detention in a limited number of cases [764] (see the section on Alternatives to detention).

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 2025.[765] 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.[766] In 2025, 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 Stakeholders observed that throughout 2025, fewer Syrians were apprehended compared to the period before December 2024, a trend also reflected in irregular migration statistics. Those who were apprehended were reportedly encouraged to return to Syria promptly, with the result that arbitrary detention as such rarely arose as an issue in these cases. However, stakeholders also noted that in 2025, Syrian nationals involved in criminal proceedings, including as complainants, continued to be detained and strongly encouraged to return to their country of origin. [767] (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

762 Article 57(4) LFIP.
763 Article 96(7) RFIP.
764 Information provided by stakeholders, March – April 2024. Information provided by multiple stakeholders April and May 2025, Information provided by multiple stakeholders February and March 2026
765 Information provided by stakeholders, March – April 2026.
766 Information provided by various stakeholders, May-June 2023.
767 Information provided by multiple stakeholders April and May 2026.

and violations of procedural safeguards, and about the period of detention, conditions and access to appeal[768] (See Access to the territory).

In practice, it is widely reported that applicants for international protection are held in facilities at the airport. 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.[769]

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 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, some stakeholders reported instances in 2024 and 2025 where individuals apprehended at the eastern borders were removed without being subjected to any procedure. In other cases, detainees cannot be deported since Türkiye lacks removal arrangements with the relevant countries.[770] Throughout 2025, stakeholders observed that the period between apprehension and transfer to a removal centre increasingly functioned as a form of irregular detention. Police station yards and other informal sites, including open-air holding areas, were used to hold individuals outside any formal legal framework, without administrative records, case files, or standardised procedures. As these sites carry no official status, lawyers were unable to access detainees or review files during this period, effectively preventing any legal challenge to the lawfulness of detention.[771]

Stakeholders in Istanbul documented a range of systemic concerns relating specifically to the YTS (Yabancı Terörist Savaşçı / Foreign Terrorist Fighter) designation. Individuals labelled as YTS are routinely transferred to immigration authorities and placed in removal centres under more restrictive conditions, even where no criminal investigation has been initiated or where the public prosecutor has issued a decision of non-prosecution. Acquittals and non-prosecution decisions issued by criminal courts are disregarded by migration authorities, and the YTS designation itself is not subject to meaningful judicial review in administrative proceedings. Stakeholders further highlighted that the designation frequently results from unreliable or erroneous information: examples cited include landlords filing false ISIS-related reports against foreign tenants to reclaim properties, reports filed solely on the basis of physical appearance such as a long beard, and cases of mistaken identity arising from common Arabic naming conventions. Compounding these concerns, individuals holding YTS status who request voluntary return are reportedly denied this option, with accounts suggesting that persons with a YTS label will not be transferred anywhere from Türkiye. Stakeholders characterised this combination of measures, administrative detention, unappealable designation, disregard of judicial findings, and denial of voluntary return, as a systematic violation of the presumption of innocence and the right to liberty, leaving hundreds of individuals, including those whose innocence has been judicially established, in prolonged and legally unresolvable detention.[772]

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768 Mülteci-Der, Joint Assessment: Proposed Amendments in the Law on Foreigners and International Protection of Türkiye, 4 December 2019, available here

769 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.

770 Relief Web, 'Turkiye: Joint Submission to the Committee on the Protection of the Rights of All Migrant Workers and Members of their Families', 2022, available here.

771 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yilina ilişkin gözlem ve tespitler*, 20 June 2026, available here.

772 Information provided by various stakeholders, October 2025.

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.[773]

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.[774] 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.'[775] 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). As of 2025, this is still 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 province of residenceswithin 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.[776] Sometimes they need to wait for hours in a long queue outside, without even access to toilets to fulfil their reporting duties in Istanbul.[777] In addition, people were not properly informed of this obligation upon release from the Removal Centre.[778] In 2025, this continued as stakeholders reported that many individuals were released from detention with a T6 document, 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.[779]

773 Article 71(1) LFIP.
774 Article 68(6) LFIP.
775 Article 96(5) RFIP. Article 68(6) LFIP only refers to the obligations in Article 71 LFIP where detention is lifted.
776 Information provided by stakeholders, February 2018, May 2023, and March- April 2024.
777 Information provided by a stakeholder, March 2024.
778 Information provided by a stakeholder, February 2019, May 2023.
779 Information provided by a stakeholder, May 2025.

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
d) Return consultancy
e) Working on a voluntary basis in public benefit services
f) Guarantee
g) 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.[780] These measures shall not be applied for more than 24 months and non-compliance shall be a ground for imposing pre-removal detention.[781] 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.[782]

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.[783]

The alternative measures detailed in the regulation are the following:

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.

780 Resmî Gazete,14 September 2022, available in Turkish here.
781 Ibid.
782 Ibid.
783 Ibid.

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 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: as of December 2025 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 Security[784].

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).[785] After delivering the deposit to the PDMM, the foreigner is no longer under administrative detention. The individual has, however, an obligation to report 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 As of 2025, the trend of applying this measure is highly arbitrary. The examples are so few that practitioners are often uncertain about the current amount of the guarantee.[786]

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 tagging. 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 foreigner or legal representative may file a criminal complaint against this obligation.[787]

784 Information provided by a stakeholder, May 2025.
785 Information provided by a stakeholder, June 2025.
786 Serbestiyet, *GEREĞİ DÜŞÜNÜLDÜ | Av. Halim Yılmaz: "Geri gönderme merkezlerinin şartları cezaevlerinden daha ağır"*, 20 July 2025, available here.
787 Ibid.

As of 2025, in practice, currently, only some alternatives are in use. Lawyers were mainly aware of their clients being asked to undertake signing in/reporting duties and being placed at a residential address.[788] 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.[789] However, some stakeholders reported isolated instances of electronic monitoring being applied in 2025.[790] 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 notification by phone cannot be implemented by the PPM due to a lack of technological infrastructure.[791] There were some trainings targeting the personnel of PMM on referring 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.[792]

The assessment for imposing alternatives to detention instead of detention is not carried out systematically and effectively. In 2025, in almost 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.[793] 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.[794] In 2025, stakeholders reported a notable increase in the use of electronic monitoring as an alternative to placement in a removal centre, particularly in Ankara. The criteria governing its application, including who is subject to it, on what grounds, and for what duration, remain unclear and appear to be applied inconsistently. Individuals subject to electronic monitoring are fitted with an ankle bracelet and required to remain within a designated area, with periodic reporting obligations to the relevant GÖKSEM facility in their province. Stakeholders noted that legal challenges against electronic monitoring orders face the same structural inefficiencies observed in challenges to administrative detention more broadly, including the Constitutional Court's position that applicants should first exhaust compensation proceedings before bringing individual applications, and the prevailing judicial view that decisions to release individuals from administrative detention are final and therefore not subject to further review. The reasons behind this practice remain unclear. Stakeholders note that many alternatives to detention, although set out in detail in legislation, remain largely unused, and speculate that this may be linked to international pressure on the PMM to apply them more consistently. [795]

PMM leads the development and implementation of the alternatives to 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'

788 Information provided by stakeholders, March 2023, March 2024.
789 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.
790 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yilina ilişkin gözlem ve tespitler*, 20 June 2026, available here.
791 Information provided by stakeholders, March 2024.
792 Information provided by stakeholders, March 2024.
793 Information provided by a stakeholder May 2025.
794 Information provided by various stakeholders, June 2023.
795 Information provided by a stakeholder, April 2026.

rights and reduce dependence on detention.[796] According to stakeholders, despite efforts by international institutions to organise 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[797] (see Applications from detention and at the border).

UNHCR and IOM lead an EU-funded project "Supporting the Capacity of Removal Centres and Developing Alternative Measures to Administrative Detention",[798] which aims at supporting the institutional capacity of Removal Centres, strengthening procedural measures for access to rights and services in Removal Centres, and searching for alternatives to administrative detention. There are two finalised and one ongoing project led by ICMPD. The ENACT[799] (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[800] 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.

In 2025, stakeholders reported an informal practice observed in removal centres that operates outside any established legal framework as an alternative to continued administrative detention. Practices in removal centres are subject to frequent change, and such changes are not communicated in advance to those held in administrative detention or to their legal representatives. Many practices lack a written legal basis. One example that has come to the attention of legal practitioners concerns the use of notarised undertakings as a mechanism for securing the release of individuals from administrative detention. Under this practice, a notarised undertaking is submitted to removal centre management, typically containing commitments that the signatory will cover all living expenses of the detained individual, that the individual will reside at a specified address, and that the individual will comply with any call-up requirements of the authorities. In a number of cases, individuals appear to have been released following contact between removal centre management and intermediaries able to facilitate such arrangements. However, legal practitioners acting independently who have attempted to replicate this procedure have reported that equivalent applications, including undertakings provided by family members of the detained individual, were either rejected or met with the response that no such formal procedure exists. This inconsistency raises serious concerns about the absence of a standardised release mechanism and suggests that outcomes may vary according to the individual case and the nature of contacts available to those seeking release. The practice has also been observed to erode trust between detained individuals and their legal representatives, who find themselves unable to replicate outcomes that have demonstrably occurred in comparable circumstances.[801]

796 EU Migration Law Blog, *The EU support for alternatives to immigration detention in Türkiye: a curious case at odds with EU's external migration policy?*, 17 January 2024, available here & Information provided by a stakeholder, March 2024, available here.
797 Information provided by a stakeholder, February 2025.
798 PMM, *Ongoing Projects*, available here.
799 ICMPD, *Enforcing Capacities For Application Of Alternative Measures To Detention in Türkiye (ENACT) Project*, available here.
800 PMM, *Faaliyet Raporu 2025*, available here.
801 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yilina ilişkin gözlem ve tespitler*, 20 June 2026, available here.

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.[802] In 2023, the UN Committee on the Rights of the Child expressed concern that asylum-seeking and refugee children, including those who are unaccompanied and separated, are at a high risk of being held in immigration detention.[803] In practice, unaccompanied children often declare being over the age of 18 to avoid separation from their groups.[804] In 2023 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 adults.[805] Incidents where minors are kept under detention together with adults and not in separate locations are common.[806] According to the law, children at risk and children convicted of an offence should be transferred to Child Support Centres (*Çocuk Destek Merkezleri*, ÇODEM).[807]

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 process.[808] 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 children.[809] In 2024 and 2025, 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.[810]

In 2025, it was reported by an initiative that a seventeen-year-old Syrian national was detained at Şanlıurfa Removal Centre. Her minor status was clearly identifiable from her passport documents, yet she was nonetheless admitted to the RC by the PDMM provincial administration. She was also pregnant at the time of her detention. Her detention raised serious concerns under both Law No. 6458 and Türkiye's international obligations, as the detention of minors in removal centres is prohibited, and pregnant women constitute a vulnerable group requiring alternative arrangements. The removal centre has itself been the subject of documented concerns regarding conditions. Although multiple actors claimed that the individual was 17

802 Article 66(1)(b) LFIP.
803 Committee on the Rights of the Child, *Concluding observations on the combined fourth and fifth periodic reports of Türkiye*, 21 June 2023, available here.
804 Information provided by a stakeholder, February 2019, May 2023 and March – April 2024.
805 Information provided by a stakeholder, March 2024.
806 Information provided by various stakeholders, June 2023.
807 Regulation No 29310 of 29 March 2015 on Child Support Centres, available in Turkish here.
808 Mülteci Hakları Merkezi, *Türkiye'deki Refakatsiz Sığınmacı Çocukların Hukuksal Korumaya Erişimi: Tespitler ve Değerlendirmeler*, September 2022, avaible here.
809 Ibid.
810 Information provided by multiple stakeholders February, March and April 2025.

years old and therefore subject to the legislation applicable to unaccompanied minors (UAC), the authorities treated her as an adult.[811]

An additional case reported in 2025 concerned another pregnant Syrian national who was handed over to police by officials while applying for a temporary protection ID at the İzmir Provincial Directorate of Migration Management, and was scheduled for transfer to an RC.[812]

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, LGBTQI+ 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 difficult for transgender people to continue their hormone treatment during detention.[813] They sometimes faced social isolation in the removal centres, not being able to access open air as much as one should.[814] Discrimination may also occur with isolation. 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.[815] In 2025, the detention of LGBTI+ individuals lacked any standardised practice. Some stakeholders reported that transgender individuals were, in certain cases, detained in accordance with their gender identity. However, there were also instances where detention itself functioned as a form of punishment, as individuals were placed with those of the contrary gender.[816]

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 2025, stakeholders reported that the practice of requiring detained sex workers to undergo blood testing continued.[817]

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.[818] 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.[819] 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.[820] In 2025, stakeholders reported that HIV-positive detainees continued to be subjected to stigmatising practices within removal

811 X (formerly Twitter), gocmenlerle, available here; Mazlumder, *Reşit Olmayan Çocukların Yasa Dışı İdari Gözetimine Son Verilmelidir*, 17 December 2025, available here.
812 Evrensel, 8 aylık hamile mülteci kadın GGM'ye gönderiliyor, 03.11.2025, available here
813 Information provided by stakeholder, March 2024.
814 KAOS GL, 06 December 2023, *10 şehirden avukatlar, mülteci LGBTİ+'ların hakları için buluştu*, available here.
815 Information provided by multiple stakeholders May 2025.
816 Information provided by multiple stakeholders, April and May 2026
817 Information provided by a stakeholder, May 2025.
818 Information provided by a stakeholder, March 2024.
819 Emep, *Geri gönderme merkezinde HİV Pozitif mülteciye kötü muamele*, 18 July 2024, available here.
820 Information provided by a stakeholder, May 2025.

centres, including isolation and the placement of signs on their cells identifying them as individuals with AIDS. These practices were reported to compound discrimination, as they exposed detainees to further stigmatisation and mistreatment by fellow detainees in addition to any institutional neglect they already faced.[821]

In May 2025, a Russian national who was 7.5 months pregnant and classified as a high-risk pregnancy was reported to remain in administrative detention at Çatalca Removal Centre despite her acquittal in the related criminal proceedings, as the Criminal Magistrate's Court did not terminate the administrative detention order following the acquittal. Following childbirth, the woman was hospitalised for approximately six weeks, after which she was returned to the removal centre with her baby.[822]

In June 2025, an Uzbek national was placed in administrative detention on grounds of irregular residence and transferred to a removal centre, despite being scheduled to undergo surgery for an ovarian cyst later that month. Medical documentation confirming the need for urgent intervention was submitted to the relevant authorities, but the administrative detention order was upheld and a judicial challenge was rejected on grounds of flight risk.[823]

On 8 August 2025, an Afghan woman held at Çatalca İnceğiz Removal Centre died by suicide. Istanbul Governorship confirmed the death in a press statement dated the same day, noting that forensic and administrative investigations had been initiated.[824] According to allegations raised in a parliamentary question submitted to the Minister of Interior on 11 August 2025, the deceased had been subjected to ill-treatment, pressure, and poor living conditions prior to her death, and staff intervention was allegedly insufficient and delayed. It was further alleged that witnesses were compelled to sign statements characterising the incident as attributable to psychological problems, and that two additional suicide attempts occurred at the same facility in the aftermath of the incident. Following the death, access to the centre was restricted and telephone communications were curtailed.[825] Bar Associations and NGOs also issued public statements, calling for an effective, impartial, and comprehensive investigation.[826] Accordingly, following the incident, most witnesses were transferred to other removal centres, preventing civil society actors from gathering firsthand accounts of the events.[827]

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.[828]

821 Information provided by multiple stakeholders, April 2026.
822 Information provided by a stakeholder, April 2026.
823 Bianet, *Raporlara rağmen ameliyat izni çıkmadı: Özbek mülteci GGM'de tutuluyor*, 23 September 2025, available here
824 T.C. İstanbul Valiliği, *Basın Açıklaması (2025-57)*, 11 August 2025, available here
825 Karar, *Çatalca GGM'de intihar ve kötü muamele iddiaları TBMM gündeminde: Yaşam hakkı ve insan onuru ihlal ediliyor*, 11 August 2025, available here.
826 X (formerly Twitter), İstanbul Barosu Mülteci ve Göçmen Hakları Merkezi, available here; X (formerly Twitter), Göçmen Mülteci Dayanışma Ağı, available here.
827 İstanbul Barosu Raporu.
828 Information provided by various stakeholders, June 2023 and March 2024.

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

Administrative detention in the international protection procedure is permitted for up to 30 days.[829] Pre-removal detention, on the other hand, may be ordered for 6 months, subject to the possibility of a further extension of 6 months.[830] However, migrants might re-detained after being released at the end of this period, undermining these time limits.[831]

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),[832] 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.[833] 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.[834] In provinces such as **İstanbul** and **İzmir**, detention exceeding the 48-hour deadline has been reported as a practice, even more than 15 days[835] (see Unofficial detention facilities). In 2024 and 2025, 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.[836] According to stakeholders, individuals held in administrative detention on security-related grounds generally remained detained for the maximum period permitted under the applicable legislation. In other cases, release within three to four months was reported to be the common practice in 2025.[837]

829 Article 68(5) LFIP.
830 Article 57(3) LFIP.
831 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, available here & Information shared by stakeholders March – April 2024.
832 Article 96(7) RFIP.
833 Article 57(2) LFIP.
834 Constitutional Court, *B.T.*, Decision 2014/15769, 30 November 2017, available here.
835 Information provided by various stakeholders, February 2019, March 2020, May 2023 and March 2024.
836 Information provided by multiple stakeholders, April 2025.
837 Information provided by multiple stakeholders, March and April 2026.

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 2025 there were 32 removal centres in 25 provinces with a total detention capacity of 18,780. and approximately 138,000 foreign nationals were housed in return centers in 2025. . **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 re-purposed as Removal Centres (see Types of Accommodation).

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 (Pehlivanköy)
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.

In **İstanbul,** the Çatalca (İnceğiz) Removal Centre is for women, **Binkılıç** for men. Binkılıç Removal Centre predominantly holds Afghan nationals.Tuzla Removal Centre is predominantly used for the detention of male nationals from Turkmenistan, Uzbekistan, Morocco, Tajikistan and Pakistan. At the beginning of 2024, the Arnavutköy premises were opened, comprising of 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 and 2025, 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. A stakeholder reported that, on a weekly basis, a bus departs from Arnavutköy for deportation procedures.

In 2025, the major problem faced by lawyers remained determining the removal centre where their client was 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 centre, which may take to a couple of days.[838] 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 2025. Uninformed, sudden transfers occur 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.[839] 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."[840]

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. [841]. Subsequently, the Presidency of Migration Management (PMM) issued a public statement denying the allegations.[842] Finally, the lawyers issued a follow-up statement, sharing their clients' accounts of the incident.[843]

The PMM does not publicly share official data on the individual capacities of RCs in Türkiye, and no facility-level breakdown is available. 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 380 but

838 Information provided by stakeholders, May 2023, Information provided by stakeholders, March 2024.
839 Information provided by stakeholder, March – April 2024.
840 Information provided by stakeholders, March 2021, May 2023 and March – April 2024, March, April and May 2025.
841 Bianet, İstanbul'da gözaltına alınan 35 mülteciden haber alınamıyor, 13.02.2024, available here.
842 Göç İdaresi Başkanlığı, X (Twitter), 18.02.2024, available here.
843 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.

reportedly 406 individuals were remaining there in August 2025[844], Arnavutköy RC around 1,500, and Kurubaş RC about 700.[845]

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 2016 Council of Europe report refers to them acknowledging that persons held in such facilities are deprived of their liberty.[846] 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.[847]

Police stations can be used for short-term detention of up to 48 hours prior to a Removal Centre.[848] These are used in practice in provinces such as **İstanbul and Izmir**.

