

**RESPOND**

## **Working Papers**

### **Global Migration: Consequences and Responses**

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## **Integration Policies – Trends, Problems and Challenges**

**An Integrated Report of 9 Country Cases**

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## List of Abbreviations

<b>DGMM</b>	<b>Directorate General of Migration Management (Turkey)</b>
<b>EU</b>	European Union
<b>ICESCR</b>	International Covenant on Economic, Social and Cultural Rights
<b>IIP</b>	Individual Integration Program
<b>ILO</b>	International Labour Organisation
<b>ICESCR</b>	International Covenant on Economic, Social and Cultural Rights
<b>IOs</b>	International Organizations
<b>IR</b>	Implementation Regulation (Turkey)
<b>KRG</b>	Kurdistan Regional Government
<b>KRI</b>	Kurdistan Region of Iraq
<b>LFIP</b>	Law of Foreigners and International Protection (Turkey)
<b>MoI</b>	Ministry of Interior
<b>MOLSA</b>	The Ministry of Labour and Social Affairs
<b>MSs</b>	Member States
<b>NGOs</b>	Non-governmental organizations
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>PCMOI</b>	Permanent Committee for Refugee Affairs of Ministry of Interior (Iraq)
<b>PES</b>	Public Employment Services (Greece, Sweden)
<b>RESPOND</b>	Multilevel Governance of Migration in Europe and Beyond
<b>RIES</b>	Refugee Integration and Employment Service (England)
<b>SPRAR</b>	System for the Protection of Asylum Seekers and Refugees (Italy)
<b>TPR</b>	Temporary Protection Regulation (Turkey)
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>ZUS</b>	Social Insurance Institution (Poland)

## About the project

RESPOND aims at studying the multilevel governance of migration in Europe and beyond. The consortium is formed of 14 partners from 11 source, transit and destination countries and is coordinated by Uppsala University in Sweden. RESPOND studies migration governance through a narrative which is constructed along five thematic fields:

- (1) Border management and security;
- (2) Refugee protection regimes;
- (3) Reception policies;
- (4) Integration policies, and
- (5) Conflicting Europeanization.

Each thematic field is reflecting a juncture in the migration journey of refugees and designed to provide a holistic view of policies, their impacts and responses given by affected actors within.

Read more about the project: [www.respondmigration.com](http://www.respondmigration.com)

## Acknowledgements

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# 1. Introduction

Five years ago, more than one million people crossed into Europe undertaking dangerous journeys in an effort to escape civil war, to find a safe place to live and to build a better future. In the initial phase, policy responses to this unprecedented scale of human movement were emergency oriented. We witnessed remarkable examples of solidarity and acts of welcome shown to people fleeing war zones. Over time, this welcoming approach changed. With the powerful articulation of far-right populist discourses, opposition to immigration has become a significant political issue in many countries. Consequently, the policy responses shifted towards securitization of migration: countries strengthened their borders, built fences and applied stricter migration control regimes.

Tightening entry rules, introducing hard external borders and externalizing migration control regimes have become the new *modus operandi* for the governance of migration. Simultaneously, domestically, many countries have introduced more restrictive regulations for immigrant integration. Restrictive policies should be understood in the context of the rise of populism, in which migration is constructed as the main scapegoat of all societal failures. This has been well-studied and documented (see i.e. Schain 2018, Akkerman 2018). What is interesting for our topic is the impact of this socio-political context on people's settlement and integration trajectories in their new countries.

The second remarkable impact of recent migration is that integration as a socio-cultural, economic and political topic is no longer a policy issue merely pertinent to the so-called 'destination' countries in the West, particularly for North-West European countries. Today, integration is also a relevant topic in many refugee receiving countries, both in the South-South migration context and in transit countries. Due to the entrapment of refugees facing strict border controls, these countries have faced the challenge of developing new measures to meet the basic needs of refugees, especially in the labour market and with regards to education and housing. This is relatively a new policy field for these countries, but in our understanding will have broad consequences for the way we study the different dynamics of integration in the future.