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 2025, 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.[849]

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 time .[850] 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, including sometimes elderly people or people with health problems.[851] Arnavutköy presents a distinct operational profile, as it hosts both a police station and a temporary accommodation centre that functions differently from other such facilities across Türkiye. Unlike other temporary accommodation centres, individuals held at Arnavutköy are not permitted to leave the premises during daytime hours, and no legal remedy is formally available to challenge the placement. Notably, no legally recognised deprivation of liberty measure appears on the files of those held there, rendering their detention effectively invisible to judicial scrutiny.In 2025, some Afghan families were held in

844 MAZLUMDER, *29 Ağustos 2025 tarihli Çatalca Geri Gönderme Merkezi Ziyareti Raporu*, available here.
845 TİHEK, Ziyaret Raporları, available here; Information provided by multiple stakeholders, June 2025.
846 Council of Europe Special Representative for Migration and Refugees, *Report of the fact-finding visit to Türkiye*, 10 August 2016, para IX.1(a).
847 Information provided by a stakeholder, May 2023.
848 Article 57(2) LFIP.
849 Informatıon provided by stakeholders, May 2023 and March 2024.
850 Information from a stakeholder, May 2022.
851 Information provided by a stakeholder, March 2024.

the Arnavutköy Temporary Accommodation Center without a clear legal basis. In Arnavutköy police building, sometimes 30 people are held in a very small container, with hygiene problems. Although there have been some improvements in 2024, the conditions are still not suitable, especially in cases where temporary holds are extended.[852] According to the Istanbul Bar Association's report, in 2025, sites identified in this context include an open-air holding area in Istanbul's Zeytinburnu district where individuals were made to stand within a cordoned-off space, the yard of a health centre in Esenyurt, and police station yards in Dudullu and Aksaray. These sites share a defining characteristic: they operate without any formal legal status, administrative records, case files, or standardised procedures. Basic administrative instruments such as visitor logs, duty records, and identity document handling protocols are not maintained, and identity documents of those held are not produced upon request. This practice is evidenced by a directive dated 23 February 2026, issued by the Istanbul Provincial Police Directorate's Directorate for Combating Migrant Smuggling and Border Gates. The directive, concerning foreign nationals transferred to the holding and dispatch point at the yard of the Şehremini Police Station in Fatih district, expressly prohibits the entry of lawyers, interpreters, and relatives, and instructs that this order be communicated verbally to all personnel, with criminal and administrative proceedings to be initiated against any officer who fails to comply.[853] Stakeholders described the rationale behind this practice as: the premises are deliberately kept in this condition so that those held there become willing to give the authorities whatever they ask for.[854]

Aydın, İzmir: In İzmir, attorneys report that three containers have been constructed in front of the removal centre to detain all apprehended irregular migrants in poor and unclean conditions, including families with children.[855] The Izmir Solidarity Platform with Refugees investigated claims that refugees were held in vacant 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.[856] 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 inadequate.[857] According to stakeholders, conditions at the facility improved somewhat in 2025 — individuals are no longer held in open-air settings but are provided with covered accommodation. Procedural deficiencies nonetheless persist, as no formal administrative framework governs the facility's operation. When queried by lawyers, officials have characterised the practices observed as standard GÖKSEM procedure; however, no documentation substantiating this characterisation has been made available to legal practitioners.[858]

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 ineligible 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)

852 Information provided by a stakeholder, March 2024 And May 2025.
853 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yilina ilişkin gözlem ve tespitler*, 20 June 2026, available here.
854 İdame Medya, *Boraltan köprüsü | Türkiye'de Mülteci Olmak*, 28 August 2025, available here.
855 Information provided by a stakeholder, May 2023.
856 Evrensel Sayfalari, 'İzmir Mülteci Dayanışma Platformu: Mülteciler insani olmayan koşullarda tutuluyor', 2022 available in Turkish here.
857 Information provided by a stakeholder, April 2025.
858 Information provided by a stakeholder, April 2026.

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 varies 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 forms[859]. 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 returns[860].

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 first apprehens ion, individuals are issued a formal notification to return to their registered province and sign in regularly. Upon 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. In 2025, a decongestion process resulted in the partial closure of TACs and container sites across south-eastern Türkiye. Of the 11 TACs in the region, six have been closed or are in the process of closure; these include the TACs in Kahramanmaraş, which was fully evacuated in November 2025, and the Boynuyoğun and Yayladağı TACs in Hatay, both evacuated by the end of September 2025. The remaining operational facilities are the Sarıçam TAC in Adana, the Nizip and Islahiye-2 TACs in Gaziantep, the Elbeyli TAC in Kilis, and the Harran TAC in Şanlıurfa.

Persons with specific needs, including those with disabilities or severe medical conditions, together with their family members, may be referred to the Sarıçam TAC, which currently accommodates approximately 2,900 individuals, with close to 60 per cent of the 1,224 UNHCR-provided containers occupied. All other individuals affected by the closure process may relocate to any province of their choice or register an address within the same province; voluntary return to Syria is also available as an option. In Hatay, Belen Container City, Hilalkent Container City, Reyhanlı Kumevler Container City, and four additional container settlements have been closed. Of 19 container sites in the south-east, 15 are planned for closure, of which 10 have already been closed.[861] In Malatya, Beydağı Container and containers in zones 3 and 4 are in the process of closure. Closure planning is also underway for the Adıyaman Bebek and Gölbaşı camps, though no official notification had been issued in 2025.[862]

According to stakeholders, individuals residing in closed TACs and container sites have been presented with four options: renting accommodation in their current city of residence, requesting relocation to another province, voluntary return to Syria, or for persons with specific needs upon documentation referral to Sarıçam TAC in Adana. However, stakeholders noted that the procedures for relocation to another province and for registering an address in the current city of residence remain unclear, and that further guidance was expected to be issued following an ad hoc meeting. The total population affected by the closure process

859 Global Detentıon Project, *Türkiye: Submission to the Committee against Torture*, 12 June 2024, available here.
860 Information provided by a stakeholder, March 2024.
861 UNHCR Türkiye, Operational Monthly Update, October 2025.
862 Information provided by multiple stakeholders, September 2025.

is not precisely known; according to stakeholders, more than 7,000 households, approximately 35,000 individuals, were residing in TACs as of September 2025.

According to PMM's 2025 activity report, 9,224 individuals were transferred to TACs during the year, while 57,690 individuals were discharged as part of the ongoing decongestion process. The report confirms that by the end of September 2025, the TACs in Malatya Beydağı, Osmaniye Cevdetiye, Hatay Apaydın, Yayladağı, and Boynuyoğun had been fully evacuated, with Kahramanmaraş TAC following in November 2025. Congestion at Sarıçam TAC in Adana was also significantly reduced. The stated policy objective is to redefine the function of TACs: designated facilities are to accommodate persons with specific needs only, while remaining TACs are to be used for Syrians who are unregistered or who have failed to comply with their obligations under the temporary protection regime.[863]

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. As of 2025, Nizip TAC has assumed a primary function in the processing of international protection applications in the south-east, a role previously associated with Harran TAC in 2024. Individuals whose international protection applications are received by the relevant Provincial Directorate of Migration Management are in practice referred to Nizip TAC for the duration of the procedure, without travel costs being covered. Decisions have been observed to be issued within approximately two to three months, the majority of which are negative, though a number of individuals have been granted international protection status.

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. In 2025 this trend was observed in Nizip rather than Harran. Between January and March 2026 serious allegations concerning conditions at Harran TAC came to light through on-site visits by legal representatives, written accounts transmitted from within the facility, and official documents made available through legal proceedings. The allegations, which concerned two Syrian nationals of Alevi background held at the facility, described a pattern of religiously discriminatory treatment at the hands of both facility staff and other residents, including verbal abuse, physical violence, and denial of adequate food and healthcare. Staff were alleged to have categorised and addressed residents by religious identity and to have failed to intervene when violence occurred. Freedom of movement within the facility was reported to be severely restricted, and residents were alleged to have been placed in solitary confinement, described officially as a protective measure. It was further alleged that residents were pressured to participate in the filming of a video attesting to satisfactory conditions, and that their refusal resulted in communication restrictions and other punitive measures.[864] Following a suicide attempt by one of the two individuals, attributed in the accounts to the cumulative effect of these conditions,

863 PMM, *Faaliyet Raporu 2025*, available here.
864 Muzır, *Harran'da mülteciler yeni yıla izolasyon, tehditle girdi!*, 17 January 2026, available here.

deportation proceedings were initiated against both on grounds of posing a threat to public order under Article 54 of Law No. 6458, and both were subsequently transferred to removal centres. Official documents reviewed in connection with the case revealed a number of procedural irregularities, including notification forms with blank fields for legal aid information, missing time entries, unsigned documents bearing only a "refused to sign" stamp, and Arabic-language sections left entirely blank, raising questions as to whether the individuals were effectively informed of the grounds for their detention and their right to appeal. Medical examination records indicating no signs of physical injury were disputed by the legal representatives, who maintained that one individual had sustained a broken tooth as a result of physical assault. The case also raised concerns regarding the third-country deportation destination indicated in the official file and whether an adequate individual risk assessment had been conducted in light of the individuals' religious identity and the circumstances of their detention. Facility authorities declined to respond to the allegations, and legal proceedings remained ongoing at the time of reporting.[865]

In 2025, a documentary reported that, prior to referral to Removal Centres, a police officer offered a bribe to a lawyer, stating that he had access to lists of all individuals entering pre-detention facilities. He offered to share these lists with the lawyer, who would then be free to identify those able to pay substantial sums. Once the lawyer reached an agreement with such individuals, the officer would issue instructions for their release from the pre-detention centre without referral to a Removal Centre, in exchange for a share of the lawyer's fee.[866]

As per the announcement, GÖKSEM (Referral Centers for Irregular Immigrants), which started operating on December 8, 2023[867], 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 2025, 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.[868]

2. Conditions in detention facilities

Indicators: Conditions in Detention Facilities		
1. Do detainees have access to health care in practice?	☒ Yes	☐ No
❖ If yes, is it limited to emergency health care?	☒ Yes	☐ No

All Removal Centres in Türkiye are under the authority of PMM and each centre is managed by a director.[869] 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;

865 Muzır, *Mülteciler anlattı, yetkililer sessiz: Harran'da işkence ve ayrımcılık iddiası*, 16 January 2026, available here.
Muzır, *Mektuplar ve resmi evraklar Harran'daki muameleyi ve sınır dışı sürecini sorgulatıyor*, 16 March 2026, available here.

866 İdame Medya, *Boraltan köprüsü | Türkiye'de Mülteci Olmak*, 28 August 2025, available here.

867 *İçişleri Bakanımız Sayın Ali Yerlikaya İl Göç İdaresi Müdürleri Değerlendirme Toplantısında Konuştu*, 16 January 2024, available here.

868 Information by multiple stakeholders, April and May 2025.

869 Article 11 Removal Centres Regulation.

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.[870]

In 2017, in line with the monitoring provisions of the Regulation,[871] PMM instructed all the mayoralties 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 regular visits to the centres. The composition of the commission depends entirely on each mayoralty. Generally, Türk Kızılay is present in these commissions.[872] The commission convened once in 2024 and once in 2025, primarily to discuss the ongoing efforts to combat irregular migration.[873]

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 centres.[874] As a result of holding more people than their capacities, there are problems with access to water, and hygiene. In most centres, access to open air is limited to around one hour after each of the three meals. There were reports that the Kocaeli centre was not providing this access.[875] Detainees are not able to complain when they are exposed to rights violations, which causes a lack of information regarding conditions in the centre. On the other hand, accessing information regarding their rights is also challenging.[876] 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.[877]

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 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 difficult, as their phones are confiscated and stored, hindering their communication as they cannot recall phone numbers. Transgender women face bad treatment by gendarmeries in the centres, are put in the same place as men and face 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 Istanbul, Izmir, and Ankara.[878] In 2024, stakeholders reported that poor treatment

870 Article 14(1) Removal Centres Regulation.
871 Article 16 Removal Centres Regulation.
872 Information provided by a stakeholder, February 2018.
873 T.C. Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya'nın Başkanlığında 14. Göç Kurulu Toplantısı Gerçekleştirildi, 31 January 2024, available here; T.C. Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya'nın Başkanlığında 15. Göç Kurulu Toplantısı Gerçekleştirildi, 29 January 2025, available here.
874 Information provided by stakeholders, March – April 2024.
875 Information provided by a stakeholder, March 2024.
876 Information provided by a stakeholder, March - April 2024.
877 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*, 20 April 2023, available here.
878 Information from stakeholders, March 2024.

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.[879] According to a visit report in 2025, rooms designed for 6 to 8 persons were found to be operating beyond capacity, with insufficient space per person and a lack of personal storage areas. Ventilation was inadequate, natural light was limited, and recurring infrastructure failures in sanitation facilities, including frequent water outages in toilets and bathrooms, were documented. The infirmary was staffed by a single doctor serving the entire population, causing appointment delays of several days; the infirmary room itself was described as small and poorly ventilated. Psychological support services were absent, with no psychologist, social worker, or child psychiatrist on staff. The children's activity room was not consistently accessible and was not staffed by an educator. The sole outdoor play equipment, a single swing-and-slide unit, was noted to be dirty and in poor repair, insufficient for the 35 children in residence. Security cameras were present throughout the facility, including common areas, but were absent from private spaces such as dormitories, bathrooms, and toilets. Male security personnel were observed freely moving through floors housing women, raising concerns regarding privacy. Complaint mechanisms, consisting of a wall-mounted complaint box and an electronic submission device, were positioned within direct line of sight of security personnel, undermining confidentiality. The electronic device imposed mandatory category selection and a character limit, restricting detainees' ability to express complaints fully.[880] In 2025, stakeholders observed that the provision of expired food and other products to detained individuals, with no effective monitoring mechanism in place.[881]

In **Binkılıç**, there were 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 **Pehlivanköy**, 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 the lack of personnel and the instructions, 12 people are accommodated in rooms of 8, and sometimes the gym is open 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 was a water shortage and access to clothing was 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.[882]

Arnavutköy Removal Centre were described by an individual who documented their detention on video. The facility houses separate sections for women, men, and families. In the women's section, staff conduct was reported as harsh. Food provision consisted of a single cheese sandwich and water per day, though the individual noted that meals were provided three times daily in a subsequently assigned section. Rooms accommodated six to eight people with no privacy; beds vacated temporarily could be occupied by others upon return. Bathrooms are shared, reportedly very dirty, and cleaning responsibilities are left to detainees, who receive only a small amount of shampoo and soap. Some rooms had plumbing problems, which detainees were also expected to resolve themselves. Food quality in the second section remained poor, with rice served undercooked. A small shop is available but reported as expensive. Phone access is provided but connectivity is weak, and access can be revoked as a disciplinary measure. The individual

879 Karar, *Geri gönderme merkezindeki kadınlar kötü muameleye isyan etti*, 01 November 2024, available here.
880 Mazlumder, *29 Ağustos 2025 Tarihli Çatalca Geri Gönderme Merkezi Ziyareti Raporu*, 17 September 2025, available here.
881 Information provided by a stakeholder, September 2025.
882 Information provided by stakeholders, March – April 2024.

noted that conditions in their second section improved following public attention generated by social media coverage of their case, suggesting that external pressure influences treatment. Conditions were described as particularly inadequate for children, elderly persons, women, and other vulnerable individuals, with illness reported as spreading among detainees.[883]

Harmandalı: Monitoring visits conducted between April and July 2025 confirmed the persistence of systemic deficiencies at İzmir Harmandalı Removal Centre. Rooms designed for eight detainees were routinely accommodating between 14 and 16 individuals, with some forced to sleep on the floor. Access to hot water was consistently restricted, and drinking water was rationed. Outdoor time was limited to approximately 15 to 20 minutes following meals, which detainees described as wholly insufficient. Healthcare access remained gravely inadequate: detainees with chronic conditions, including kidney disease, heart disease, and mobility impairments, reported being denied prescribed treatment or referrals to external hospitals. Mental health deterioration was widely reported, with detainees describing depression, anxiety, hopelessness, and suicidal ideation, in the complete absence of psychosocial support. Legal and procedural safeguards were inconsistently applied: deportation and detention decisions were routinely delivered without interpretation, and requests for legal representation frequently went unanswered. Allegations of physical violence by gendarmerie officers inside the infirmary, where no cameras are present, were recorded, with one detainee reporting that he was subsequently accused of attacking a doctor and transferred to prison for one month. International telephone calls were not permitted, and access to domestic calls was dependent on the purchase of prepaid cards that many detainees could not afford.[884]

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.[885] A journalist who reported on alleged rights violations at Çatalca Removal Centre was prosecuted for disseminating false information to the public, with the prosecutor seeking a custodial sentence in September 2025. Following a hearing at which lawyers quoted in the original article testified that the accounts were factually grounded, the Istanbul 2nd Criminal Court of First Instance acquitted the journalist in March 2026.[886]

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.[887]

Gaziantep: On 20 November 2025, 56 foreign nationals held at the Gaziantep (Oğuzeli) removal centre were transferred to hospitals in the city following the onset of symptoms consistent with food poisoning, including vomiting and diarrhoea. Of those hospitalised, 48 were discharged on the same day after outpatient treatment, while the remaining 8 were kept under observation; no life-threatening conditions were reported. In a statement issued by the Gaziantep Governor's Office, the facility's health unit was described as having promptly identified the symptoms and notified emergency services.[888]

Stakeholders report that detainees who had experienced both prison and removal centre conditions, typically individuals transferred to an RC upon completing a criminal sentence, frequently asked their

883 X (formerly Twitter), gocmenlerle, available here.
884 Mülteci-Der, *Report on İzmir Removal Center Visits (April-June 2025)*, 23 September 2025, available here.
885 Karar, *Avukatlardan Geri Gönderme Merkezi için çarpıcı iddialar: göçmenlere 'Sessiz Oda' ve 'Soğuk Oda' işkencesi*, 07 November 2024, available here, Information provided by a stakeholder, March 2025.
886 MLSA, Journalist Feyza Nur Çalıkoğlu acquitted in trial over deportation center reports, 26 February 2026, available here.
887 TBB ibid.
888 Sol, Geri Gönderme Merkezi'nde zehirlenme: 56 kişi hastaneye kaldırıldı, 21 Noember 2025, available here.

lawyers whether it was possible to return to prison, suggesting that removal centre conditions were perceived as harsher.[889]

See the previous updates of the AIDA country report for past observations of detention conditions in different centres in Turkiye.

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'.[890] Access to psychosocial support services is also possible.[891] Psychosocial support teams try to identify vulnerabilities in the centres and refer individuals for PMM, but capacity issues present challenges[892]. 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 conditions[893]. The staff at the centres received training on first aid, crisis management, secondary trauma, and infectious diseases under an IOM project.[894] 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 services[895].

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.[896] Several actions were taken concerning the conditions of women in Removal Centers, including a parliamentary research proposal.[897]

In 2025, healthcare access at İzmir Harmandalı Removal Centre remained gravely insufficient. Detainees with chronic illnesses, including heart disease, kidney conditions, and mobility impairments, reported being denied timely or adequate medical treatment, with care limited to generic painkillers. Several detainees described delays or outright denial of referrals to external hospitals despite prescribed treatment plans. An elderly female detainee suffering from kidney disease and impaired hearing reported being unable to access daily treatment prescribed by an external hospital. Another detainee with heart disease and severe varicose veins stated that he could neither see a doctor nor obtain medication. A female detainee who had experienced gender-based violence reported that repeated requests for an eye examination had gone unanswered. Mental health deterioration was widely and consistently reported. Detainees described symptoms of depression, severe anxiety, hopelessness, and in some cases suicidal ideation, exacerbated by the uncertainty of indefinite detention. No psychosocial support services of any kind were available. One detainee stated that prolonged detention had destroyed his psychological wellbeing and expressed fear of complete mental collapse if his detention continued.[898]

889 Serbestiyet, GEREĞİ DÜŞÜNÜLDÜ | Av. Halim Yılmaz: "Geri gönderme merkezlerinin şartları cezaevlerinden daha ağır", 20 July 2025, available here
890 Article 14(1) Removal Centres Regulation.
891 Article 14(2) Removal Centres Regulation.
892 Information provided by stakeholders, March – April 2024.
893 Information provided by stakeholders, March – April 2024.
894 Information provided by a stakeholder, March 2024.
895 Information provided by a stakeholder, March 2024.
896 Gazete Duvar, Ahmed Aabo, Geri Gönderme Merkezi'nde ölüme terk edildi, 16 July 2024, available here.
897 Kadın İşçi, *Geri gönderme merkezinde kadın olmak*, 21 May 2024, available here; Gazete Duvar, *Mülteci kadınların sorunlarına ilişkin araştırma önergesi*, 17 October 2024, available here.
898 Mülteci-Der, *Report on İzmir Removal Center Visits (April-June 2025)*, 23 September 2025, available here.

In 2025, at Çatalca Removal Centre, a facility housing 406 individuals, healthcare was provided by a single doctor supported by one infirmary. Appointment delays of several days were reported even for non-emergency cases, attributable to the chronic understaffing relative to the detainee population. While emergency referrals to external state hospitals were available in principle, detainees reported that detailed medical examinations were not systematically conducted, and hospital referral requests were frequently unsuccessful due to the inadequacy of the on-site infirmary. The infirmary itself was described as small and unventilated, creating conditions unsuitable for clinical work. No regular psychological support services were provided, and no child psychologist or pedagogist was present, despite thirty-five children being held at the facility, two of whom had been identified as having special needs.[899]

A documentary reported that Removal Centre officials have been telling individuals that if they sign a voluntary return document, they will be able to return to their country and re-enter Türkiye afterward, whereas refusal to sign would result in detention at the RC for up to 12 months. This constitutes misleading information: individuals returned to their country of origin may in fact be issued an entry ban of up to five years, and there is no rule requiring individuals to be held for the maximum 12-month period, release before that point remains possible.[900]

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.

3. Access to detention facilities

Indicators: Access to Detention Facilities

1. Is access to detention centres allowed to:
   - ❖ Lawyers: ☒ Yes ☐ Limited ☐ No
   - ❖ NGOs: ☐ Yes ☐ Limited ☒ No
   - ❖ UNHCR: ☐ Yes ☒ Limited ☐ No
   - ❖ Family members: ☐ Yes ☒ Limited ☐ 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

899 Mazlumder, *29 Ağustos 2025 Tarihli Çatalca Geri Gönderme Merkezi Ziyareti Raporu*, 17 September 2025, available here.

900 İdame Medya, *Boraltan köprüsü | Türkiye'de Mülteci Olmak*, 28 August 2025, available here.

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.[901] 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.[902]

As mentioned in the report of Human Rights and Equality Institution of Türkiye on Tuzla Removal Centre,[903] 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 practices take in place in various centres.[904]
In 2025, some stakeholders described RCs as closed, inaccessible places.[905]

Attitudes toward lawyers in some centres may be negative:[906] It sometimes takes lawyers a full day to see a client, due to long waiting periods and remote locations. Various problems[907] arise due to the 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.[908] 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.[909] In 2025, stakeholders confirmed that the necessary infrastructure remained unavailable in most removal centres across Türkiye. Istanbul Tuzla RC was reported as an exception, where the hotline remained accessible;[910] stakeholders additionally noted that computers and a printer for lawyers' use had been installed at the same facility in early 2026.[911]

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901 Information provided by stakeholders, March – April 2024.
902 Ibid.
903 TIHEK, *Istanbul tuzla geri gönderme merkezi ziyaret raporu Rapor no: 2023/16*, available here.
904 Information provided by stakeholders, March-April 2024.
905 İdame Medya, *Boraltan köprüsü | Türkiye'de Mülteci Olmak*, 28 August 2025, available here
906 Information provided by stakeholders, March-April 2024.
907 Information provided by stakeholders, March-April 2024.
908 Information provided by stakeholders, March-April 2024.
909 Information provided by a stakeholder, February 2025.
910 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler*, 20 June 2026, available here.
911 Information provided by multiple stakeholders, May 2026.

In 2025, the PMM and the UTBA signed a cooperation protocol governing the conditions under which lawyers may access migration management units, including removal centres.[912] Following the conclusion of the protocol at the central level, Provincial Directorates of Migration Management subsequently sought to replicate the arrangement by entering into identical protocols with provincial bar associations. The protocol's substantive provisions are general in nature. Its operative content is largely contained in an annexed lawyer consultation form, which is intended to serve as a uniform document to be completed by lawyers prior to meeting with clients in migration management facilities across the country. Steakholders noted that although lawyers with experience in the migration field were consulted during the drafting process, their input was not fully incorporated into the final text. In particular, the form limits the number of clients a lawyer may consult in a single visit to two individuals. This restriction has been identified as a significant procedural obstacle, as it would require lawyers who travel to geographically remote removal centres to re-enter the queue after meeting with two clients before being permitted to conduct further consultations. On these grounds, a number of bar associations, including the Istanbul Bar Association, declined to sign the protocol.[913]

At both Arnavutköy and Çatalca removal centres, the glass panels separating lawyers from their clients in consultation rooms seriously impede the effective conduct of legal visits, rendering even basic tasks such as drafting petitions or exchanging documents impracticable. The microphones installed in these panels are frequently reported to be non-functional, forcing lawyers to raise their voices to communicate with their clients, with the result that conversations are audible to law enforcement officers waiting outside the door rather than to the clients themselves. The officers accompanying visits are law enforcement personnel rather than migration management staff, and are therefore unable to address procedural concerns, including malfunctioning equipment, as they report having no authority over such matters. This also prevents any meaningful discussion of sensitive or technical aspects of the case during the visit.[914]

At Çatalca, lawyers report that access to case files is routinely restricted on grounds of confidentiality, with only selected documents, in some instances limited to the administrative detention order and the deportation decision, made available for inspection. This prevents lawyers from reviewing the underlying documents on which the relevant administrative measures are based and significantly impairs the quality of legal analysis that can be conducted on behalf of detainees.[915]
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.[916] In 2025, 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 involved.[917]

912 PMM, *Göç İdaresi Başkanlığı ile Türkiye Barolar Birliği Arasında İş Birliği Protokolü İmzalandı*, 04 September 2025, available here.
913 Information provided by a stakeholder, March 2026.
914 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler*, 20 June 2026, available here.
915 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler*, 20 June 2026, available here.
916 Information provided by a stakeholder, May 2023 and March-April 2024.
917 Information provided by a stakeholder, May 2025.

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.'[918]
Several removal centres (such as Ankara, Çankırı, İnstanbul) are located far away from the city centres without any public transportation, and thus the only available transportation is by car or taxi, creating difficulties.[919] In İstanbul, 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.[920]

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.[921] The administrative complaints mechanism is ineffective, judicial methods are rather slow, but CIMER is a very useful remedy in this regard.

Lawyers who have filed complaints with prosecutorial or administrative authorities regarding practices at Binkılıç Removal Centre have reported that, following such complaints, procedures at the facility become markedly slower and they encounter increased administrative obstacles in the conduct of their work. This has a chilling effect on the exercise of lawyers' professional activities and, in some cases, risks undermining the trust relationship between lawyer and client, where the client is adversely affected as a result. Lawyers who have filed such complaints have further reported being warned by their clients that the latter had been threatened by facility management with deportation in retaliation for the complaints. Also, stakeholders reported that access to detainees at Binkılıç Removal Centre is significantly impeded by a strict name-matching requirement: lawyers must provide the detainee's name exactly as registered in the facility's system, and even minor discrepancies result in the request being refused. Unlike other removal centres, where alternative identifiers such as date of birth, parental names, or foreigner identification numbers may be used to locate an individual, no such methods are applied at Binkılıç. This practice is particularly problematic for nationals of countries such as Afghanistan, where similar names are common and transliteration from non-Latin scripts into Turkish produces inconsistent results. The problem is compounded in cases where individuals have been registered under different name spellings across facilities in different provinces and re-registered upon transfer to Istanbul without notification to the detainee or their lawyer. As detainees who do not speak Turkish are often unable to accurately reproduce the precise spelling under which they are registered, and lawyers have no means of ascertaining this information independently, access to clients at Binkılıç is in practice effectively obstructed.[922]

In 2025, legal practitioners have reported that access to clients held in removal centres is subject to administrative requirements beyond those prescribed by law. In practice, a bar-stamped power of attorney is required for all interactions with detained clients, including actions not conditioned on such a requirement under the applicable legislation, such as retrieving personal belongings held in the facility's custody on behalf of the client with the client's express consent. Where a detained individual has been transferred from one removal centre to another, a new bar-stamped power of attorney must be submitted to the receiving facility, as the original case file is not transferred alongside the detainee. Lawyers have further noted that printing facilities are unavailable within removal centres, and that arrangements whereby a power of

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918 TBB Ibid.
919 Information provided by a stakeholder, March 2020, May 2023 and March-April 2024. And February, April and May 2025.
920 Information provided by a stakeholder, February 2025.
921 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.
922 İstanbul Barosu, Ibid

attorney is transmitted remotely for the client to affix the stamp on site are not accepted by facility administrations.[923]

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.

In practice, UNHCR does not enjoy unhindered access to Removal Centres but has developed working modalities with PMM. In 2025, UNHCR is granted access to removal centres; however, these are scheduled meetings with officials to discuss the overall situation, rather than unannounced monitoring visits.[924]

TİHEK published reports in 2025 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, all unannounced, included: Antalya (13–14 June 2024, follow-up), where physical conditions remained problematic despite a prior 2021 visit, with overcrowding, broken sanitary fixtures, absent emergency call buttons, and missing medical equipment in the infirmary, alongside a number of longstanding recommendations, including initial health screening and a dedicated room for persons with disabilities, remaining unimplemented; Kütahya (22 August 2024, unannounced), a relatively newer facility opened in 2022, where conditions were generally adequate but the absence of a psychologist, insufficient hygiene supplies, and a lack of sports equipment were noted; Çankırı (17 December 2024, unannounced), the largest of the three facilities with a capacity of 750, where serious structural deficiencies were documented including water leakage causing electrical failures throughout the containerised accommodation, inadequate heating, persistent pest infestations, an average detention duration of 158 days with 291 persons held beyond six months, and significant shortcomings in health service delivery including the absence of intravenous supplies and proper medication storage; Malatya 1 No.lu (22–23 January 2025, unannounced), a male-only facility in Yeşilyurt holding 495 persons against a standard capacity of 400 across ten nationalities, predominantly Afghan, including 92 foreign terrorist fighter suspects, where overcrowding had resulted in floor sleeping arrangements, personal storage lockers were absent, laundry quality was poor, hygiene supplies were insufficient, emergency call buttons were lacking in rooms, and no courses had been operational since 2022 due to the failure of the Halk Eğitim Merkezi to assign instructors, with the average detention duration in 2024 standing at 187 days and 346 persons having been held beyond six months; and Şanlıurfa (12–13 May 2025, unannounced follow-up to a February 2024 visit), a mixed-gender facility with a capacity of 600 holding 555 persons from 14 nationalities including 28 accompanied children and 176 foreign terrorist fighter suspects, where a scabies outbreak was ongoing without adequate pharmaceutical treatment or isolation measures, strip searches were being conducted without privacy gowns and with curtains left open, toothpaste had been removed from hygiene kits on security grounds, rooms lacked emergency call buttons, the indoor sports hall remained out of service following the March 2023 flood, daily outdoor access was limited to approximately 20 minutes, telephone calls were capped at 10 minutes per day, and the disciplinary framework for persons under administrative detention remained without a legal basis, several recommendations from the prior visit,

923 X (formerly Twitter), Duygu İnegöllü, available here
924 Information provided by multiple stakeholders, February, March and April 2025.

including installation of emergency call buttons, camera blind-spot corrections in television rooms, and establishment of a library, having gone unimplemented.[925]

Civil society organisations have also published monitoring reports on removal centres during the reporting period. MAZLUMDER conducted a visit to Çatalca Removal Centre on 29 August 2025, following a suicide incident at the facility, and published its findings in September 2025; the delegation, comprising five lawyers and a teacher, assessed physical conditions, conducted interviews with detained foreigners, and reviewed operational documents. Mülteci-Der, published in September 2025 a report covering visits to İzmir Harmandalı Removal Centre conducted between April and June 2025, documenting persistent systemic issues including chronic overcrowding, inadequate medical care, procedural ambiguities, insufficient protections for vulnerable groups, heightened psychological distress among detainees, and a growing trend of indefinite detention without access to effective legal remedies.

UNHCR has access to removal centres, with prior notification and upon PMM's approval.[926] NGOs have no established protocols with PMM for access to Removal Centres. Regarding access to and contact with family members, practice varies across the centres.

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	☐ Yes	☒ No
❖ Pre-removal detention	☒ Yes	☐ No
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.[927] 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,[928] 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,[929] pre-removal detention must be reviewed by the governorate on a monthly basis.[930]

925 TİHEK, *Ziyaret Raporları*, available here.
926 Information provided by a stakeholder, March 2024.
927 Article 68(4) LFIP.
928 Information provided by stakeholders, May 2022 and March 2024.
929 Article 68(6) LFIP only states that detention may be lifted at any point.
930 Article 57(4) LFIP.

The decision to detain can be challenged before the competent Magistrates' Court through a non-suspensive appeal.[931] 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.[932]

According to lawyers' observations, poor quality of detention review by Magistrates' Courts persists as a problem. In the **İstanbul, Aydın, Hatay, Gaziantep, Adana, Kayseri** and **Erzurum** Removal Centres,[933] appeals against detention are rejected as a general rule.[934] In **İzmir**, **Van**, and **Edirne** there are increasing concerns about a 'systemic practice' of courts to reject administrative detention reviews, as the rejection rates increased in 2025.[935]

In 2024 and 2025, 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 Iğdır. 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.[936] 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 their eighth application to the court. In another case, a lawyer secured their client's release after ten months. There were several more positive examples after ten or eleven months of detention. Nevertheless, stakeholders emphasised that given the legal maximum duration of detention is 6+6 months, obtaining a release order only after 8 to 11 months does not make this legal procedure an effective remedy.[937] In 2025, challenges to administrative detention orders before criminal judgeships of the peace have remained largely ineffective in practice: releases ordered through such proceedings have been exceptionally rare during the reporting period, with no releases recorded across several detainee profiles. Cases have been documented in which individuals continued to be held in administrative detention notwithstanding clear legal grounds for release, including family ties, health conditions, supervision measures as alternatives to detention, and the best interests of children. There is a broad consensus among legal practitioners that criminal judgeships of the peace are rejecting petitions challenging administrative detention without substantive review.[938]

A further concern relates to cases where both a deportation order and an administrative detention order are in force. Although the Law on Foreigners and International Protection (Law No. 6458) contains no such requirement, requests for the termination of administrative detention, whether through judicial or administrative channels are in practice refused unless the underlying deportation order is also quashed.

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931 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.

932 Article 68(7) LFIP; Article 96(6) RFIP.

933 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.

934 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.

935 Information provided by stakeholder, March - April 2024.

936 Information provided by a stakeholder, February 2025.

937 Information provided by multiple stakeholders, May 2025.

938 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler*, 20 June 2026, available here.

The effective precondition that a deportation order must be annulled before release from a removal centre can be obtained has no basis in the legislation.[939]

Additionally, individuals against whom criminal investigations or prosecutions are pending are subject to automatic administrative detention orders. Magistrates' courts have been observed to disregard favourable outcomes in such proceedings, including decisions not to prosecute and acquittals, when adjudicating challenges to the associated detention orders.[940]

In 2025, an individual held at Adana RC had been subjected to a new administrative detention order issued immediately upon the expiry of the preceding twelve-month maximum detention period. Challenges were filed simultaneously before the Adana and Niğde criminal magistrates courts following a transfer to Niğde removal centre while proceedings were pending. The Niğde magistrates court ordered release, and the individual was released; accordingly, the Adana magistrates court subsequently issued a decision rejecting the challenge.[941]

In 2025, stakeholders reported that Istanbul Criminal Magistrates Court No. 1 was rejecting all challenges to administrative detention orders without exception, including cases where the criminal investigation or prosecution underlying the deportation order had been concluded in the individual's favour, whether through a decision not to prosecute or an acquittal. The court was observed to uphold detention orders even where the sole stated ground for deportation had ceased to exist as a matter of law.[942]

The case of an Uzbek refugee detained in a removal centre for over ten months illustrates the risk of arbitrary detention persisting in defiance of judicial oversight. The individual is a recognised international protection status holder who has resided legally in Türkiye for nineteen years, complies with regular reporting duties, and has serious health conditions. During his detention, the administrative court annulled the deportation order against him; he was not released, and a new deportation order was issued twenty days later. The Magistrates' Court subsequently lifted the administrative detention order on 12 January 2026. He was again not released, with the administration reportedly justifying this on the basis that a new detention order had been issued on 7 January 2026, prior to the court's decision. Stakeholders regard this sequencing as a deliberate circumvention of judicial oversight.[943]

One crucial gap in the LFIP provisions on detention concerns remedies against detention conditions.[944]

Finally, where administrative detention is unlawful, the applicant can lodge a compensation claim (*Tam Yargı Davası*) before the Administrative Court.[945] Nevertheless, based on administrative court decisions regarding compensation claims, the viability of this option remained highly questionable.[946] 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-

939 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler*, 20 June 2026, available here.
940 Istanbul Barosu Raporu.
941 Information provided by a stakeholder, November 2025.
942 Information provided by a stakeholder, February 2026.
943 X (formerly Twitter), YILMAZHalim, available here
944 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.
945 Constitutional Court, *B.T.*, Decision 2014/15769, 30 November 2017.
946 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.

set appears to normalise detaining a foreign national without a legal basis more readily than doing so to a citizen.[947]

As of June 2026, 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.[948]

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 the opportunity to meet with legal representatives, notary and UNHCR officials, if they wish so.[949] 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.[950]

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 themself, especially since the authorities do not provide information on the right to legal assistance in a language understood by the individual.[951] 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. Stakeholders in the field hightlight that no NGO has direct access to Removal Centres for the purpose of providing legal assistance.[952] This is even impossible in practice if the applicant is classified as a foreign terrorist fighter.[953]

In practice,[954] 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, 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 organisations 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.

947 Information provided by multiple stakeholders March and April 2025.
948 Information provided by a stakeholder May 2025.
949 Article 68(8) LFIP.
950 Article 81(2) LFIP.
951 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.
952 Information provided by a stakeholder, March 2024.
953 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.
954 Information provided by stakeholders, March – April 2024, Global Detention Project, *Türkiye: Submission to the Committee against Torture*, June 2024, available here.

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.[955] 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.[956]

In **Van**, officials in the administrative detention center are in charge of 'deciding' whether a person needs legal assistance or not. In 2025, while lawyers are appointed within the scope of UTBA in Van province, there are difficulties in appointments in Ağrı and Iğdır provinces.[957] 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.[958]

In 2025, 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.[959] 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. From January to September 2025, 1,112 individuals from RCs or TACs received legal assistance under UNHCR UTBA partnership. As previously noted, in 2025, 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.

Following the regime change in Syria in December 2024, and throughout 2025 and 2026, stakeholders observed that in line with the government's strong encouragement of returns to Syria, major actors such as UNHCR tended to direct more resources towards legal aid projects focused on return. While legal aid projects with that theme had unfilled quotas, those focused on administrative detention in particular continued to be oversubscribed.[960]

Ongoing visits by the Afghanistan Consulate to removal centres, particularly in Istanbul, have emerged as a notable issue in 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. According to the Istanbul Bar Association's report, consular officials are able to access the files of individuals under administrative detention more quickly and in greater detail than their lawyers, raising serious concerns regarding data security and confidentiality. Furthermore, instances have been observed where this situation

955 İzmir Bar Association, *İzmir 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.
956 Information provided by stakeholders, March – April 2024
957 Information provided by stakeholders, March 2024.
958 Information provided by a stakeholder, May 2023.
959 Information provided by stakeholders, March – April 2024.
960 Information provided by multiple stakeholders, March and April 2026.

is exploited in connection with release decisions: individuals for whom consular representatives indicate that release is appropriate are generally released, and the involvement of third parties who are able to secure a favourable consular opinion has resulted in Article 57/A of Law No. 6458, which governs the administration's discretionary release mechanism, being applied in a manner that undermines equality among individuals with similar profiles under administrative detention.[961]

UNHCR continued to run several workshops with removal centres, PMM, and bar associations[962] 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.[963]

E. Differential treatment of specific groups in detention

No policy regarding the differential treatment of detainees based on nationality was reported in 2025. In 2025, 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 (Harmandalı), 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). In 2025, stakeholders observed that individuals whose names appear on Interpol lists are subject to markedly harsher treatment within removal centres, irrespective of nationality. This includes a pattern of targeted placement in administrative detention, prolonged refusal to order release, and the application of solitary confinement measures within the facility.[964]

961 İstanbul Barosu, *Istanbul'daki geri gönderme merkezleri | 2025 yılına ilişkin gözlem ve tespitler*, 20 June 2026, available here.
962 İstanbul Barosu, *Uluslararası Koruma ve Mülteci Hukuku Eğitimi*, 29 January 2025, available here.
963 UNHCR, 'Türkiye Mayıs-Temmuz 2022', 2022, available in Turkish here & Information provided by a stakeholder, March 2024.
964 Information provided by a stakeholder, February 2026.

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 1(A)2 of the 1951 Convention and come from a "European country of origin"[965] 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.[966] In 2025, no information was shared.

2. Persons who fall within the refugee definition in Article 1(A)2 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 was no data shared in 2025, the latest number was roughly 2,000 conditional refugees in October 2021.[967]

3. Persons who do not fulfil the eligibility criteria for either refugee status or conditional refugee status but would be subjected to the death penalty or torture in their 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 conditional refugee status holders, subsidiary protection beneficiaries receive a lesser set of rights and entitlements 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 emphasise 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 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.

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965 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'.

966 QHA, 'Göç ve uyum konulu toplantıda Türkiye'deki göç olgusu anlatıldı', 17 March 2021, available in Turkish here.

967 QHA, 'Göç ve uyum konulu toplantıda Türkiye'deki göç olgusu anlatıldı', 17 March 2021, available in Turkish here.

Another possible reason is the difference in access to the labour market: while holders of subsidiary protection are exempt from applying for a work permit, conditional refugees are still required to obtain one.

In 2025, , Türkiye hosted around166,000 refugees and asylum seekers of various nationalities, primarily from Afghanistan, Iraq, and Iran. This includes 13,106registered refugees from Iraq and 9,872 from Afghanistan Additionally, there were 65,259 asylum seekers from Iraq, 58,406from Afghanistan and 5,836 from Iran.[968] In 2025, Türkiye recorded 31,583 displaced Ukrainians who applied for international protection.[969]

The Afghanistan 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 in urban areas, making minimal or no claims to rights or services.[970] Also in 2025, a growing number of Afghan nationals have been employed as shepherds in rural areas, a trend increasingly observed by stakeholders. The criteria governing their placement in such work remain discretionary and lack transparency.[971] Furthermore, the lack of consensus on the number of foreigners in Türkiye highlights the need for greater transparency and public dialogue on immigration issues.[972]

EU funding is almost exclusively allocated to Syrians (see Content of Temporary Protection), neglecting other groups. NGOs and civil society actors[973] who wish to support non-Syrians, especially Afghanistan nationals, must usually rely on their own resources. They are unsupported and underfunded by state and international bodies. Other issues regarding the funding[974] 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. After December 2024, in 2025 this trend intensified significantly. Funding and attention became concentrated almost exclusively on returns to Syria, reflecting the priorities of both governments and donors, with the result that the protection concerns of non-Syrians and Syrians alike were largely overlooked.

968 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here; PMM, *Statistics*, available here; UNHCR Türkiye, *Bi-Annual Factsheet*, September 2025, available here.
969 UNHCR, Ukraine Refugee Situation, available here; Ukrinform, *More than 31,500 Ukrainian citizens officially reside in Turkey*, 17 January 2025, available here.
970 GAR, October 2023, Actors and Mechanisms of (Non-)reception of the Afghans in Turkey GAR Report No. 9.
971 Information provided by multiple stakeholders, April 2026
972 Information provided by stakeholders, March – April 2024.
973 GAR, *Report No. 9, Actors and Mechanisms of (Non-)Reception of the Afghans in Turkey*, October 2023, available here.
974 Information provided by stakeholders, March – April 2024.