The third significant consequence of recent migration is the approach to 'integration' that we observe. Our research reveals three vital points:

- (1) Today many scholars, policymakers and practitioners agree on the relation between psychosocial health of refugees, social determinants and participation in a new society. Refugees, the subject of integration policies, usually carry the baggage of a traumatic past. Their traumas are exacerbated during their journey and also with post-migration stressors, triggered by everyday life experiences and their encounters with society and institutions in a new country. Still, the psychosocial wellbeing of refugees has been a challenging factor for many Western countries in which integration policies are primarily built upon labour market policies. In this regard, RESPOND research has shown the importance of paying attention to how the health and wellbeing of people arriving in a new country is related to their integration, and also how health issues before and during migration play an on-going vital role.
- (2) Delineating the topic of immigrant integration from broader societal issues is a common failure of policymaking. Immigrant integration is intrinsically connected to culture, race, class, and gender dimensions. Schinkel (2018) in his critical article explains how the individualist (neo)liberal assumptions of society and the distorted understanding of 'integration' refined from the notions of class and race maintain a 'classed and raced form of dominance'. The ontological problem with existing perceptions of integration is related to the projection of society as a 'pure domain' (without problems) and the externalization of problematic subjectivities (e.g., migrants, their children, unemployed persons, or convicted criminals) who

are residing 'outside society and need to be integrated' (Ibid.). While a holistic understanding is needed for studying integration, a close eye on ethnicity, class, and gender differences is of the utmost importance.

- (3) The focus of policymaking should be shifted from security to human centred approaches. In our research, we have observed a remarkable gap between policies and the experiences of newcomers, which is one of the main reasons for the shortcomings of policies.

## Outline

This report will introduce some of the primary findings, trends and challenges with regard to immigrant integration that have been discussed in nine country reports (see below the full list) based on research conducted within the framework of the Horizon2020 RESPOND project. These countries are Sweden, Germany, Italy, Greece, Austria, Poland, the UK, Turkey and Iraq. All nine country reports study integration in five thematic domains (labour market, education, housing, psychosocial health and citizenship) by looking at policies (macro level), practices (meso) and experiences of refugees and asylum seekers (micro level). This integrated report relies on data discussed in the macro sections of these country reports, and systematically analyses the same thematic fields in each country by looking at:

- a) Legal and policy frameworks for each thematic field (labour market, education, housing, psychosocial health, and citizenship);
- b) The main trends in these domains, and
- c) Problems and challenges that refugees face (based on the interview material at micro and meso levels).

Each section ends with an informative summative table. Overall, the integrated report provides a rich overview of country cases, and thus, can be read either as a whole or as separate sections. The report comes as part of a series published within Work Package #5 of the RESPOND project, which consists of nine country reports, five thematic comparative reports, and a large quantified dataset. We recommend those who are interested in certain country cases and/or thematic fields read the other relevant publications in this series (links are available in the reference list).

In the report, the terms 'asylum applicant', 'asylum seeker' and 'refugee' are used interchangeably to refer to the integration and settlement experiences of displaced individuals who have sought refuge in the countries discussed.

### Country Reports

Atto, N., Hirst, C. and Hall, V. (2020, July 14). *Integration Policies, Practices and Experiences – United Kingdom Country Report* (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3945509>

Cetrez, O., DeMarinis, V., Pettersson, J. and Shakra, M. (2020, July 19). *Integration Policies, Practices and Experiences – Sweden Country Report* (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3951714>

Chemin, J.E. and Nagel, A.K. (2020, June 3). *Integration Policies, Practices and Experiences – Germany Country Report* (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3874426>



- Ibrido, R. and Marchese, C.. (2020, June 15). *Integration Policies, Practices and Experiences– Italy Country Report* (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3894103>
- Josipovic, I. and Reeger, U.. (2020, June 17). *Integration Policies, Practices and Experiences – Austria Country Report* (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3898430>
- Leivaditi, N., Papatzani, E., Ilias, A. and Petracou, E.. (2020, June 9). *Integration Policies, Practices and Experiences – Greece Country Report* (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3886993>
- Rottmann, S.B. (2020, May 30). *Integration Policies, Practices and Experiences – Turkey Country Report* (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3865824>
- Sobczak-Szelc, K., Pachocka, M., Pędziwiatr, K. and Szałańska, J.. (2020, August 30). *Integration Policies, Practices and Experiences – Poland Country Report* (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4008666>
- Warda, W.K. and Almajraji, H.S.. (2020, September 8). *Integration Policies, Practices and Experiences – Iraq Country Report* (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.4019804>

## 2. Labour Market Integration

This section discusses the labour market integration of asylum seekers and refugees based on the macro section of the country reports of Austria, Germany, Greece, Iraq, Italy, Poland, Sweden, Turkey, and UK. Country reports outline the legal-policy framework of the labour market integration of asylum seekers and refugees, including the main trends, problems and challenges faced mainly at macro level.<sup>1</sup>

The ability to engage in decent work is recognized as a fundamental human right, which is included in the Universal Declaration of Human Rights (1948)<sup>2</sup> as “Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment (Article 23(1)). This right is also recognized in international human rights law with the International Covenant on Economic, Social and Cultural Rights (1966/ ICESCR)<sup>3</sup> in Article 6(1), which states, “the States Parties to the present Covenant recognize the right to work, which includes the right of everyone to the opportunity to gain his living by work which he freely chooses or accepts, and will take appropriate steps to safeguard this right”. The ICESCR states further responsibilities for the signatory sides in Article 6(2), which are to provide, “technical and vocational guidance and training programmes, policies and techniques to achieve steady economic, social and cultural development and full and productive employment” for all individuals.