A. Status and residence

1. 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 permit. There are 6 types of residence permits available to foreign nationals.[975] 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 as "exempt from the residence permit requirement" that applies to other categories of foreign nationals.[976] They are instead envisioned to stay in Türkiye on the basis of open-ended international protection status documents. The International Protection Status Holder Identification Document 'shall substitute a residence permit' for the person concerned in the sense of authorising legal stay in Türkiye.[977]

Prior to 24 December 2019, refugees were granted an International Protection Status Holder Identification Document with a validity period of 3 years,[978] conditional refugees and beneficiaries of subsidiary protection were issued a document valid for 1 year.[979] Since then, people granted conditional refugee, subsidiary protection and international protection status are issued an identity document including foreign identity number.[980] The law states that the duration of validity of these documents, along with the rules on format and content, is to be determined by the Ministry of Interior.

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.

975 Article 30(1) LFIP.
976 Article 20(1)(g) LFIP, citing Article 83; Article 93(2) RFIP.
977 Article 83(3) LFIP.
978 Article 83(1) LFIP.
979 Article 83(2) LFIP.
980 Article 83 as amended by 85 7196 Law, 24 December 2019.

Although it is not included in the international protection chapter of the LFIP, humanitarian residence permits are frequently sought in practice by individuals who have been unable to access international protection. Among the legal grounds for this permit are cases where a foreign national must be allowed to enter or remain in Türkiye for urgent reasons or for the protection of national interests, public order, or public security, yet is precluded from obtaining any other type of residence permit due to disqualifying circumstances, as well as cases involving exceptional situations.[981] In practice, the granting of this permit is subject to a high degree of administrative discretion by PMM. As this permit does not carry non-refoulement protection and does not entitle holders to access healthcare, stakeholders expressed concern that it has become a mechanism through which PMM diverts individuals with viable international protection claims away from the international protection procedure and towards a status that affords significantly fewer safeguards. According to stakeholders, in 2025 nationals of Egypt, Sudan, and Palestine, as well as Afghan nationals who had previously received rejection decisions on their international protection applications, were among those granted humanitarian residence permits. A dedicated unit within Istanbul PDMM is responsible for receiving and reviewing such applications.[982]

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 were updated is 1,877,269 in 2024 and 986,852 in 2023.[983] In 2025, this figure was not disclosed by PMM. In general, PDMM notifies those who do not live at their declared addresses that first their GHI will be deactivated then their IDS will be cancelled.[984] 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.[985]

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 is 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 Newborn Certificate *(Uluslararasi Dogum Kayit 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 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 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.

981 Article 46(1) of LFIP
982 Information provided by a stakeholder, April 2026.
983 PMM, *Faaliyet Raporu 2023*, available here.
984 Information provided by a stakeholder, May 2023.
985 Information provided by a stakeholder, March 2024.

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 for marriage: the couple must file a petition for marriage (*evlenme beyannamesi*), signed by both individuals applying to marry;
- Celibacy document/certificate of eligibility to marry 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.

Since May 2021, individuals under international or temporary protection have been able to apply for a certificate of eligibility to marry through the e-Devlet platform without attending a PDMM office in person. Approved applicants are notified by SMS and may download their certificate directly through the platform.[986] This document is in principle obtained from the applicant's country of origin authorities; in some cases, PMM refers individuals to their consular authorities for this purpose.

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 have been reported since 2022, including regarding marriage registration. In 2021, as part of his anti-migrant campaign, the Mayor of Bolu increased the cost of the marriage procedure – up to 100,000 TL (5,000 EUR) - for third country nationals.[987] The Turkiye Human Rights and Equality Body imposed a fine of 40,000 TL (2,000 EUR) on the Mayor of Bolu for the discriminatory practice.[988] Recently, a similar decision was taken by the Mayor of Afyonkarahisar Belediyesi, who increased the cost of the marriage procedure to 10,000 TL for third country nationals, while it is normally 400 TL.[989]

Where an individual arrives in Türkiye already married and wishes to have that marriage recognised, they may present their marriage certificate to the migration authorities, provided it has been validated through an internationally recognised authentication system such as apostille. Where no such document is available, the individual must bring an administrative action before the administrative court seeking the annulment of the migration authority's record of their civil status on the grounds of incorrect registration. Only upon obtaining a favourable court decision may the civil status entry be amended.In divorce proceedings, the family court relies on the records held by the migration authorities regarding the

986 PMM, Evlenme Ehliyet Belgesi Hakkında.
987 Hurriyet Daily News, 'Bolu mayor announces 'controversial' wedding fee tariffs', 13 November 2021, available here.
988 Sendika, 'Tanju Özcan'ın mültecilere yaptığı ayrımcılıktan dolayı Bolu Belediyesi'ne para cezası', 19 May 2022, available in Turkish here.
989 T.C.Afyonkarahisar Belediyesi, X account, 2 May 2024.

individual's civil status and does not independently investigate whether a marriage contracted prior to the individual's arrival in Türkiye was valid under the applicable law. 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.[990] In 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.[991]

Regional PDMMs process 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.[992]

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.[993] 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.

In practice, however, long-term residence permits are granted to certain nationalities. PMM's activity report reveals that specific eligibility conditions apply to Ahıska Turks, Uyghurs, and Turks from Greece and Bulgaria, including a requirement of entry into Türkiye before 1 January 2022, and references an objective of effectively identifying individuals of Turkish descent. Read alongside stakeholder observations, this indicates that certain Turkic nationalities benefit from a form of preferential treatment in access to long-term residence permits.[994]

990 Information provided by a stakeholder, April 2022.
991 Information provided by a stakeholder, April 2022.
992 Information provided by a stakeholder, May 2023.
993 RRT, Sığınma hukuk bülteni.
994 PMM, *Faaliyet Raporu 2025*, available here; Information provided by multiple stakeholders, April and May 2026.

4. Naturalisation

Indicators: Naturalisation	
1. What is the waiting period for obtaining citizenship?	5 years
2. Number of citizenship grants to beneficiaries in 2025	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 the 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 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.

Marriage to a Turkish citizen: If the marriage of the applicant lasts 3 years and is effective, the applicant can acquire citizenship. However, the applicant needs to be 'cleared' by a security investigation. 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.[995] It was explicitly stated that this requirement excludes individuals without a legal basis of residence in Türkiye.

b. 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.[996] 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.[997] 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.[998]

995 Medyascope, İçişleri Bakanlığı yabancı uyrukluların evlenmesine "kalış hakkı" zorunluluğu getirdi, 27 June 2024, available here.
996 Mıhcı Law Office, 'Yatirim Yoluyla Türk Vatandaşliği', last accessed 25 July 2024, available in Turkish here
997 Ibid.
998 Finans Gündem, 'Vatandaşlığı en ucuza satan 3 ülkeden biriyiz', 10 May 2022, available in Turkish here.

TUIK announced that Foreigners have preferred to buy properties mostly from Istanbul, Antalya and Ankara. In 2025, housing sales to foreigners decreased by 9.5% compared to the previous year, with 21,677 units. İstanbul ranked first in with 8,416 units sold, followed by Antalya with 8,223 units, and Mersin with 2,112 units. Citizens of the Russian Federation purchased the most houses from Türkiye in 2025, buying 3,649 units. They were followed by Iranian citizens, who bought 1,878 houses; Ukrainian citizens, who bought 1,541 houses; and Iraqi citizens, who bought 1,292 houses.[999]

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 to non-Syrian nationals under international protection in practice as the exceptional naturalisation mechanism has been observed to apply exclusively to temporary protection holders and has not been extended to those under international protection status. In 2025, no data on the numbers of non-Syrians nationals obtain Turkish nationalities was made available.[1000]

The precarious nature of citizenship obtained through exceptional circumstances was illustrated by the case of Taha Elgazi, a Syrian refugee rights defender who had been granted Turkish citizenship. In May 2025, Elgazi was detained at his Istanbul home under the pretext of an address verification check by plainclothes police officers, transferred successively to Arnavutköy and Aydın removal centres, and subsequently sent to Syria together with his wife after signing voluntary return documents, whose citizenship was also revoked. Elgazi reported that an administrative restriction code, G-207, corresponding to participation in provocative acts, had been applied to his file.[1001]

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:[1002]

a. Voluntarily re-avails themself of the protection of their country of origin;
b. Voluntarily re-acquires the nationality of the country they have 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 themselves 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.[1003]

999 Ibid.
1000 DW, *İçişleri Bakanı: 238 bin 55 Suriyeli Türk vatandaşı oldu*, 17 December 2023, available here.
1001 Bianet, 'Adres teyidi' denilerek gözaltına alınan Taha Elgazi ve eşi sınır dışı edildi, 20 May 2025, available here.
1002 Article 85(1) LFIP.
1003 Article 85(2) LFIP.

Subsidiary protection may also be ceased where circumstances have changed to such an extent that protection is no longer needed.[1004]

Cessation is to be decided on an individual basis.[1005] 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.[1006] 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.[1007]

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.[1008]

According to stakeholders, in 2025 a significant number of Iranian nationals who had been granted international protection status, primarily as conditional refugees, had their status ceased on the grounds that they no longer required international protection. The cases were observed predominantly in Istanbul and Van, and largely concerned individuals whose international protection claims had been based on religious grounds, particularly conversion to Christianity. Cessation notices were served through UETS (Ulusal Elektronik Tebligat Sistemi the National Electronic Notification System), and due to limited digital literacy among the affected population, many individuals missed the applicable appeal deadline. Those who were engaged with NGOs were able to appeal in time, as their cases were being monitored regularly. Stakeholders highlighted this as a telling example of the critical role NGOs play in ensuring refugees in Türkiye are able to exercise their legal rights in practice.[1009]

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.[1010]

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,[1011] the

1004 Article 85(3) LFIP.
1005 Article 97(3) RFIP.
1006 Article 85(4) LFIP.
1007 Article 97(1) RFIP.
1008 Article 80(1)(a) LFIP.
1009 Information provided by multiple stakeholders, April and May 2026.
1010 Article 86(1) LFIP.
1011 Article 86(2) LFIP.

possibility to submit oral or written observations "within a reasonable period" is provided in the RFIP.[1012] 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,[1013] 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.[1014] Refugees and subsidiary protection holders are expressly exempt from this condition, but conditional refugees are not.[1015]

A refugee or beneficiary of subsidiary protection may reunite with the following family members:[1016]

- ❖ Spouse, whereby only one spouse may benefit from family reunification in the case of polygamous marriages;[1017]
- ❖ Minor children or minor children of the spouse;
- ❖ Dependent children or dependent children of the spouse.

The Türk Kızlay had received 110 requests for family reunification as of December 2022, but only 9 instances were satisfactorily handled back then. 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. and Legal clinics supported by UNHCR and NGOs provide legal support for family reunification cases. In 2025, no public data was shared.

Unaccompanied minors face numerous challenges during the family reunification process.[1018] 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

1012 Article 98(1) RFIP.
1013 Article 34(1) LFIP; Article 30(1)(d) RFIP.
1014 Article 35(1)(ç) LFIP.
1015 Article 35(4) LFIP.
1016 Article 34 LFIP; Article 30 RFIP.
1017 Article 34(2) LFIP; Article 30(3) RFIP.
1018 Refugee Solidarity Network and RRT, *Reuniting Families: Opportunities and Challenges for Refugees in Turkey*, December 2024, available here.

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.[1019] Holders of this permit have access primary and secondary education institutions without obtaining a student residence permit.[1020]

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.[1021] However, this condition may be waived in cases where the spouse has been a victim of domestic violence,[1022] or in the event of death of the sponsor.[1023]

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.[1024] While LFIP makes no reference to refugees, who should enjoy freedom of movement across the territory 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."[1025]

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.[1026]

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

1019 Article 34(1) LFIP.
1020 Article 34(4) LFIP.
1021 Article 34(5) LFIP.
1022 Article 34(6) LFIP.
1023 Article 34(7) LFIP.
1024 Article 82(1) LFIP; Article 110(4) RFIP.
1025 Article 110(5) RFIP.
1026 Article 110(1) RFIP.

Convention.[1027] 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.[1028] 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" (*Yabancılara 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.[1029] As of 2025, no such documents had been issued to any other individuals.

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.[1030] The final decisions on resettlement are taken by the receiving countries.

In 2022, due to the great demand, UNHCR expanded its resettlement team, creating two new interview sites in Istanbul and Gaziantep, and has been exploring additional complementary options for refugees through labour mobility and educational opportunities. However, in 2025 and 2026, resettlement capacity was significantly reduced as a result of funding cuts. According to PMM statistics, as of June 2026, 73,273 Syrians had been resettled (since 2016) to the EU, USA, Canada, Australia, New Zealand, UK, Switzerland, and Norway.[1031]

1027 Article 104 RFIP.
1028 Article 84(2) LFIP; Article 104(2) RFIP.
1029 Information provided by a stakeholder, February 2025.
1030 Information provided by a stakeholder, May 2023.
1031 See PMM, Temporary protection, available here

According to the UNHCR, as of September 2025, 2,963resettlement submissions were made,. 2,276 refugees departed to third countries.[1032] This represents a significant decrease compared to 2024, when submissions numbered 11,000 and departures 6,800.

In 2025, 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 , beneficiaries of international protection are expected to secure accommodation through their own means in Türkiye, which is very challenging (see Reception Conditions: Housing and Temporary Protection Housing).

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.[1033]

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 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.[1034]

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.[1035] 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.[1036] Data on the matter has not been made public in 2025. 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

1032 UNHCR, *Bi annual fact sheet*, September 2025, available here.
1033 Article 89(4)(b) LFIP; Article 4 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
1034 Article 18 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
1035 Article 89(4)(a) LFIP; Articles 6 and 9 Regulation on Work Permit for Applicants for and Beneficiaries of International Protection.
1036 Refugees International, *I am only looking for my rights: Legal employment still inaccessible for refugees in Türkiye*, December 2017, available here, 5.

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 2025, 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).

Temporary Protection

Temporary Protection Procedure

The legal basis of the 2014 Temporary Protection Regulation (TPR) is Article 91 LFIP. Therefore, 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.[1037]

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.[1038] 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.[1039] The declaration decision shall foresee the scope of beneficiaries, the start date of the temporary protection regime and its duration, where necessary.[1040] 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.[1041]

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'.[1042] In such a case, the Presidency shall have discretion to determine the specifics of the treatment of existing registered temporary protection beneficiaries and measures to 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 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.

1037 Article 10 TPR.
1038 Articles 1 and 3 TPR.
1039 Article 9 TPR.
1040 Article 10 TPR.
1041 Article 11 TPR.
1042 Article 15 TPR.

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 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.[1043]

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.[1044] 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.[1045]

In some cases, PDMM referred these persons for a short-term visa and then a short-term residence permit.[1046] Health care and other benefits are not accessible free of charge on a short-term residence permit.

1043 Information provided by a lawyer of a Bar Association, March 2019.
1044 Zeynep Kivilcim, 'Lesbian, gay, bisexual and transsexual (LGBT) Syrian refugees in Türkiye', 2016, 29.
1045 Information provided by NGOs, March 2019.
1046 *Ibid*.

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.

People 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 nationals concerned by this provision was 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.[1047]

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: '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'.[1048]

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 to continue 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, they need 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.

1047 Information provided by a stakeholder, May 2022.
1048 T.C., Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya: "Göçü Kaynağında Durdurduk", 14.08.2024, available here.

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 they:[1049]

a. Leave Türkiye voluntarily;
b. Avail themself of the protection of a third country;
c. Are 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, they are 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 continue to monitor voluntary returns to Syria in a number of provinces through presence at PDMMs.[1050] UNHCR does not monitor all voluntary returns.

After December 2024, following the regime change in Syria,the programme, once referred as voluntary, safe and dignified returns, began to be referred to as the voluntary, safe, dignified, and regular return programme and continued to be a priority policy area for the PMM.[1051] In the initial days after the regime change, the number of returns increased significantly, reaching up to 1,000 individuals per day.[1052] As of June 2026 more than 700,000 syrians have returned to their countries since the regime change.

Following regime change on 8 December 2024, the pace of returns of Syrian nationals from Türkiye increased significantly. According to figures published by the PMM, 175,512 Syrians had returned by April 2025,[1053] rising to 250,064 by May 2025[1054] and reaching 509,387 by October 2025.[1055] By 8 December 2025, the first anniversary of the change of government in Syria, the total number of Syrians who had returned from Türkiye since that date stood at 578,000, bringing the cumulative total of voluntary returns for the period 2016–2025 to approximately 1,318,000.[1056] The figures indicate an initial surge in returns in the months immediately following December 2024, with numbers continuing to rise substantially through to October 2025, after which the pace of returns appears to have slowed. Stakeholders explain this trend by pointing to contact between people in Türkiye and those who have already returned to Syria. While the risk

1049 Article 12(1) TPR.
1050 Information provided by a stakeholder, March 2024.
1051 T.C. Göç İdaresi Başkanlığı, Gönüllü, Güvenli, *Onurlu ve Düzenli Geri Dönüş*, available here.
1052 Ali Yerlikaya, X (Twitter), 15.12.2024, available here.
1053 PMM, İçişleri Bakanı Ali Yerlikaya; "175 Bin 512 Suriyeli Kardeşimiz Gönüllü, Güvenli, Onurlu ve Düzenli Şekilde Ülkesine Döndü", 16 April 2025, available here.
1054 PMM, İçişleri Bakanı Ali Yerlikaya, 2016 Yılından İtibaren Ülkesine Gönüllü Geri Dönüş Yapan Suriyeli Sayısının 1 Milyona Ulaştığını Açıkladı, 28 May 2025, available here.
1055 PMM, Suriye'nin Özgürleşmesinden Sonra 509 Bin 387 Suriyeli Gönüllü Geri Dönüş Yaptı, 01 October 2025, available here.
1056 PMM, 8 Aralık 2024 Sonrası 578 Bin Suriyeli Ülkesine Döndü, 10 December 2025, available here.

of persecution has largely been eliminated for most groups, throughout 2025 the infrastructure outside Damascus remained inadequate for a viable life. Electricity is available only 3–8 hours a day, the job market is extremely narrow, and salaries are very low. Housing is largely damaged, yet rents remain high. There is also no legal certainty: someone wishing to invest in Syria, for example, by establishing a business such as a factory or hotel tied to a specific piece of land, faces the risk that, even if the current government encourages the investment, another party can later claim the land was illegally expropriated under the Assad regime and is therefore disputed. As a result, people with entrepreneurial potential are reluctant to return. Given this picture, those who have already rebuilt their lives in Türkiye, when given a genuine choice rather than being forced, tend not to choose to return.

According to information published by the PMM, the voluntary return procedure for Syrians under temporary protection operates as follows. A Syrian national wishing to return voluntarily must first obtain an appointment through the PMM's online appointment system, indicating at the time of booking the border crossing through which departure is intended. The individual must then present in person at the Provincial Directorate of Migration Management of the province in which they are registered, where fingerprint verification is conducted and a check is carried out through the UYAP system to determine whether any outstanding arrest warrant or restriction code is in place. The Voluntary Return Form is completed in the individual's own handwriting and signed while being recorded on camera. The form is co-signed by a third-party observer, a UNHCR representative, or in the absence of one, a Turkish Red Crescent official, a representative of the Provincial Human Rights Monitoring Commission operating under the Human Rights and Equality Institution of Türkiye (TİHEK) and the relevant governorship, or a civil society representative designated by the provincial governorship. Following completion of the form, a V-87 restriction code is entered and the individual is issued a Travel Permit valid for 15 days, authorising travel to the province of the designated border crossing. Upon arrival at the border, a further fingerprint verification is carried out; where individuals require accommodation pending completion of border formalities, placement in a temporary accommodation centre is available. This centre is not a closed facility; residents may leave during the day subject to permission. The individual's identity document is handed over to the border police and subsequently destroyed, and the temporary protection status is formally terminated on grounds of voluntary return. Voluntary returns are currently processed through Istanbul and Ankara international airports and through the land border crossings of Cilvegözü, Yayladağı, and Zeytindalı in Hatay; Öncüpınar and Çobanbey in Kilis; Akçakale and Ceylanpınar in Şanlıurfa; and Karkamış in Gaziantep.[1057] During the process, individuals receive counseling on voluntary return, and at the end of the procedure they are provided with financial support.[1058]

Mr. Yerlikaya emphasised 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 would be allowed to make up to three "go and see" visits between 1 January and 1 July 2025. This permission would 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

1057 PMM, Gönüllü Geri Dönüş, available here.
1058 UNHCR Türkiye, Yerinden Edilmiş Suriyelilerin Tarihi Dönüşü Fırsatlar ve Acil Zorlukları Beraberinde Getiriyor, 08 December 2025, available here.

two designated border gates.[1059] As of June 2025, 27,000 individuals were granted permission to make use of this opportunity.[1060]

As of 1 January 2025, “go and see” visits officially began, as previously noted (see Voluntariness of repatriation). 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 were 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.[1061]

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.[1062]

Field research conducted in Gaziantep and Hatay between January and June 2025 found that while the majority of GSV participants found the visits helpful in making informed decisions, the conditions encountered were largely adverse — characterised by destroyed infrastructure, economic hardship, and insecurity. Roughly equal proportions of participants reported being encouraged and deterred by what they observed. Overall, the majority of Syrians under temporary protection continued to refrain from permanent return, citing security concerns, housing shortages, poor services, and economic deprivation in Syria, alongside push factors in Türkiye including rising living costs and deteriorating socio-economic conditions.[1063]

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.[1064] 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.[1065]

1059 Anadolu Ajansı, İçişleri Bakanı Ali Yerlikaya, AA Editör Masası'nda soruları yanıtladı.
1060 Habertürk, İçişleri Bakanı Ali Yerlikaya Özel Röportaj'da Soruları Yanıtlıyor, 05 June 2025, available here.
1061 Information provided by multiple stakeholders February and May 2025.
1062 Reuters, ‘Hope turns to regret among Syrians returning home from Turkey’, 06 February 2025, available here.
1063 GAPS, ‘Between Choice and Constraint: Go-and-See Visits and Syrian Return from Türkiye’, 24 November 2025, available here.
1064 AP, ‘The warm Turkish welcome for refugees is ending and Syrians are worried’, 20 December 2024, available here.
1065 Information provided by a stakeholder, April 2025.

Available research and field evidence indicates that the majority of Syrians under temporary protection in Türkiye continue to approach permanent return with caution, notwithstanding the political transition in Syria following December 2024. The primary barriers identified include ongoing security concerns, widespread housing destruction, inadequate access to basic services, and limited economic opportunities in Syria. A February 2025 flash survey found that while 80% of Syrian refugees expressed a desire to return to Syria at some point, only 27% indicated an intention to do so within the next year, with housing availability, safety, and economic conditions cited as the main impediments.[1066] Field research further indicates that conditions encountered by those who have returned have often been severe: inadequate housing, limited access to clean water and electricity, disrupted education, particularly for children educated in Türkiye who have limited Arabic literacy and overstretched health services.[1067] An independent consultancy report published in December 2025 noted that at least half of the Syrian population that has settled in Türkiye is likely to remain permanently, and that large-scale returns are not anticipated in the near term without the establishment of economic support mechanisms in Syria. The same report highlighted that two distinct groups have driven the returns that have occurred: those pushed by increasingly difficult conditions in Türkiye, and those who were able to accumulate sufficient resources during their time in Türkiye to finance a return.[1068] Socio-cultural factors also play a significant role in shaping the decision to remain: women in particular have expressed reluctance to forgo the rights and social freedoms they have accessed in Türkiye, which they perceive as substantially curtailed or unavailable in Syria.[1069] A 2025 issue brief similarly found that conditions in Syria, rather than host-country hostility, constitute the primary determinant of return intentions, and that significant improvements in security and economic conditions would be required before the majority of Syrians would consider return as safe and desirable.[1070] The go-and-see visits implemented during the first half of 2025 appear to have reinforced rather than altered these patterns: among those who participated, conditions encountered in Syria led a significant proportion to reconsider permanent return, with field research indicating that the visits had a mixed effect, roughly equal proportions reporting being encouraged and deterred, while the structural barriers to sustainable reintegration remained largely unaddressed by the visits alone.[1071]

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 notarised 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 authorised 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 recognised in the country. The court ruled that there

1066 EUAA, '4.2. Return trends' in COI Report - Syria: Country Focus, July 2025, available here.
1067 BBC Türkçe, Suriye'ye geri dönenler: 'Yine sıfırdan başlıyoruz ama artık mülteci değiliz', 08 December 2025, available here.
1068 BBC Türkçe, Suriye'ye geri dönenler: 'Yine sıfırdan başlıyoruz ama artık mülteci değiliz', 08 December 2025, available here.
1069 Agora Derneği, *Syrian refugees in Turkey: Current Situation, Return Dynamics, And Social Cohesion*, November 2025, available here.
1070 Baker Institute for Public Policy, *Syrian Refugees in Türkiye: Prospects for Return or Integration?*, 22 April 2025, available here
1071 GAPS, Between Choice and Constraint: Go-and-See Visits and Syrian Return from Türkiye, 24 November 2025, available here

was no need to decide on custody because, under Turkish Civil Law, custody automatically belongs to the mother.[1072]

In 2025, in recognition of the legal barriers faced by individuals seeking to return to Syria with children in the absence of the other parent, a legal aid project was jointly developed and implemented covering 62 bar associations across Türkiye. The project is designed specifically to address family law obstacles arising in the context of voluntary return, including consent, custody, and guardianship procedures.[1073] Access to the project is, however, conditioned on referral from a PDMM; referrals from civil society organisations or direct applications by individuals are not accepted. This design reflects a deliberate policy choice to restrict eligibility to individuals whose return intention has been verified by the authorities. As of February 2026, only 12 appointments had been made from four provinces, against a total capacity of 2,400 appointments over a three-year period. The extremely low uptake is attributed in part to the referral condition itself, which significantly narrows the pool of eligible applicants. The project design has also drawn broader criticism: by conditioning legal aid on a PDMM referral rather than on protection need, the project is seen as prioritising the facilitation of returns over the provision of legal assistance to individuals with outstanding protection concerns, regardless of their intention to return.[1074]

Reports of forced returns

Reported practices of coercion in voluntary return proceedings involving Syrians, including the use of pressure to obtain signatures on voluntary repatriation forms in removal centres, are documented in earlier editions of this report (See: AIDA Türkiye 2024 Report). In 2025, such practices were not observed with respect to the Syrian population. Following the regime change in Syria in December 2024, the profile of Syrians held in administrative detention changed significantly, with the number of Syrians placed in RCs declining markedly. Among the limited number of Syrians who were taken into administrative detention during 2025, stakeholders noted a tendency to opt for voluntary return within a matter of days, particularly where release had not been ordered, rather than engage with the procedural requirements of challenging an administrative detention or deportation order through the removal centre system. Stakeholders reported that, although less widespread than in previous years, removal centre staff continued in 2025 and 2026 to provide misleading information to Syrian detainees in order to induce voluntary return decisions, including by falsely stating that individuals would be unable to leave the facility for at least one year.

Factors shaping return decisions

More than eighteen months after the political transition in Syria in December 2024, a clearer picture has begun to emerge regarding the motivations behind Syrian return decisions. While the Turkish government has continued to publish weekly return figures, the rapid pace observed immediately following the regime change has visibly slowed. Syrians remaining in Türkiye are increasingly making return decisions based on direct accounts from friends and relatives who have already gone back, using these informal networks to assess conditions on the ground before committing to a decision.

According to stakeholders, the absence of political persecution is no longer sufficient on its own to prompt return. Syrians report that they are unable to meet their basic needs in Syria due to severe infrastructural deficiencies: electricity supply outside Damascus remains limited to between three and eight hours per day, access to healthcare is nearly non-existent, rental costs are prohibitively high relative to living conditions,

1072 Information provided by multiple stakeholders, February, March, April and May 2025.
1073 UTBA, *Gönüllü geri dönüşler için adli yardım çevrimiçi eğitimi*, 10 November 2025, available here.
1074 Information provided by multiple stakeholders, March and April 2026.

and employment opportunities are virtually absent. These material conditions are cited as the primary reasons why many choose to remain in Türkiye regardless of the changed political environment.[1075]

A further factor shaping return decisions is generational attachment. A significant proportion of Syrian families have children who were born or raised in Türkiye and who speak Turkish more fluently than Arabic. These children have limited or no personal connection to Syria, and their families, irrespective of their legal status in Türkiye, are accordingly oriented towards building a future in the country where they have established their lives. This generational dimension represents a structural factor that is likely to weigh heavily on return decisions in the coming years.[1076]

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.[1077] However, this policy has changed for holiday permits granted to Syrians during religious holidays: since 2022, 'holiday permits' are not given to Syrians.[1078] Following the February 2023 earthquakes, Syrians registered in the ten most severely affected provinces were permitted, on an exceptional basis, to make temporary visits to Syria between February and December 2023 without losing their temporary protection status, with reports indicating that the large majority subsequently returned to Türkiye.[1079]

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.[1080] 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.[1081] 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.[1082]

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.[1083] PMM statistics refer to

1075 Information provided by multiple stakeholders, February, March, April 2026.
1076 Information provided by multiple stakeholders, March and April 2026.
1077 Information provided by a stakeholder, May 2023.
1078 Hürriyet, 'Bayrama giden kalacak', 2022, available here & information provided by stakeholders, March – April 2024.
1079 Information provided by stakeholders, March and April 2024.
1080 Article 13 TPR.
1081 PMM Circular 2019/1 on Cessation of Status of Syrians due to Voluntary Return, 7 January 2019.
1082 Information provided by a stakeholder, May 2023.
1083 Provisional Article 1(6) TPR, as inserted by Article 1 Regulation 2016/8722 of 5 April 2016.

412 Syrian "irregular migrants" readmitted by Türkiye from 4 April 2016 to 5 April 2021 – an increase of 8 persons in 2020.[1084] These returns were still suspended in 2025 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

The following categories of persons are excluded of benefitting from temporary protection in Türkiye:[1085]

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.

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.[1086] In some cases, PMM has also ordered cancellation on the basis of Article 8(1)(e) TPR.[1087] 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 is seen as providing misleading information to PMM.[1088]

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.[1089]

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.

1084 PMM, *Return statistics*, available here.
1085 Article 8(1) TPR.
1086 Information provided by various stakeholders, May and June 2023.
1087 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.
1088 Information provided by a stakeholder, May 2023.
1089 Article 12(2) TPR.

Beneficiaries of temporary protection were not informed by the authorities of the cancellation of their protection in 2025 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.[1090] Stakeholders reported that temporary protection statutes 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 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 emphasised 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.[1091] 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.[1092] In 2025, the practice of cancelling temporary protection status on minor or disproportionate grounds was observed to continue, albeit to a lesser extent. Stakeholders noted that while this practice does not involve the direct physical coercion associated with removal centre proceedings, it effectively compels individuals to return by stripping them of their legal status and the rights attached to it, leaving them with no viable alternative to departure.[1093]

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.[1094]

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.[1095] In 2025, as public attention shifted towards voluntary, safe, dignified and regular returns to Syria, address verification cancellations were no longer a priority concern on the policy agenda;

1090 Information provided by stakeholders, March – April 2024.
1091 Information provided by a stakeholder April 2025.
1092 Mazlumder, *Göç Politikasını Beraber İyileştirelim!*, 20 June 2025, available here.
1093 Information provided by multiple stakeholders, February and March 2026.
1094 Independent Turkey, *İçişleri Bakan Yardımcısı Çataklı: Suriyeli mültecilerden 122 bini kayıp*, 22 June 2022, available here.
1095 T.C. İstanbul İl Göç İdaresi Müdürlüğü, İçişleri Bakanı Ali Yerlikaya, *Adres Tahkikatlarından Sonra Suriyelilerin Sayısının 2 Milyon 935 Bin 742'ye Düştüğünü Açıkladı*, 20 November 2024, available here.

however, individuals whose registrations had previously been deactivated continued to face difficulties in reactivating their status and accessing services. No official data on address verification outcomes were made publicly available for 2025 or 2026.

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

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.[1096]
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".[1097] 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.[1098] In 2019, Türkiye opened the "Olive Branch" border-crossing point in Afrin, reinforced with new technology.[1099] In 2020, Türkiye began using surveillance balloons to patrol the border.[1100]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,[1101] or to bribe border guards to enter Türkiye.[1102] There are also reports of tunnels and that the wall has increased smugglers' prices.[1103] PMM figures for 2024 refer to a total of 225,831 apprehended irregular migrants countrywide, of whom only 50,641 were Syrian nationals.[1104] As of 20 August 2025, passport-based entry and exit at Turkish land border crossings with Syria became available as part of the normalisation process following the political transition in Syria in December 2024. Turkish citizens and Syrian nationals who have acquired third-country citizenship may use all land border crossings, with the exception of crossings located within the Operation Peace Spring movement zone.[1105]

1096 Article 17(2) TPR.
1097 Article 15 TPR.
1098 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.
1099 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.
1100 Middle East Monitor, 'Türkiye to open border gate with Syria's Afrin next week – minister', 5 March 2019, available here
1101 Hürriyet, 'Footage shows Syrians scaling Turkish border wall with ladders', 7 September 2018, available here.
1102 International Crisis Group, *Mitigating Risks for Syrian Refugee Youth in Türkiye's Şanlıurfa*, February 2019, available here, 5-6.
1103 Information received from stakeholders from Ankara and Şanlıurfa, March 2020.
1104 PMM, *Irregular migration statistics*, available here.
1105 PMM, Suriye'ye Pasaportla Geçiş, 20 August 2025, available here.

Allegations of pushbacks and violence at the Turkish-Syrian border, including documented incidents of unlawful deportations carried out without individual assessment and reports of border forces using lethal force against irregular crossers, are addressed in detail in previous editions of this report and in the Access to Territory and Pushbacks section (See: AIDA Türkiye 2024 Report). In 2025, in the context of the political transition in Syria and the corresponding shift in Turkish authorities' approach toward the Syrian population, stakeholders observed a marked reduction in such practices during the reporting period.[1106]

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 cases (family reunification, access to treatment, having a work permit, vulnerable groups). 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. In 2025 and 2026, stakeholders reported that access to registration in Istanbul became comparatively easier than in the preceding year, with authorities continuing to require justification under the existing exceptions but applying them less strictly in practice.[1107]Stakeholders also reported that the deconcentration policy applicable to Syrians had been eased in practice in 2026; however, no official public announcement confirming this change had been made as of June 2026.[1108]

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.

1106 Information provided by multiple stakeholders, February and March 2026.
1107 Information provided by a stakeholder, June 2026.
1108 Information provided by a stakeholder, June 2026.

PDMM issues a decision on an individual basis if the applicant is assessed to be excluded from temporary protection.[1109]

In 2025, 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 2,347,756 people registered under temporary protection. As of 02.07.2026 there are 2,251,509 people registered under temporary protection.[1110] This is a decrease of 649,969 compared to 2024, more than700,000 since 8 December 2024. The decline in the number of temporary protection holders is attributable primarily to the regime change in Syria and the willingness of a significant portion of the population to return to their country of origin, reinforced by both national and international discourse encouraging returns. However, stakeholders widely reported that throughout 2025 and 2026, temporary protection holders who approached PDMMs for matters unrelated to return were nonetheless directed towards voluntary return counselling by PDMM officials.[1111]

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.[1112]

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 designing 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.[1113]

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.[1114] 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.

1109 UNHCR, *Registration with the Turkish authorities*, available here.
1110 See PMM website, 'Temporary Protection', available in English here.
1111 İstanbul Barosu, *Dünya Mülteciler Gününde Avukatlığı Savunuyoruz*, 20 June 2026, available here.
1112 Turkish Government, *Mahalle Kapatma Duyurusu Hk.*, available here.
1113 Information provided by a stakeholder, May 2023.
1114 PMM Circular 2017/10 of 29 November 2017 on principles and procedures for foreigners under temporary protection.

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.[1115]

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 Administrate 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.[1116]

In a decision dated 31 October 2025 Istanbul 15th Administrative Court annulled the implicit rejection of a Syrian national's application for the reinstatement of temporary protection status in Istanbul. The applicant's temporary protection registration in Istanbul had been cancelled by the administration in January 2023; a court had subsequently annulled that cancellation decision in January 2024, and the annulment was upheld on appeal. Following the finalisation of the annulment, the applicant applied for the reinstatement of the Istanbul registration, but the administration implicitly rejected the application on the grounds that the applicant held a registration in Kilis province and that Istanbul was closed to new temporary protection registrations. The court held that an annulment decision by an administrative court operates retroactively, restoring the legal situation as it existed prior to the impugned act. Accordingly, since the cancellation of

[1115] PMM Circular 2017/10 of 29 November 2017 on principles and procedures for foreigners under temporary protection.

[1116] T.C. İstanbul 15. İdare Mahkemesi, 2024/526 E., 2024/3653 K., 13.06.2024.

the Istanbul registration had been annulled with retroactive effect, the administration was under an obligation to reinstate the temporary protection status in Istanbul and could not refuse to do so by reference to the closure of Istanbul to new registrations, a closure that was irrelevant where the reinstatement was required as a consequence of a binding judicial decision rather than constituting a new registration.[1117]

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, İstanbul 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.[1118]

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 Yardim*) 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). 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.[1119] This project becomes an important support especially for determination of paternity in case of lack of official birth certificates[1120]. 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 project, the National Voluntary Return Mechanism Strengthening Project (GGD Gönüllü, Güvenli, Onurlu ve Düzenli Dönüşler), was launched in late 2025 in partnership with UNHCR and the Union of Turkish Bar Associations (UTBA) and remained active in 2026. The project engages 64 bar associations and is designed exclusively to address the legal needs, primarily custody-related issues, of individuals wishing to return to Syria. Access to the project is conditional on the individual first approaching a PDMM office, which must confirm the need and formally refer the case before a legal aid appointment can be made. As of February 2026, only 12 appointments had been made out of a quota of 2,400. Stakeholders expressed concern that the PDMM referral requirement undermines the civil character of legal aid. The project has also drawn criticism on the grounds that allocating resources of this scale exclusively to return-

1117 T.C. İstanbul 15. İdare Mahkemesi, 2025/1261 E., 2025/5139 K., 31.10.2025.
1118 T.C. İstanbul 18. İdare Mahkemesi, 2025/1799 E., 2025/2156 K. 08 May 2025.
1119 TBB, *Deprem sonrası hukuki güçlendirme, yardım ve koruma programı avukatlara yönelik çevrimiçi eğitim 08 şubat 2025*, 31 January 2025, available here.
1120 Information provided by stakeholders, March – April 2024.

related needs, at a time when other protection needs remain unmet, reflects a political rather than a needs-based prioritisation of legal aid funding.[1121]

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 not[1122].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.[1123] In 2025, 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.

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.

1121 Information provided by multiple stakeholders, March and April 2026; TBB, Gönüllü geri dönüşler için adli yardim çevrimiçi eğitimi, 10 November 2025, available here.
1122 RRT & Refugee Solidarity Network, *Information portal for refugee in Turkey*, available here.
1123 Information provided by a stakeholder, May 2022.

In 2025, conditions in certain temporary accommodation centres, including Arnavutköy, amounted to de facto detention of Syrian nationals. Individuals were prevented from leaving the premises even temporarily, their mobile phones were confiscated, and no formal administrative detention decision was recorded in their files (See: Detention Without Legal Basis).

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;[1124] protection from punishment for illegal entry or presence[1125] and protection from *refoulement*.[1126]

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, as integration became a focal point of debate.[1127] This period saw increased migration to 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 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.[1128] 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 was due to end in 2023, UNHCR collaborated with PMM on the drafting of its revised Strategy and National Action Plan.[1129] In 2023, the policies overlooked social cohesion, and instead prioriy were given to (voluntary) return, border management, effective detection of irregular migrants within the country, and deportation. Since December 2024, the main policy focuses on voluntarily, safe, dignified and regular returns.[1130] Throughout 2025, public debate on the future of the temporary protection regime remained largely absent, as the armed conflict that originally underpinned the mass displacement from Syria is no longer an active consideration in policy discussions. Official statements on the Syrian population centred predominantly on return figures and reconstruction efforts in Syria, with little attention given to the question of those choosing to remain in Türkiye.[1131] As of early 2026, civil society organisations have begun to initiate discussions on the legal future of the remaining Syrian population, including the adequacy of the temporary protection framework and the case for alternative legal statuses.[1132]

The rise of anti-immigrant sentiment has often been 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.[1133]

1124 Article 25 TPR.
1125 Article 5 TPR.
1126 Article 6 TPR.
1127 Içduygu, Ahmet and Simsek, Dogus (2016) Syrian refugees in Türkiye: towards integration policies. *Turkish Policy Quarterly*, 15(3), 59-69, available here.
1128 SGDD-ASAM and UN Women, *Needs assessment of Syrian women and girls under temporary protection status in Türkiye*, June 2018, available here, 65.
1129 UNHCR, Türkiye Factsheet, September 2023, available here.
1130 T.C. Göç İdaresi Başkanlığı, Gönüllü, Güvenli, Onurlu ve Düzenli Geri Dönüş.
1131 T.C. İstanbul Valiliği İl Göç İdaresi Müdürlüğü, Cumhurbaşkanı Recep Tayyip Erdoğan: "Son Bir Yılda 600 Bin Suriyeli Misafirimiz Vatanlarına Dönmüştür.", 31 December 2025, available here.
1132 ULFED, *ULFED ve MEDAR İş Birliğiyle "Geçici Korumanın Geleceği ve Alternatif Hukuki Statüler" İstişare Toplantısı Gerçekleştirildi*, 21 January 2026, available here; GAV, *Policy Report: Beyond the Temporary Protection Regime: Alternative Policy Options for Syrians in Türkiye,* June 2026, available here.
1133 Evren Balta Ezgi Elçi Deniz Sert, *Political Party Representation of Anti-Immigration Attitudes: The Case of Turkey*, December 2022, available here.

After the 2024 elections, and especially after the regime change in Syria in December 2024, public interest in refugees declined rapidly. This is particularly notable given that in July 2024, widespread unrest, known as the Kayseri incidents broke out following allegations against a Syrian man, during which protestors raided the homes of Syrian families, set vehicles on fire, and engaged in acts of violence. Despite this level of hostility just months earlier, 2025 saw a marked decline in public visibility of anti-migrant sentiment. Stakeholders suggest this may be because the earlier discourse was an artificially manufactured political agenda, which lost momentum once the regime change in Syria offered faster returns and left little left to inflame. However, the reduced visibility of refugees in public life, following the strict forced returns, interruptions to healthcare access, and limited access to registration applied until 2024, may also have played a role.

For a detailed explanation of the events: See AIDA Türkiye 2024 Report.