This fundamental right is also recognized and guaranteed for the beneficiaries of international protection. The right to work is vital for reducing vulnerability and enhancing resilience among asylum seekers and refugees. The 1951 Refugee Convention<sup>4</sup> acknowledges the importance of socio-economic rights for refugees, guaranteeing the right to work and participate in the labour market with several provisions such as the right to wage earning employment (Article 17), the right to self-employment (Article 18), the right to practice a liberal profession (Article 19) and the right to benefit from labour regulations (Article 24). However, Article 17 of the Convention only grants refugees who are lawfully staying in the territory the right to take up employment under the same conditions as the most favoured foreigner. Even this has not been the case in practice, at least for the RESPOND countries, which has been highlighted in RESPOND’s country reports. The 1951 Convention also requires equal treatment with nationals in access to employment (European Commission, 2018: 2).

The failure to grant this fundamental right hinders the ability of beneficiaries of international protection to successfully integrate into their new societies, and leaves them at risk of destitution (ECRE, 2016: 2). Furthermore, it may result in beneficiaries of international protection engaging in irregular work in dangerous and degrading conditions (Ibid.).

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<sup>1</sup> In a separate thematic report, the micro level experiences of asylum seekers and refugees in the labour market is also provided.

<sup>2</sup> The Universal Declaration of Human Right is available at: [https://www.ohchr.org/EN/UDHR/Documents/UDHR\\_Translations/eng.pdf](https://www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/eng.pdf) [Accessed 7 August 2020].

<sup>3</sup> The International Covenant on Economic, Social and Cultural Rights available at: <https://www.ohchr.org/Documents/ProfessionalInterest/cescr.pdf> [Accessed 7 August 2020].

<sup>4</sup> The 1951 Refugee Convention relating to the Status of Refugees is available at: <https://www.unhcr.org/3b66c2aa10> [Accessed 9 August 2020].

In addition to the above-given international legal framework for the right to work and access the labour market, the majority of RESPOND countries<sup>5</sup> are members of the European Union (EU) and are subject to the relevant EU *acquis* legal framework.

The Reception Conditions Directive<sup>6</sup> Article 15(1) states that “Member States shall ensure that applicants have access to the labour market no later than 9 months from the date when the application for international protection was lodged”. However, until then, the timing of access to the labour market for asylum seekers and the type of access to the labour market depends on the Member States’ (MSs) regulations (Article 12): “Member States shall decide the conditions for granting access to the labour market for the applicant, in accordance with their national law, while ensuring that applicants have effective access to the labour market”. However, a look at unemployment rates in EU countries shows that priority is given to those countries’ nationals, EU citizens and nationals of the Agreement on the European Economic Area (Article 13(2)).

The Qualification Directive<sup>7</sup> Article 26(1) states that “Member States shall authorise beneficiaries of international protection to engage in employed or self-employed activities subject to rules generally applicable to the profession and to public service, immediately after protection has been granted”. In almost all RESPOND countries, the Members are to ensure that all the needed activities and opportunities, such as “employment-related education opportunities for adults, vocational training, including training courses for upgrading skills, practical workplace experience and counselling services” are provided to beneficiaries of international protection (Article 26(2)).

In order to access the labour market, the recognition of qualifications is of the utmost importance, and this is regulated by the Professional Qualifications Directive<sup>8</sup> for EU members, amended by the Directive in 2013 (2013/55/EU)<sup>9</sup>.

Before commencing with descriptions of country cases, it should be noted that the different RESPOND country reports provide different details about their cases, due to data availability issues. For example, in general, national statistics can be obtained for the employment rates of foreign-born people, but they often do not disaggregate between those with refugee or asylum seeker status. Sometimes even that data is not accessible.

To provide a general overview before delving into the individual country cases, the below given figure illustrates the unemployment rates for native-born, EU-born and non-EU-born individuals in RESPOND countries (except Iraq and Turkey).