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.[1134]

EU funding projects in Türkiye[1135]

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 Turkiye to ensure the delivery of cross-border aid to Syria.[1136] 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.[1137] In 2025, the EU allocated a further €20 million in humanitarian aid for vulnerable refugees and host communities in Türkiye, down from €26 million in 2024, primarily Temporary Protection holders, prioritising protection, basic needs assistance, health and education, with the funding to be implemented through EU humanitarian partners in close coordination with national authorities.[1138]

The overall EU support to refugees in Türkiye for the period 2020–2027 amounts to €6 billion, of which €5.88 billion has been committed, €4.63 billion contracted, and €3.31 billion disbursed as of March 2026.[1139] Funded projects have not been designed with refugee participation, nor have refugees been meaningfully consulted to identify community priorities in project design.[1140]

Funding trends reflect a sustained decline in humanitarian assistance over the period. Humanitarian funding dropped significantly, from EUR 43 million in 2022 to EUR 13 million in 2024, reflecting a shift away from emergency humanitarian response toward longer-term development and migration management

1134 Mülteciler Derneği, *2025 Saha Gözlem Raporu: Suriye "Esad gitti ama Suriye hala karanlık."*, 11 March 2025, available here.

1135 This section is based on the information from several resources: DG NEAR, *EU Support to Refugees in Türkiye*, available here & European Commission, *Seventh Annual Report of the Facility for Refugees in Turkey*, COM(2023) 543 final, 22 September 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*, 24 April 2024, available here.

1136 AA, 'EU pledges over $2B at donors conference for Syria', 15 June 2022, available here.

1137 European Commission, 'Commission signs €400 million agreement with Türkiye to support its recovery after the 2023 earthquakes', 07 February 2024, available here.

1138 European Commission, 'EU will provide €20 million in humanitarian aid for vulnerable refugees and host communities in Türkiye in 2026', 11 June 2026, available here.

1139 European Commission, *EU Support to Refugees in Türkiye (2020–2027): List of Projects Committed, Contracted, Disbursed*, updated 31 March 2026, available here.

1140 Information provided by multiple stakeholders, March and April 2026.

instruments.[1141] In 2024, this downward trend was confirmed, driven in part by Türkiye no longer being considered a priority context by several donors amid competing global crises (See AIDA Türkiye 2024).

Two further developments accelerated this decline into 2025: the regime change in Syria in December 2024, which altered international assessments of protection needs and return conditions, and executive decisions by the second-term Trump administration that disrupted USAID and PRM funding streams. The 2025–2027 EU allocation of €1.5 billion, of which €40 million is designated for humanitarian assistance in 2025, signals a continued reorientation of EU support toward development assistance, socio-economic integration, and migration management rather than direct protection and humanitarian response.[1142]

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. In 2025, two Migrant Health Centres closed and two new Migrant Health Units opened in 13 provinces.[1143]

The EU Support to Refugees in Türkiye Programme has continued to deliver significant results in education and municipal infrastructure. In education, EU funding has supported the construction of 196 schools cumulatively, including 20 newly built and operationalised facilities in 2024 and 2025, creating over 150,000 additional student places across high-refugee-concentration and earthquake-affected provinces. In terms of municipal services, the Programme has expanded water supply, sanitation, and solid waste management capacity in provinces facing heightened demand due to the presence of large refugee populations. Notable milestones during the reporting period include the provisional acceptance of the Birecik Sewerage Networks and the Alleben Left Shore Collector Line in Gaziantep, as well as the near-completion of the Northern Districts Integrated Solid Waste Project in Kahramanmaraş and the commencement of construction on the Viranşehir–Ceylanpınar Integrated Solid Waste Management Project in Şanlıurfa. The target of 23 sports and recreational facilities has been fully achieved, with 11 new facilities completed during the reporting year, providing safe communal spaces that contribute to social cohesion between refugees and host communities. These investments have collectively improved living conditions and access to essential services for both refugees and host community members in the provinces most affected by the presence of large refugee populations and the 2023 earthquakes.[1144]

1141 EU Facility for Refugees in Türkiye, *The Facility Results Framework Monitoring Report No. 13*, December 2024, available here.
1142 EC, List of Projects Ibid.
1143 EU Facility for Refugees in Türkiye, *The Facility Results Framework Monitoring Report No. 14*, 22 January 2026, available here.
1144 European Commission, *14th Facility Results Framework Monitoring Report (as of 30 June 2025)* and Annex, 22 January 2026, available here.

E. 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 defined by international institutions and organisations.[1145] 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,[1146] and Syrians that are under temporary protection shall be deported if they do not comply with their notification duty three times consecutively.[1147]

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. According to PMM, as of June 2026, a total of 1,440,123 Syrians have voluntarily returned to Syria since 2016, of whom 700,120 did so following the change of regime on 8 December 2024.[1148]

Stakeholders expressed concerns regarding whether they are voluntary or forced returns. Coercive 'voluntary' return practices documented prior to December 2024 are addressed in previous AIDA reports. While stakeholders have observed a decline in such cases following the regime change in Syria, reports indicate that individuals held in removal centres continue to face pressure to sign voluntary return forms, with prolonged detention being used as a means of coercion. Stakeholders explain this trend by suggesting that, following the regime change in Syria, the attitude of Turkish authorities may have shifted in anticipation of high numbers of returnees. This argument is supported by the observation that once the pace of returns slowed, it became more common for individuals involved in criminal proceedings, even as complainants rather than defendants, to find themselves placed in removal centres and pressured to sign voluntary repatriation forms before being returned.[1149]

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.[1150] In the Abdulkerim Hammud decision (Application No. 2019/24388, Decision Date May 2, 2023)[1151], 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 (Application No. 1577/2019, Decision Date June 21, 2022[1152]). The Court also ruled 50,000 TL in non-

1145 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.
1146 Mülteci-Der, *Joint Assessment: Proposed Amendments in the Law on Foreigners and International Protection of Türkiye,* 4 December 2019, available here.
1147 Evrensel, 'Statü hakkı tanınmayan mülteciler yeni yaptırımlarla karşı karşıya', 25 December 2019, available in Turkish here.
1148 PMM, *Basın Açıklaması*, 27 June 2026, available here.
1149 Information provided by multiple stakeholders, February and March 2026.
1150 HUDOC, No. 1557/19, *Akkad v. Türkiye*, 21 June 2022, available in Turkish here.
1151 Resmi Gazete, *Abdulkerim Hammud decision* (Application No. 2019/24388, Decision Date May 2, 2023), available here.
1152 HUDOC, No. 1557/19, *Akkad v. Türkiye*, 21 June 2022, available in Turkish here.

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 days[1153].

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 2025, 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.[1154] 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.[1155] 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. In April 2022, the PMM 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.[1156] The number of temporary protection holders whose address verification took place was 986,852 in 2023 and 2,015,955 in 2022,[1157] and 1,877,269 in 2024. PMM's 2025 activity report does not include a breakdown of these figures.

1153 Refugee Rights Turkey, RRT, Sığınma hukuk bülteni.
1154 Article 2 TPR.
1155 PMM, 'Türkiye'de Geçici Koruma Kapsamında Bulunan Yabancıların Kişisel Verilerinin Doğrulanması', 22 March 2018, available in Turkish here.
1156 Hayata Destek Online, 'Adres Kayıt ve Güncelleme İşlemleri Nasıl Yapılır?', 12 April 2022, available here.
1157 PMM, *Faaliyet Raporu 2023*, available here.

The PMM 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 permit[1158]. It was stated that those who are found to be in Istanbul "without legal right to stay here" will be taken to Temporary Accommodation Centres[1159]. 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.[1160] Stakeholders reported that in early 2026, Syrians who had relocated to Istanbul from earthquake-affected areas and had previously been unable to register despite the restrictive approach of the authorities were finally granted registration, particularly those with school-age children.[1161]

The practices surrounding address verification, ID deactivation and their implications for official return statistics are documented in previous versions of this report.

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.[1162] 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.[1163] This number was previously announced as 120,133 on 19 August 2022.[1164] As of August 2024, 238,768 Syrian nationals under temporary protection have exceptionally acquired Turkish citizenship,[1165] 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.[1166] According to publicly available information, no updated statistics on the number of Syrians who have acquired Turkish citizenship were released in 2025. Interior Minister Mustafa Çiftçi has publicly noted that citizenship granted through lawful procedures cannot be arbitrarily revoked following a

1158 T.C. Istanbul Valiliği, İstanbul İlinde İkamet Eden Geçici Koruma Kapsamındaki Suriye Uyruklu Yabancıların Kayıtlı Oldukları İllere Dönmeleri Hakkında Duyuru, 28 July 2023.
1159 PMM, *İstanbul'da Bulunan Geçici Koruma Kapsamındaki Suriye Uyruklu Yabancıların Kayıtlı Oldukları İllere Dönmeleri Hakkında Duyuru*, 21 September 2023.
1160 BBC Turkiye, *Düzensiz göçmenlere yönelik kontroller arttı: 'Aylardır evden dışarı çıkmıyoruz'*, 19 December 2023, available here & Information provided by stakeholders, March-April 2024.
1161 Information provided by a stakeholder, June 2026.
1162 Information provided by various stakeholders, May and June 2023.
1163 Multeciler, *Turkiyedeki Suriyel Sayisi*, 20 June 2023, available here.
1164 Obianet, 'News List', 2023, available here.
1165 T.C. İletişim Başkanlığı, Türkiye'de bulunan yabancıların sayısı ve vatandaşlık durumları ile ilgili iddialara dair açıklama, 21 August 2024, available here.
1166 Anka, *Nüfus ve Vatandaşlık İşleri Genel Müdürlüğü: Türk vatandaşlığı kazanan Suriye uyruklu kişi sayısı 238 bin 768*, 21 August 2024, available here.

change of administration, without however disclosing updated figures on the total number of naturalisations.[1167]

The legal status of children born in Türkiye has been extensively debated. 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.[1168]

Despite the difficulties, more new-born Syrians become Turkish citizens every year. As of December 2023, 100,633 children had been granted Turkish citizenship.[1169] As of June 2026, no recent statistics were shared by the officials.

F. 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.[1170] No data was made available for 2023, 2024 and 2025.

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.[1171] IOM supports more than 20 countries including USA, Canada and EU countries in these

1167 Haberler, Bakan Çiftçi: '7 Basamaklı Okul Güvenliği Kalkanı' anlayışını hayata geçiriyoruz, 30 May 2026, available here.
1168 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.
1169 DW, İçişleri Bakanı: 238 bin 55 Suriyeli Türk vatandaşı oldu, 17 December 2023.
1170 Information provided by Turk Kizilay, June 2023.
1171 UNHCR, 'Üçüncü Ülkeye Yerleştirme', last accessed 13 July 2022, available here.

efforts.[1172] 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 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.

G. 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.[1173] 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".[1174]

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. According to stakeholders, there have been ongoing indications that inter-provincial travel restrictions for Syrians would be eased, however no such facilitation had been observed in practice as of the time of reporting. Cases were encountered in 2025 where individuals were denied travel permission even for the purpose of collecting the body of a deceased parent. Where individuals travelled without obtaining prior permission, enforcement was reported to be severe, with those apprehended being taken directly to removal centres.[1175]

1172 IOM, 'Yeniden yerleştirme', 2023, available here.
1173 Article 10(1)(ç) TPR.
1174 Article 15(1) TPR.
1175 Information provided by a stakeholder, June 2026.

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. In 2025 the number is 22,515.[1176] Stakeholders explain this decline by pointing to a shift in attitudes towards Syrian individuals throughout 2025. Following the regime change in Syria in December 2024, forced returns were largely replaced by counselling and encouragement under voluntary return campaigns.[1177]

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 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.[1178] 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.[1179]In 2025, no public data was shared on this.

In early 2022, it was formalised 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 2024[1180], 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 and 2025 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.[1181]

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

1176 PMM, *Irregular migration statistics*, available here.
1177 Information provided by a stakeholder, April 2026.
1178 Hayata Destek Online, 'Adres Kayıt ve Güncelleme İşlemleri Nasıl Yapılır?', 12 April 2022, available here.
1179 T.C. İçişleri Bakanlığı, Göç İdaresi Başkanlığı, İçişleri Bakanı Ali Yerlikaya, Adres Tahkikatlarından Sonra Suriyelilerin Sayısının 2 Milyon 935 Bin 742'ye Düştüğünü Açıkladı, 20 November 2024, available here.
1180 PMM, "İstanbul'da 39 İlçenin Yabancıların İkamet İzinlerine Kapatıldığı" İddialarına İlişkin Basın Açıklaması, 16 July 2023, available here; BBC Türkçe, Kayıtlı olduğu adreste bulunamayan 729 bin Suriyeli, kaydını güncellemezse ne olacak?, 09 August 2024, available here.
1181 Mülteciler Derneği, 'Türkiye'deki Suriyeli Sayısı Haziran 2023', 2023, avaible here.

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.[1182]

In 2022, Ministry of Interior Affairs issued a circular to PDMMs 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.[1183] In 2025, like in 2024 and 2023, no information regarding the implementation of this rule was available.

As of 1 July 2025, new arrangements have entered into force governing crossings at the Syrian land border gates. Syrians who have subsequently acquired Turkish citizenship (dual nationals) may now enter and exit through land border gates using their passports; among these, persons employed in Syrian public institutions who reside in border provinces and cross on a daily basis may also cross using their identity cards, provided their passports are presented. Applications under this category require the submission of an identity card, passport, and family registry record (*aile nüfus kayıt örneği*); applications are made directly at the land border gate, and following document and system checks, transactions are finalised on the basis of the passport. As of the same date, Syrians who are officially married to Turkish citizens but have not yet acquired Turkish citizenship may likewise enter and exit through land border gates using their identity cards, provided they document their marriage; in such cases, the Turkish citizen spouse crosses with a passport, while the spouse who has not yet acquired citizenship may cross with an identity card. Where children travel together with the Syrian spouse, the consent of the Turkish citizen spouse is required. These applications likewise require the submission of an identity card, passport, and family registry record, and are made directly at the land border gate. In addition, persons crossing with a passport through land border gates other than those located on the Şanlıurfa provincial border may also cross with their vehicles, provided the vehicles meet the applicable conditions and customs procedures are completed.[1184]

3. Resettlement and family reunification departures

3.1 The general procedure

According to PMM statistics, a total of 73,272 Syrians had been transferred to third countries between 2016 and May 2025, mainly to Canada, the US, Germany, France and Netherlands.[1185]

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.[1186]

1182 Information provided by a stakeholder, May 2023.
1183 AA, 'İçişleri Bakanı Soylu: Taksicilere yabancı yolcuların il dışı seyahat izin belgelerini kontrol yükümlülüğü getiriyoruz', 2022, available in Turkish here.
1184 PMM, Suriye Kara Hudut Kapılarından Geçişler, 30 June 2025, available here
1185 PMM, *Temporary protection*, available here.
1186 IOM, 'Yeniden yerleştirme', 2023, available here.

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.[1187] 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.[1188] Building on this foundation, a new Roadmap covering the period 2025–2028 was adopted in June 2025, continuing the same overarching objective of aligning Türkiye's asylum and reception systems with CEAS standards. With respect to resettlement specifically, the EUAA established a Resettlement Support Facility in Istanbul in 2019 to streamline EU resettlement processes; following a pilot phase supporting eight countries, this facility has operated on a more structured basis since mid-2021, providing logistical support, including medical checks, transportation, and interpretation, to EU Member States and associated countries. Under the 2025–2028 Roadmap, cooperation on resettlement is set to continue, with dedicated activities aimed at enhancing the PMM's resettlement expertise and improving the efficiency of resettlement processing from Türkiye.[1189]

Departure of temporary protection beneficiaries to third countries for the purpose of resettlement is subject to the permission of PMM.[1190] 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 collaborative[1191].

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.

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.[1192] Since 2021, the European Union Agency for Asylum (EUAA) has collaborated with PMM to facilitate resettlement in EU 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.[1193]

As of February 2025, more than 43,815 Syrian refugees had been resettled from Türkiye to the EU under the 1:1 scheme with Türkiye accepting only 2 140 migrants from the Greek islands in return – and none since March 2020.[1194] A country-by-country breakdown for the period after March 2024 is not publicly available. For more details, see Content of International Protection: Resettlement.

1187 Information provided by a stakeholder, June 2023.
1188 EUAA, *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*, 2022, available here.
1189 EUAA, *Roadmap for Cooperation between the EUAA and Türkiye (2025-2028)*, 09 July 2025, available here.
1190 Article 44 TPR.
1191 Information provided stakeholders, March & May 2024.
1192 Council of the European Union, *EU-Türkiye statement*, 18 March 2016, para 2.
1193 Information provided by a stakeholder, June 2023.
1194 European Parliament, *Parliamentary question - P-003799/2025*, 01 October 2025, available here.

H. 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.[1195] These camps are officially referred to as Temporary Accommodation Centres.[1196] A further amendment to the LFIP in 2018 sets out provisions on the financing of camps set up by PMM.[1197]

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.[1198] 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 2025, the decongestion and closure process significantly reduced both the number of operational TACs and the population residing in them. Of the 11 TACs previously operational in south-eastern Türkiye, six were closed or in the process of closure during 2025. By the end of September 2025, the TACs in Malatya Beydağı, Osmaniye Cevdetiye, Hatay Apaydın, Yayladağı, and Boynuyoğun had been fully evacuated, with Kahramanmaraş TAC following in November 2025.[1199] The remaining operational facilities are the Sarıçam TAC in Adana, the Nizip and Islahiye-2 TACs in Gaziantep, the Elbeyli TAC in Kilis, and the Harran TAC in Şanlıurfa, with congestion at Sarıçam also significantly reduced. According to stakeholders, more than 7,000 households, approximately 35,000 individuals, were residing in TACs as of September 2025.[1200] In parallel, of 19 container sites in the south-east, 15 were planned for closure, of which 10 had already been closed by the time of reporting. Camp-specific population figures were not publicly disclosed by PMM for 2025.

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,

1195 Article 37(3) TPR, as amended by Regulation 2018/11208.
1196 Article 3 TPR.
1197 Article 121A LFIP, inserted by Article 71(e) Decree 703 of 9 July 2018.
1198 Article 24 as amended by Regulation 2019/30989.
1199 PMM, *Faaliyet Raporu 2025*, available here.
1200 Information provided by multiple stakeholders, April and May 2026.

- 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.[1201]

In 2024 and 2025 PMM stated the intent to change the function of TACs: designated centres are to accommodate persons with specific needs only, while remaining TACs are to be used for Syrians who are unregistered or who fail to fulfil their obligations under the temporary protection regime. [1202] In practice, stakeholders noted that certain TACs, most notably Nizip, have also been used in connection with international protection procedures (See: Asylum Procedures). .

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 2025, the total population of temporary protection beneficiaries registered with Turkish authorities was listed as 2,347,756. As of 04.07.2026, the number had decreased to 2,225,031[1203]

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, Adana and Mersin). While İstanbul hosts the largest number of registered temporary protection beneficiaries with 397,555, this only corresponds to 2.46% of its population. Conversely, temporary protection beneficiaries correspond to 12.5% of the population in Gaziantep, 7.78% in Şanlıurfa, 7 % in Adana and in 6.77% in Mersin. In Kilis, 1 out of every 5 people is Syrian.[1204]

Syrian nationals are barred from owning property in Türkiye since 1930 because of a reciprocal ban that Syria implemented after the issue of the Hatay province in 1939.[1205] 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 sentiment.[1206] To navigate these challenges, Syrians often rely on

1201 UNHCR, 'Registration with the Turkish authorities', last accessed 13 July 2023, available here.
1202 PMM, *Faaliyet Raporu 2025*, available here; PMM, Stratejik Plan 2024-2028.
1203 PMM, 'GEÇİCİ KORUMA', 14 June 2024, available in Turkish at: https://bit.ly/3NSpvkG.
1204 PMM, 'GEÇİCİ KORUMA', available in Turkish at: https://bit.ly/3NSpvkG.
1205 Hürriyet, 'Meclis Göç ve Uyum Komisyonu Başkanı: Suriyeli Türkiye'den mülk alamıyor', 7 October 2023, available here.
1206 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.

local community members, Syrian mediators, and Syrian-only segregated settlements.[1207] After 2021, the rising cost of living in urban areas has had a devastating impact on refugees and deteriorated their living conditions.[1208] 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 Istanbul at 713%,[1209] amid inflation-driven rent increases disproportionately affecting the most vulnerable groups, including refugees. In 2024 and 2025, rental prices remained a significant issue.[1210] Although there were two opposing views[1211] on how returns might affect housing costs, by June 2026,given that 700,120 Syrians had returned,no noticeable impact on rental prices 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 increase[1212]. 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.[1213]

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.[1214] 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 conditions[1215]. 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.[1216] In 2025 like 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 cards[1217]. 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.[1218] (See: Exclusion and cancellation of temporary protection).

In 2025 and 2026, stakeholders began observing a practical obstacle in the address registration process affecting Syrians relocating to a new residence. When a Syrian national moves to a new address and presents a notarised rental agreement, the registration of the new occupant cannot be completed unless the previous occupant's address record is first transferred out. Civil registration directorates require the

1207 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.
1208 Information provided by a stakeholder, May 2023.
1209 BBC Türkçe, Konut krizi: 'Kiralar 4 yılda en az 6 kat arttı, yatırımcı uzaklaştı, bankalar kredi vermeye gönülsüz', 5 June 2023, available here.
1210 Evrensel, Konut stoku arttı, kiracı sayısı 24 milyonu aştı, 19 May 2025, available here; Milliyet, *Kirada 2026 öncesi dengeler değişti! İşte fiyatı en çok ve en az artan iller*, 18 December 2025, available here.
1211 Sputnik Türkiye, *Suriyelilerin gidişi ardından etkilenecek ilçeleri tek tek açıkladı: '20 bin TL'lik kiralar 13 bin TL'ye düşecek'*, 12 December 2024, available here; T24, *Gayrimenkul uzmanları: Suriyelilerin dönmesi konut piyasasını etkilemez*, 11 December 2024, available here.
1212 Information provided by stakeholders, March - April 2024.
1213 Information provided by a stakeholder, May 2023.
1214 Information provided by stakeholders, March - April 2024.
1215 Heinrich Böll Stiftung, *Göçmen Mahallelerinde Yaşam: Türkiye'de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı*, November 2023, available here.
1216 Information provided by stakeholders, March - April 2024.
1217 Information provided by multiple stakeholders, March 2025.
1218 Information provided by a stakeholder, June 2025.

departing individual to formally transfer their own registration before the incoming resident can register at that address. In cases where the previous occupant fails to do so, the landlord's declaration that the person no longer resides at the property does not trigger an automatic deregistration. As a result, Syrians holding valid notarised tenancy agreements are unable to complete their address registration, as the civil registration system does not remove the prior record automatically and registration directorates do not act on landlord statements alone.

Urban transformation (kentsel dönüşüm) intensified significantly in 2025, particularly concentrated in Istanbul, driven by various government incentives. According to the stakeholders many of those affected reside in older housing stock located in neighbourhoods identified as seismically high-risk. Urban transformation in practice means eviction of the existing tenant, who must then enter a new rental contract elsewhere at a significantly higher rent. This dynamic, displacement through urban renewal followed by unaffordable rental costs, has by itself been cited by a considerable number of individuals as a reason for stating an intention to return to Syria.[1219]

Earthquakes-affected region

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.[1220] 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.[1221] 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.

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.

1219 Information provided by a stakeholder, June 2026.
1220 Information provided by stakeholders, March - April 2024 and information provided by refugees in focus group discussions, April 2024.
1221 Information shared by stakeholders, April 2024.

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.[1222] 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.[1223]

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.[1224]

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.[1225] 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.

I. 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?	☒ Yes ☐ No
❖ If yes, when do beneficiaries have access the labour market?	6 months
2. Does the law allow access to employment only following a labour market test?	☒ Yes ☐ No
3. Does the law only allow asylum seekers to work in specific sectors?	☒ Yes ☐ No
❖ If yes, specify which sectors:	
4. Does the law limit beneficiaries' employment to a maximum working time?	☐ Yes ☒ No
❖ If yes, specify the number of days per year	
5. Are there restrictions to accessing employment in practice?	☒ Yes ☐ No

1222 Türk Tabipleri Birliği & Sağlik ve Sosyal Hizmet Emekçileri Sendikasi Şubat 2023 Depremleri 1. Yil Raporu, 2024, available here.
1223 *Gender Analysis in Earthquake Areas: Women's Access to Justice and Legal Aid*, Prof. Dr. Gülriz Uygur, available here.
1224 Ibid.
1225 Kirkayak Kültür, "We started from zero, we returned to zero again…", February 2024, available here.

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.[1226] 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.[1227] An application for a work permit may be lodged following 6 months from the granting of temporary protection status,[1228] by the employer through an online system (*E-Devlet Kapısı*) or by the beneficiary him or herself in the case of self-employment.[1229]

The Regulation foresees an exemption from the obligation to obtain a work permit for seasonal agriculture of livestock works.[1230] In that case, however, beneficiaries must apply to the relevant provincial governorate to obtain a work permit exemption.[1231] 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.[1232] 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.[1233]

In October 2024, an exemption from the obligation to obtain a work permit was granted to holders of temporary protection and humanitarian residence permits. Under the measure, those notified by the Ministry of Interior through the system are exempt from the work permit requirement within the scope and for the duration specified in the notification.[1234] However, according to stakeholders, the vague wording of the measure and the absence of implementing guidance caused considerable confusion among beneficiaries. It was unclear what exactly fell within the scope of the exemption and what steps were required in practice. The need to obtain an exemption certificate in particular deterred many, despite the fact that the process involves generating the relevant document through the e-government portal. Under this scheme, employers are able to register the individual directly with the Social Security Institution (SGK) and pay social insurance premiums without the need for a separate work permit.[1235]

Due to widespread confusion between the exemption mechanism and the standard work permit procedure, awareness of the measure remained extremely limited and it was not until mid-2025 that it began to gain broader recognition among the affected population. The extent to which the measure had gone unnoticed was illustrated in June 2026, when Minister of Interior Mustafa Çiftçi publicly announced[1236] that a work permit exemption had been introduced for foreigners under temporary protection in order to support registered employment — a statement that was widely received and reported as though it announced an entirely new development, despite the measure having been in force since October 2024.

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.[1237] However, it may cease to issue work permits in respect of provinces which have been determined by the Ministry of Interior to pose

1226 Article 29 TPR.
1227 Article 4(1) Regulation on Work Permit for Foreigners under Temporary Protection.
1228 Article 5(1) Regulation on Work Permit for Foreigners under Temporary Protection.
1229 Article 5(2)-(3) Regulation on Work Permit for Foreigners under Temporary Protection.
1230 Article 5(4) Regulation on Work Permit for Foreigners under Temporary Protection.
1231 *Ibid*.
1232 Article 5(5) Regulation on Work Permit for Foreigners under Temporary Protection.
1233 Article 6(2) Regulation on Work Permit for Foreigners under Temporary Protection.
1234 Article 48(1)/ş Regulation on the Implementation of the International Labour Force Law
1235 Information provided by a stakeholder, June 2026
1236 PMM, *İçişleri Bakanı Mustafa Çiftçi Sivil Toplum Kuruluşları ile İstişare ve Değerlendirme Toplantısı'nda Bir Araya Geldi*, 26 June 2026, available here.
1237 Article 7(1) Regulation on Work Permit for Foreigners under Temporary Protection.

risks in terms of public order, public security or public health.[1238] The Ministry may also set a quota on temporary protection beneficiaries based on the needs of the sectors and provinces.[1239] 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.

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.[1240] Under the Regulation, temporary beneficiaries may not be paid less than the minimum wage.[1241] 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.[1242] Approximately more than 1 million Syrians are estimated to be working informally without legal protections and rights.[1243] 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 care[1244]. In Türkiye, Syrian women under Temporary Protection are primarily employed in the food and agriculture sectors. There is no public data for 2025.

83,215 refugees were registered with İŞKUR with EU support by June 2025, an 11 percent increase from 74,975 the year before, with men accounting for 80 percent of registrations; disaggregated data specific to Syrians under temporary protection is not reported separately. Most refugees participated in active labour market programmes (ALMPs), where the completion rate was 65 percent, indicating that more than one-third of participants left the programme before reaching the employment-offer stage, primarily due to low wages, long commuting distances, and household or childcare responsibilities. Stakeholders further observed that İŞKUR mainly channels refugees into generic vacancies with little tailoring to their skills, and that short, theory-heavy trainings need to be complemented by longer practical modules, on-the-job experience, and stronger post-placement support [1245].

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 field[1246]. Information is provided in Turkish, English and Arabic.

1238 Article 7(2) Regulation on Work Permit for Foreigners under Temporary Protection.
1239 Article 8 Regulation on Work Permit for Foreigners under Temporary Protection.
1240 Ministry of Labour and Social Security, *Payment of Official Charges and Stamp Paper Fees*, last accessed 10 June 2025, available in Turkish here.
1241 Article 10 Regulation on Work Permit for Foreigners under Temporary Protection.
1242 UNHCR, Facts about refugees and stateless people in Türkiye, available here.
1243 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.
1244 ILO, *Türkiye'deki Depremlerin Ardından Yerel İşgücü Piyasası Dinamiklerinin ve Beceri İhtiyaçlarının Değerlendirilmesi*, 28 August 2023, available here.
1245 EU Facility for Refugees in Türkiye, *The Facility Results Framework Monitoring Report No. 14*, December 2025, available here.
1246 Available here.

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.

Syrians are impacted by the widespread practice of undeclared employment under substandard working conditions and low wages.[1247] 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.[1248] Another study emphasises other barriers such as anti-refugee sentiments, geographical restrictions and economic crises.[1249] 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.[1250] 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.[1251]

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.[1252] Professions such as doctors, lawyers, teachers, and pharmacists require very long procedures for recognition of qualifications to work in their fields, however, those specialised in areas such as services, trade, and information technology, which do not require recognition of qualification, can find jobs easier in the private sector.[1253]

Poor health and safety conditions at work are also a matter of concern, it was reported that 91 migrants lost their lives in work-related accidents in 2025. 36% of the victims were Syrians.[1254]

Women, in particular, face significant challenges in obtaining effective access to the labour market. This is due, on the one hand, legal restricitons such as obstacles to access childcare, lack of information and training opportunities.[1255] 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

1247 Evrensel, 'Kayıt dışı, güvencesiz çalışma ve sömürü kıskacında mülteci işçiler', 2022, available in Turkish at: https://bit.ly/43oe9ee.

1248 Badalič, V. (2023). Trapped in the underground economy: Syrian refugees in the informal labour market in Turkey. Third World Quarterly, 44(5), 967–984, available here.

1249 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/IJMHSC-08-2023-0077

1250 Mülteci tarım işçisi kadınların çadır ve tarla arasındaki yaşamı, available here

1251 Information provided by a stakeholder, March 2024.

1252 Relief Web, 'Türkiye 3RP Country Chapter 2023-2025', 16 March 2023, available here

1253 Heinrich Böll Stiftung, *Göçmen Mahallelerinde Yaşam: Türkiye'de 2010 Sonrası Göçler ve Göçmenlerin Toplumsal Katılımı*, November 2023, available here.

1254 Isig Meclisi, *İş Cinayetlerine ve Çocuk İşçiliğine Karşı Mücadeleye… 2025 yılında en az 2105 işçi iş cinayetlerinde hayatını kaybetti*, 09 January 2026, available here.

1255 Alternatif Politika, 'Gender Negotiation In Syrian Women's Paid Workforce Participation In The Context Of Forced Migration', 2022, available here.

workplaces.[1256] Syrian women often try to find a solution by doing piecework at home in order to ensure their economic freedom[1257].

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.[1258] Ministry of Labour and Social Security announced a six-year National Action Plan to Fight Against Child Labour in 2017. As of 2025, there is no another national action plan. Research showed that at least 4.4% of the child population was working, with the main causes of child labor in Turkiye being child poverty, deficiencies in social protection, and the informal economy.[1259] 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.[1260] According to stakeholders, this trend continued into 2025 and 2026 as economic conditions in Türkiye deteriorated further.[1261] 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.[1262]

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 15.3% in 2025.

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. Stakeholders noted that this pattern was disrupted in 2025, following the change of regime in Syria, when family reunification procedures in Europe were suspended and individuals who had irregularly crossed were rapidly returned. According to stakeholders, this practice is no longer as prevalent. Where children continue to work instead of attending school, this is now attributed by stakeholders entirely to high rental costs rather than to family separation dynamics.[1263]

Refugees and host community members received a variety of employability capacity development and support services in 2025. During the first half of 2025, 129,301 individuals had been registered in vocational skills development programmes, with 46,121 new registrations recorded during the reporting year alone, and a cumulative total of 108,758 individuals completing vocational training, including 32,671 during the reporting period. Employment counselling services expanded significantly, reaching 183,796 individuals, representing a 23 percent year-on-year increase.[1264] Between 2014 and 2024, a total of 4,110,426 foreign trainees participated in courses organised in public education centres, with 3,101,830 of them being Syrian trainees.[1265]

1256 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.

1257 Hayata Destek, *Sanki yeniden doğmuş gibi*, November 2023, available here.

1258 Irina Fehr & Conny Rijken, ‘Child Labor Among Syrian Refugees in Turkey’, *Frontiers,* 2022, available here.

1259 UNICEF, Çocuk işçiliği, available here.

1260 UNICEF, *Report on Analysis for Out-of-school Syrian Children Türkiye Country Report*, July 2024, available here.

1261 Information provided by a stakeholder, June 2026.

1262 Sol Haber, *Çalışırken ölüyorlar: 15-17 yaş arası her dört çocuktan biri işçi*, 19 April 2025, available here.

1263 Information provided by a stakeholder, June 2026.

1264 European Commission, *14th Facility Results Framework Monitoring Report (as of 30 June 2025) and Annex*, 22 January 2026, available here.

1265 Hayat Boyu Öğrenme Genel Müdürlüğü 2025 İzleme Değerlendirme Raporu, available here.

There are projects aiming to address some of the abovementioned challenges. "Promoting Sustainable and Socially Inclusive Labour Market Integration Project" has been carried out by the Department of Migration and Education in Emergencies, with a budget of €1,600,000 funded by the EU. Running from 2024 to 2028, the project aims to strengthen social inclusion and integration in Türkiye by increasing the formal employment of host community members, Syrians under temporary protection, and persons holding international protection status. The project targets foreign nationals and Turkish adults who will benefit from 1,000 vocational skills courses across 20 provinces. "Early Childhood Education Project for Syrian and Vulnerable Turkish Children in Türkiye" has been carried out by the Department of Migration and Education in Emergencies, with a budget of €7,800,000 funded by the German Corporation for International Cooperation (GIZ). Running from 31 January 2020 to 28 February 2026, the project aims to establish the principles and working procedures for cooperation on early childhood education for Syrian and vulnerable Turkish children in Türkiye. The project targets Turkish and foreign national children. "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 Programme. Phase 1 ran from 31 December 2019 to 30 April 2025, and Phase 2 runs from 1 July 2025 to 31 December 2026. 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 Kilis. The project ended on 27 February 2025.[1266]

The "Supporting Transition to the Labor Market Project,"[1267] (ISDEP II) 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, 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. The project ended in November 2025.[1268]

Entrepreunership

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.[1269]

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 2025, a

1266 Hayat Boyu Öğrenme Genel Müdürlüğü, İzleme ve Değerlendirme Raporu 2025, available here.
1267 Resmi Gazete, İşgücü Piyasasina Geçişin Desteklenmesi Projesi (P171471), available here.
1268 İŞKUR, Devam Eden Projeler, available here.
1269 Alkhazam, and Ugurlu, 2023. International Journal of Economics and Management Engineering, 17 (7).

total of 18,845 refugee and host community-owned enterprises had received advisory services, 93% host-owned and 6.8% Syrian-owned, with women making up 21% of owners. Separately, 7,057 enterprises received financial and/or material assistance (86% host-owned, 13% Syrian-owned), 39% women-owned, mostly existing small and micro-sized businesses.[1270]

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.[1271]

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 ended in December 2025.[1272] Following its conclusion, a successor programme, ENHANCER PRO, was announced. Under this new phase, supported projects run for a minimum of 9 and a maximum of 12 months, during which a new business is expected to be established and to operate sustainably. The programme aims not only to support entrepreneurs in starting businesses, but also to help them become lasting, value-generating actors within the economic system. The call for the Entrepreneurship Grant Programme was announced on 9 April 2026, with applications remaining open until 19 June 2026.[1273]

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

1270 European Commission, *14th Facility Results Framework Monitoring Report (as of 30 June 2025) and Annex*, 22 January 2026, available here.
1271 Information provided by a stakeholder, March 2024.
1272 ICMPD & Ministry of Industry and Technology, ‘Enhancer Project’, last accessed 13 July 2023, available here.
1273 ICMPD, ENHANCER PRO Girişimcilik (Start-up) Hibe Programı, available here.

protection registration and are officially admitted by the school.[1274] However, there is a tendency not to enrol children in school as they think it will encourage parent not to register with authorities.[1275]

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.[1276] As of January 2022, the EU facility for refugees in Türkiye factsheet reported 89 new schools built.[1277] 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.[1278]

The education response in Türkiye is led and coordinated by the Ministry of National Education (MoNE). By 2 July 2026, 778,897 Syrian children were of school age.[1279] In ,2025-2026 school year, 675,521 (%77,64) Syrian are enrolled in education 25,759 in kindergarten, 325,511 in primary, 225,237 in secondary, 99,014 in high school.[1280]

Stakeholder input regarding enrolment motivation, following the change of regime in Syria in December 2024, indicated an initial wave of excitement, with many families deciding not to enrol their children for the school year on the assumption that they would soon return to Syria. According to the same source, the regime change alone proved insufficient to sustain this expectation: those who did return found that infrastructure, services, and access remained lacking, leading to widespread regret. As a result, many of these families reconsidered and sought to re-enrol their children, who had in the meantime been left without access to education.[1281]

Among children who remained in Türkiye and continued their education, peer bullying reportedly did not decrease. The stakeholder noted that children wishing to file complaints about bullying were sometimes discouraged from doing so, including through threats that a complaint to the police could result in deportation. Additionally, following December 2024, children reportedly faced frequent remarks from teachers and peers — made in a half-serious, half-joking manner — suggesting that "your country has been fixed now, so you're going back," which reportedly caused significant distress among the children targeted.[1282]

Vocational Training Centres (MESEM) are a form of formal, compulsory secondary education established in Turkey since 2016, designed to address the country's need for a skilled workforce by combining classroom instruction with on-the-job training under a master-apprentice model. Students enrolled in MESEM attend theoretical education one day per week and receive practical training at workplaces for the

1274 Information provided by a stakeholder, May 2023.
1275 Information provided by stakeholders, March-April 2024.
1276 Delegation of the European Union to Türkiye, 'Education for all in times of crisis II', available here.
1277 European Commission website, 'EU Facility for Refugees in Türkiye', January 2022, available here.
1278 EU Facility for Refugees in Türkiye, *The Facility Results Framework Monitoring Report No. 13 December 2024*, available here.
1279 PMM, *Statistics*, available here.
1280 Hayat Boyu Öğrenme Genel Müdürlüğü, İzleme ve Değerlendirme Raporu 2025, available here
1281 Information provided by a stakeholder, June 2026.
1282 Information provided by multiple stakeholders, January and February 2026, ERG, *Eğitim İzleme Raporu 2025*, 24 November 2025, available here.

remaining four days.[1283] Stakeholders have criticized this model for undermining children's school attendance and contributing to child labour, a concern that extends to refugee children, particularly Syrians.[1284] The Istanbul Bar Association's Children's Rights Centre has noted in a report that hundreds of thousands of children working under the guise of education in MESEMs are not included in child labour statistics, since they are officially classified as students, despite the fact that these children receive only one day of education per week while being made to work on the remaining five. Similarly, children working in unpaid family labour, those working informally, and refugee children are also excluded from TÜİK figures.[1285]

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.[1286] According to Türk Kızılay, in cases were 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.[1287] As of mid-2025, a total of 360,293 students benefitted from CCTE.[1288] CCTE has mainly focused on primary school children. Families are compensated 90 TL (1.69 EUR) for boys and 100 TL (1.88 EUR) for girls attending kindergarten and primary school per month and 130 TL (2.45 EUR) for boys and 150 TL (2.83 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 fourth phase in February 2025, will continue until July 2026.[1289]

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).[1290] 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

1283 T.C. MEB, Mesem Hakkında Her Şey, 11 May 2025, available here.
1284 ERG, *MESEM: Eğitimin Kıyısında İş Hayatının Ortasında*, 15 May 2026, available here.
1285 İstanbul Barosu, *Istanbul barosu çocuk haklari merkezi 23 nisan özel yayini*, 21 April 2026, available here.
1286 Ministry of Family and Social Services, 'Şartlı Eğitim (ŞEY) ve Şartlı Sağlık (ŞSY) Yardımı', available in Turkish here.
1287 Toplum Merkesi, 'Toplum Merkezine Hoşgeldiniz', last accessed 13 July 2023, available in Turkish here
1288 European Commission, *14th Facility Results Framework Monitoring Report (as of 30 June 2025) and Annex*, 22 January 2026, available here.
1289 Hayat Boyu Öğrenme Genel Müdürlüğü, İzleme ve Değerlendirme Raporu 2025, available here
1290 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 program is expected to run until 30 September 2027.

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.[1291] 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.[1292] 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. There is no publicly available data for 2025. 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.[1293] However, some universities[1294] 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 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. [1295] 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

1291 UNHCR, *Education*, available here.
1292 Turkish government, official higher education statistics, available here.
1293 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.
1294 For example, Anadolu University, available here.
1295 UNHCR, *Education*, available here.

inclusion, and partnerships between universities, municipalities, government institutions, and international organizations. The programme ended in January 2026.[1296]

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.

J. 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.[1297] 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.[1298]

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 individuals with a disability level of 40% or more (disability status must be documented with a disability report to be obtained from the authorised 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

1296 ICMPD, 'BEUrs:', last accessed 13 July 2023, available here.
1297 European Commission, 'European Civil Protection and Humanitarian Aid Operations', last updated in 2023, available here.
1298 ibid.

healthy adult (18-59 years old) in the family)[1299]. As of May 2026, a monthly allowance is 750 TL (14.5 €) per family member through the *Kızılaykart*.[1300]

Stakeholders noted that these criteria do not take into account the premature aging and physical/psychological deterioration observed among Syrian nationals, a consequence of the traumatic experiences they have undergone, which in practice results in their exclusion from the labour market beyond the age of 50.[1301]

The ESSN scheme is the single largest humanitarian project in the history of the EU. As of May 2026, 39 billion EUR were distributed, 672,337 people and 140,663 householders were being reached.[1302] Among the beneficiaries of this programme majority (633,227) 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.[1303]

Considering that in 2025 the net minimum wage is 22,104.67 TL[1304] (around 442 EUR), the hunger threshold is 30,143.75 TL and the poverty threshold is 98,188.11 TL,[1305] 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 2026, 270,597people and 58,848 householders were receiving support, for an amount of 1050 TL (20 EUR) per month.[1306]

- **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 3 Temporary Accommodation Centres (Adana, Elazığ and İslahiye). People receiving assistance receive e-vouchers for the monthly per capita aid (1050 TL /20 EUR) that they can use for food and non-food shopping inside the camp via the Kizilay Card. As of May 2026, 3,884 people were benefiting from it.[1307] A significant decrease from 31,559 in 2025. Majority of beneficiaries are Syrians, other top 3 nationalities are Ukraine, Russia and Azerbaijan

- **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 288,985 beneficiaries and 155,117 householders as of May 2026. [1308] CCTE has mainly focused on primary school children.[1309] It is 270 TL (5 EUR) for boys and 300 TL (5.5 EUR)

1299 Multeci-der, SUY, available here.
1300 Ibid.
1301 Information provided by a stakeholder, June 2026
1302 Kızılaykart, 'Monthly ESSN Programme Infographics, 2026, available here.
1303 Information provided by a stakeholder, June 2023.
1304 T.C. Çalışma ve Sosyal Güvenlik Bakanlığı | Asgari Ücret, available here.
1305 Türk-İş, Aralık 2025 Açlık ve Yoksulluk Sınırı, availablehere.
1306 Kizilaykart, 'Monthly C-ESSN Programme Infographics, 2026, availablehere.
1307 Kızılaykart, *Monthly in Camp Programme Infographics*, May 2026 available here.
1308 Kızılaykart, *Monthly CCTE Project Infographics*, May 2026, available here.
1309 *Ibid*.

for girls attending kindergarten, primary and secondary scool per month and 390 TL (7.35 EUR) for boys and 450 TL (8.5 EUR) per girls attending high school per month.[1310]

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 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.[1311]

K. 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.[1312] 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.[1313] 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.[1314]

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.[1315]

On 27 November 2025, the Temporary Protection Regulation was amended by Presidential Decision No. 10658,[1316] entering into force on 1 January 2026. Under the amended Article 27, the contribution fee will be aligned with the rates set out in the Health Implementation Notice (SUT) applicable to general health insurance holders, rather than being determined by the Ministry of Interior, and health service providers are barred from charging above these standardised rates or applying a lesser discount than foreseen for GHI holders — pointing towards more uniform application than previously reported. Notably, the amendment

1310 *Ibid.*
1311 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, 66.
1312 Article 27 TPR.
1313 Article 27(1)b as amended by Regulation no.30989.
1314 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.
1315 isvesosyalguvenlik, 'Gelir Testinde G0 – G1 – G2 – G3 Ne Demek ?', 2018, available here.
1316 Official Gazette No. 33091, 28 November 2025.

also introduces, for the first time, a reimbursement mechanism: beneficiaries assessed by the Ministry of Family and Social Services, in coordination with the Presidency of Migration Management, as lacking the financial capacity to pay will be entitled to reimbursement of contribution fees already paid, upon request, through social solidarity foundations. The exemption criterion accordingly shifts from a categorical "vulnerable groups" test to an individualised assessment of payment capacity.[1317]

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.[1318] 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 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.[1319]

Among foreign women who had children in 2025, Syrian mothers were in the first place with 7,477 babies.[1320]

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 psycho-social services in some locations around Türkiye with limited capacity. For instance, Türk Kızılay runs

1317 BBC Türkçe, Suriyelilere ücretsiz sağlık hizmeti dönemi sona eriyor, 28 November 2025, available here.
1318 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.
1319 Information provided by a stakeholder, May 2023.
1320 TÜİK, Doğum İstatistikleri, 2025, available here.

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), (SIHHAT-2) and (SIHHAT-3) projects, 176 Migrant Health Centres (*Göçmen Sağlığı Merkezi*) were established for migrants, especially targeting Syrian beneficiaries of temporary protection in 32 provinces.[1321] 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.[1322] 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 workers[1323]. Since 2017, more than 59 million primary healthcare consultations have been provided to refugees through the SIHHAT project, 95% of which were delivered through E/MHCs. As of December 2025, 182 E/MHCs were operational, representing 96% of the target set for the current project phase. The total EU allocation for the health sector amounts to EUR 1.05 billion, of which EUR 951 million had been disbursed by the end of December 2025. [1324]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.[1325]

In addition, the EU-funded "Strengthening Health Care Infrastructure for All" (SHIFA) project, now valued at EUR 140 million and running until 2029, supports the construction and rehabilitation of health facilities, with continued focus on the earthquake-affected zone. By Q4 2025, the EU had supported the upgrading of 623 PHC and SHC facilities in total, representing 79% of the overall infrastructure target. Under SHIFA specifically, 45 hospitals across 24 provinces were equipped with 99 pieces of cardiology equipment, and 14 hospitals received 930 pieces of physiotherapy and rehabilitation (PTR) equipment. The project completed 20 of 22 planned rehabilitations of existing E/MHCs and all 110 planned PTR unit rehabilitations. Of 565 planned health centre buildings, which will co-locate E/MHCs, Family Health Centres and Healthy Life Centres, 45 were under construction and 11 contracted as of early 2026, with the aim of moving 56 E/MHCs out of rented premises into public buildings.[1326]

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. In 2024, a total of 10.73 billion Turkish Lira (TRY) was allocated to the Directorate for

1321 SIHHAT, *Türkiye'de Göçmen Sağlığı Hizmetlerinin Desteklenmesi Projesi (IPA-III/2023/433-160)*, 08 May 2025, available here.
1322 AA, 'Bakan Koca: Ayrım yapmaksızın göçmenlerin sağlık ihtiyacına ilişkin ortak bir yol izlemek hepimizin asli görevi', 17 March 2023, available in Turkish here.
1323 Sihhat Project, *Instagram*, available here.
1324 European Commission, *EU Support to Refugees in Türkiye*, Health, June 2026, available here
1325 EU Monitor, *Legal provisions of COM(2024)593 - Eighth Annual Report of the Facility for Refugees in Türkiye*, 19 December 2024, available here.
1326 European Commission, *EU Support to Refugees in Türkiye, Health*, June 2026, available here.

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.[1327] . There is no publicly available data for 2025.

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.[1328] 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.

The amended contribution fee regime under Article 27(6) of the Temporary Protection Regulation entered into force on 1 January 2026, and its effects were felt almost immediately. A February 2026 needs assessment by Doctors of the World (DDD), based on a household survey with Syrians in İzmir and Hatay, found that access to healthcare among Syrians under temporary protection had become the exception rather than the norm following the entry into force of the amended contribution fee regime.[fn] Payment was requested from 91% of respondents who sought public healthcare, with 83% charged between TRY 250 and 750 per visit; fees for advanced diagnostic procedures in Hatay reportedly reached up to TRY 27,370. The assessment found that 98% of surveyed households had no work permit or social security coverage, while 41% included a member with a chronic illness, rendering these costs unaffordable for households without regular income. Reported coping mechanisms included delaying care until conditions became an emergency, alternating use of ESSN cards among family members, incurring debt or selling belongings, requesting expired or previously-issued prescriptions, and resorting to informal or home-based treatment. Stakeholders further reported that public health facilities largely refused to provide services without upfront payment, that exemption mechanisms for those unable to pay were applied inconsistently, and that reimbursement procedures remained unclear in practice.[1329]

2. Obstacles to access in practice

Syrians with temporary protection registrations in different provinces face several limitations in accessing the public health system.[1330] 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.[1331]

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 process[1332]. Finding appointments can also be challenging.

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

1327 Sputnik Türkiye, *Geçici koruma statüsündeki Suriyelilere sağlık giderleri için 3.5 milyarlık ek bütçe istendi*, 01 August 2024, available here.
1328 PMM, *Faaliyet Raporu 2024; PMM, Stratejik Plan 2024-2028*.
1329 DDD, *Türkiye'de Sağlık Hizmetlerine Erişim Engellerinin Suriyeliler ve Göç Üzerindeki Etkisi*, 02 March 2026, available here.
1330 Information provided by stakeholders, March - April 2024.
1331 Information provided by a stakeholder, March 2024.
1332 Information provided by a stakeholder, May 2023.

and interpreters not translating the patient's complaints and making fun of them.[1333] 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.[1334] In 2024 and 2025, 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.[1335]

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.[1336] 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".*[1337] 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 travel[1338].

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, LGBITQ+, and persons living with HIV, without any partner organizations since June 2024, in five cities.[1339] While exemptions from the contribution fee are formally available to vulnerable groups following an assessment by Social Assistance and Solidarity Foundations, no standardised implementation guidance exists, and field findings indicate exemptions are applied inconsistently in practice.[1340]

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

1333 Information provided by a stakeholder, May 2023.
1334 Information provided by a stakeholder, May 2023; Cagla Aydin, '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.
1335 Information provided by a stakeholder, June 2025
1336 Information provided by a stakeholder, March 2024.
1337 Dünya Doktorları, 2023, *Provision of health protection and resilience of at-risk Syrians and undocumented migrants in Turkey*, available here
1338 Information provided by a stakeholder, March 2024.
1339 UNFPA, *The Key Refugee Groups (KRG) Project continues service provision through 5 Service Units for the furthest behind*, 14 August 2024, available here.
1340 DDD, *Türkiye'de Sağlık Hizmetlerine Erişim Engellerinin Suriyeliler ve Göç Üzerindeki Etkisi*, 02 March 2026, available here.

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.[1341] DDD's research in İzmir and Hatay identified active address registration as a further practical obstacle: 28% of surveyed households reported registration or address-matching problems, a difficulty compounded in Hatay by the presence of container settlement areas and continued post-earthquake administrative pressures, frequently resulting in health facilities demanding full payment or denying services outright. Field findings also pointed to a cyclical dynamic in which upfront fees compound one another: in one documented case, a young mother facing high pharmacy costs following a caesarean delivery could afford only life-sustaining medication and was subsequently unable to attend a required post-partum check due to a consultation fee; when the newborn later developed jaundice, the family could not afford the daily incubator fee and instead attempted informal home-based light therapy. Stakeholders noted that such dynamics are likely to produce broader system-level consequences, including delayed detection of communicable diseases, increased reliance on emergency departments, rising long-term costs, and weakening public health surveillance and institutional trust.[1342]

A research[1343] 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 study[1344] 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.[1345]

A January 2026 report by the Migrants and Refugees Solidarity Network documented a number of additional concerns, including claims that individuals unable to afford medical costs had in some instances been directed toward organ trafficking networks, that some migrants had deliberately sought tuberculosis diagnoses to avoid deportation during the treatment period, and several case studies describing prolonged detention-related health deterioration, denial of dietary and medical needs in removal centres, and instances of mistreatment prior to deportation.[1346]

L. 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".

1341 Information provided by a stakeholder, May 2023.
1342 DDD, Ibid
1343 Kiliç C, Kaya E, Karadağ Ö, Üner S. *Barriers to Accessing Mental Health Services Among Syrian Refugees: A Mixed-Method Study*, Turk Psikiyatri Derg. 2024 Summer;35(2):87-94.
1344 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).
1345 Ulusal Koruma Çalışma Grubu, Ortak 3RP Koruma Sektörü Çalıştayı, 2-3 Ağustos 2023 & Information shared by a stakeholder in April 2024.
1346 İHD, Rapor: *gölgede kalan yaşamlar Göçmen ve Mültecilerin Sağlık Hakkına Erişim Engelleri ve Yaşanan Hak İhlalleri*, 28 January 2026, available here; İlketv, *Gözden kaçan rapor: Göçmenlere sağlık engeli genel halk sağlığını da etkileyecek*, 09 February 2026, available here.

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."[1347]

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".

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.[1348] 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

1347 Article 48 TPR.
1348 Article 30(3) TPR, as inserted by Regulation 2018/11208. The previous provision in Article 23(4) TPR has been repealed by the amendment.

unaccompanied children, but the number of unaccompanied children placed in these institutions has not been made public.[1349]

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.

These guarantees are particularly important in light of the persisting risks of gender-based violence or even death generally affecting women in Türkiye. At least 391 women were killed by men in Turkey in 2025, of whom 297 were recorded as femicides and 94 as suspicious deaths. 253 victims were killed in their own homes. 137 women were killed by a male family member, including 59 by a (former) partner during or after divorce, and 30 by a man they had rejected or sought to separate from.[1350] No disaggregated data are currently available on the nationality or migration status of victims, which limits the ability to assess whether migrant, refugee, or stateless women face disproportionate risks of gender-related killings.

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.[1351]

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 2025, in total there are 151 women's shelters with a capacity of 3,726;[1352] 112 shelters affiliated with the Ministry in 81 provinces provided services with a capacity of 2,819; 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 3 women's shelters affiliated with PMM with a capacity of 80.

1349 Obianet, 'News List', 2023, available here.
1350 TKDF, 2025 Yılı Kadın Cinayetleri, available here.
1351 Eşik, *Eşitlik Sağlanmadıkça Şiddet Artacak*, 23 November 2024, available here.
1352 T.C. Aile ve Sosyal Hizmetler Bakanlığı, *2025 Faaliyet Raporu*, available here.

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.[1353] 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 consequences[1354]. 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.[1355]

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. 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.[1356]

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.[1357]

Stakeholders reported that in 2025 and 2026, access to shelters continued to be conditioned on meeting a certain threshold of severity of violence. A further obstacle was identified in relation to law enforcement practice: when a woman files a complaint against a perpetrator, police officers reportedly inform the perpetrator immediately and summon him to the police station. Both parties are then informed that if they proceed to file cross-complaints against each other, they risk being referred to removal centres. Following this, the victim and the perpetrator are seen off from the police station together.[1358]

1353 Information provided by a stakeholder, March 2024, available here.
1354 Information provided by stakeholders, March – April 2024.
1355 Information provided by stakeholders, March – April 2024.
1356 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.
1357 Information provided by a stakeholder, May 2023.
1358 Information provided by multiple stakeholders, May and June 2026.

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).[1359]

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 2025, 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.[1360]

Conditions in shelters are restrictive and many migrant women leave after a short period of time due to discrimination and psychological violence from other women[1361]. LGBTQI+ women are automatically excluded from these shelters.[1362]

According to statistics shared by the Presidency of Migration Management (PMM), 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. In 2025, 9,349 interviews were conducted, resulting in the identification of 261 victims.[1363]

Throughout 2025, UNHCR and its partners maintained a survivor-centered approach, delivering a broad range of interventions addressing GBV awareness, the empowerment of women and girls, and the reduction of GBV-related risks among both refugee and host populations. The Cash for Protection Programme reached a total of 1,941 individuals, including 43 adolescents transitioning out of child institutions. Community-based initiatives, including GBV awareness-raising sessions, were carried out across several provinces, alongside dedicated psycho-social support, emotional wellbeing, and safety-planning activities that together reached 1,400 individuals nationwide. UNHCR also co-chaired the GBV National Sub-Working Group with UNFPA throughout the year, working to strengthen coordinated prevention and response efforts.[1364]

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. As authorities' responsiveness to refugee women seeking to file complaints against perpetrators remains limited, the effects of funding

1359 PMM, 'İnsan Ticareti İle Mücadele 2023', available here.
1360 Information provided by multiple stakeholders, February and May 2025.
1361 Ibfirnation provided by stakeholders, March – April 2024.
1362 Information provided by a stakeholder, March 2021 and May 2023.
1363 PMM, *Faaliyet Raporu 2025*, available here; PMM, *Statistics*, available here.
1364 UNHCR, *Türkiye - Annual Overview 2025*, January 2026, available here.

cuts have been compounded by the shrinking presence of NGOs able to actively support women in the field. Stakeholders noted that even where an NGO retains a presence but with reduced capacity, a woman is significantly less likely to have her complaint received by the authorities when no NGO representative can accompany her to the police station or courthouse.[1365]

While access to legal aid for refugees remained problematic throughout 2025, stakeholders emphasised that, regardless of how limited resources were, legal aid officers consistently made every effort to ensure that women and girls who had been subjected to, or were at risk of, violence retained legal representation.[1366]

In October 2025, findings from a year-long investigation revealed allegations of sexual abuse and harassment by the owner of a charity aid shop in the Altındağ district of Ankara, an area with a dense Syrian population, where the individual concerned had built a reputation as a trusted community figure providing food and household aid to destitute Syrian women. Seven individuals, including two former employees of the shop, reported having witnessed or received first-hand accounts of the abuse between 2016 and 2024; three women interviewed alleged they had personally been sexually assaulted or harassed while seeking assistance, with several describing being lured to a concealed area of the premises under the pretext of receiving aid. None of the women had filed a police complaint at the time the alleged incidents occurred, citing fear of retaliation, deportation, and social stigma; one woman stated she had been directly threatened with removal to Syria. Official records indicate that a complaint had previously been filed against the same individual in 2019, which was dropped for lack of evidence, and that UNHCR conducted confidential interviews with affected women in 2022 after becoming aware of the allegations. A police raid on the premises followed in 2025, resulting in the shop's temporary closure and further questioning, though the case was again dropped for lack of evidence in June 2025.[1367] Later, the owner was detained.[1368]

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 among girls under the age of 18.[1369] In 2023, it is observed that there is an increase on child marriages, especially in the earthquakes-affected area[1370].

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.[1371] 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.[1372]

1365 Information provided by multiple stakeholders, April and May 2026.
1366 Information provided by multiple stakeholders, March, April and May 2026.
1367 BBC Türkçe, *Seks karşılığında yardım: Suriyeli kadınlar, Ankara'daki hayır mağazası sahibini cinsel tacizle suçladı*, 20 October 2025, available here.
1368 BBC Türkçe, *BBC Türkçe'nin araştırmasında Suriyeli kadınlara cinsel istismarla suçlanan Sadettin Karagöz tutuklandı*, 23 October 2025, available here.
1369 Information provided by a stakeholder, May 2023.
1370 Information provided by stakeholders, March – April 2024.
1371 *Ibid*, page 7.
1372 *Ibid*, page 8.

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.[1373] 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.[1374]

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.[1375]

Stakeholders noted that in 2025 and 2026, a considerable number of individuals were found to be living in second or third marriages, a practice that typically remained undisclosed until it surfaced through bureaucratic obstacles encountered in relation to their children, such as birth registration.[1376]

A 2025 investigation highlighted that polygamous marriages involving Syrian women remain widespread and largely unaddressed in Türkiye, with Hacettepe University data indicating that roughly one in ten Syrian women over 15, and one in eight over 30, are in such a marriage. Academics interviewed described these unions as frequently entered into out of extreme economic and physical vulnerability rather than free consent, with several cases documented in which Syrian mothers lost parental recognition after children were registered under the husband's legally married first wife. The report also noted that affected women

1373 Information provided by a stakeholder, May 2023.
1374 Information provided by a stakeholder, February and March 2025.
1375 Information provided by a stakeholder, May 2023.
1376 Information provided by a stakeholder, June 2026

rarely seek help from Turkish authorities for fear of stigma, and that a 2016 government-commissioned study had already flagged the issue as a "serious concern" without any resulting action plan to date.[1377]

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 still pending.[1378] 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.[1379] 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.[1380] 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.[1381]

According to the study conducted by the Red Umbrella Association, Syrian sex workers are stigmatised 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 problem[1382].

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. LGBTQI+ 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.[1383] 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.[1384]

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

1377 DW Türkçe, *Suriyelilerle poligami: Kızlarımı nikahlamak isteyen var mı?*, 20 August 2025, available here.
1378 Information provided by a stakeholder, June 2023.
1379 Information provided by a stakeholder, June 2023.
1380 Information provided by a stakeholder, April 2025.
1381 Information provided by a stakeholder, June 2023.
1382 Gerçek Gündem, ‘Araştırma: Türkiye’deki yabancılar (2) Suriyeli seks işçileri Türkiye’de neler yaşıyor?’, 19 July 2023, available here.
1383 Information provided by a stakeholder, June 2023.
1384 Information provided by s stakeholder, June 2023.

care problems and wish to leave Türkiye as soon as possible.[1385] 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.[1386]

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 Kahramanmaras, 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 access[1387]. In 2024, a Syrian transgender woman was stigmatised, apprehended and then 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.[1388]

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.[1389]

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

1385 Open Democracy, 'I Am Not Your Refugee: From All Over: LGBTQ Türkiye', 6 October 2022, available here.
1386 Information provided by a stakeholder, June 2023.
1387 Information provided by s stakeholder, March 2024.
1388 Evrensel, EMEP Milletvekili Sevda Karaca: GGM'ler göçmenler için cezaevine dönüştü, 19 December 2023, available here.
1389 Mülteci-Der, Boşluk ve Düzensizlik Arasında Suriyeli Trans Kadın Mültecilerin İzmir'deki Durumu, 01 December 2024, available here.

work and refrain from registering out of fear of being discriminated by the public authorities.[1390] 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 Kültür[1391] 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.[1392]

For further detailed information see AIDA Türkiye 2024.

1390 Information provided by a stakeholder, May 2023.
1391 Kirkayak Kültür, February 2024, "We started from zero, we returned to zero again…", available here.
1392 Minority Rigts Group, *Report on the monitoring of discrimintion experienced by dom, abdal and roma people ın southern Türkiye following the 2023 earthquake*, 2023, available here; Bianet, *Depremlerin ardından yükselen ayrımcı ve ötekileştirici uygulamalar | Rom, Dom, Lom ve Abdallar*, available here.