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<sup>5</sup> For this integrated report, nine RESPOND countries are focused: Austria, Germany, Greece, Iraq, Italy, Poland, Sweden, Turkey, UK). Among them, the UK, Turkey, Lebanon and Iraq are not the EU-members; while only Iraq is not a signatory part of the 1951 Convention and its 1967 Protocol.

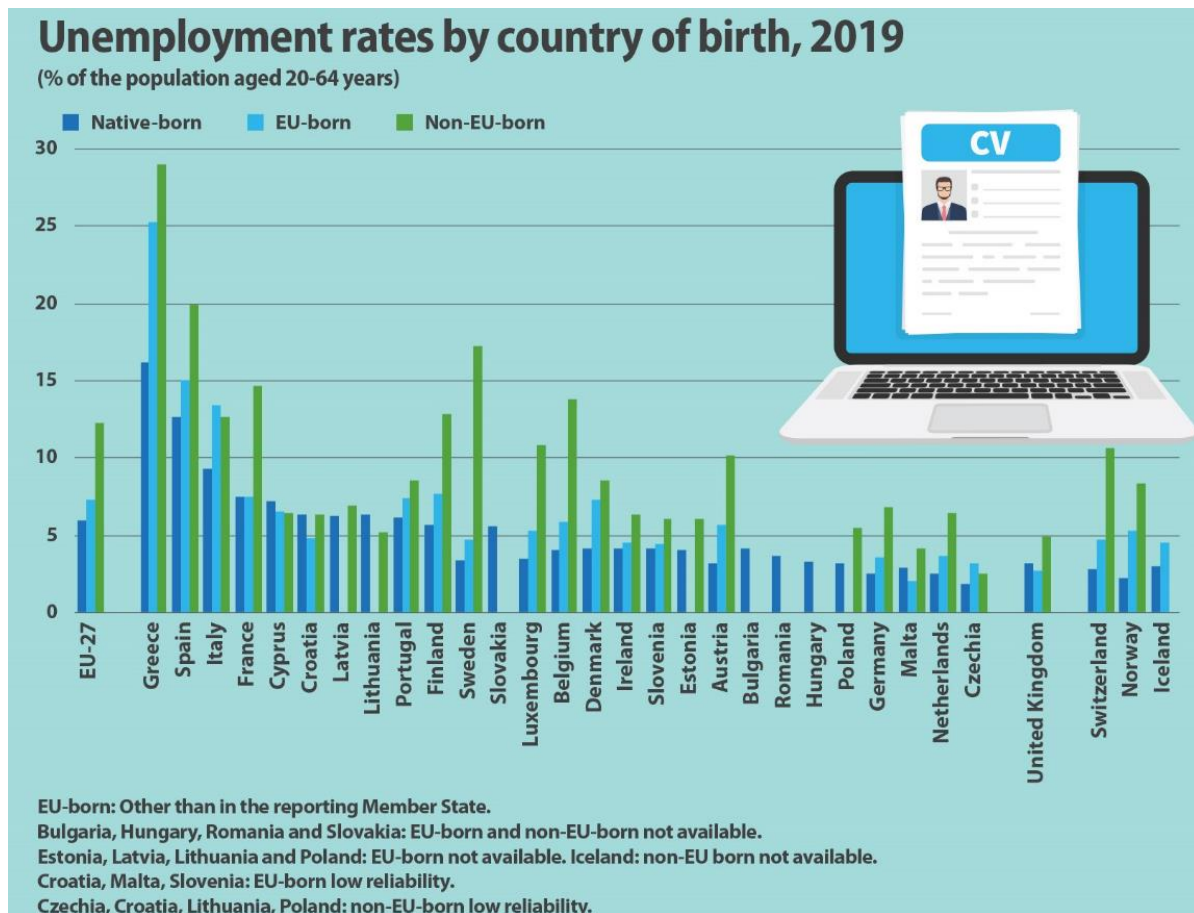
<sup>6</sup> Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013L0033&from=EN> [Accessed 12 August 2020].

<sup>7</sup> Directive 2011/95/EU of the European Parliament and of the Council of 13 December 2011 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection, and for the content of the protection granted, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0095&from=EN> [Accessed 12 August 2020].

<sup>8</sup> Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32005L0036&from=EN> [Accessed 12 August 2020].

<sup>9</sup> Directive 2013/55/EU of the European Parliament and of the Council of 20 November 2013 amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation (EU), Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013L0055&from=EN> [Accessed 12 August 2020].

Figure 1: Unemployment Rates by Country (2019)



Source: EUROSTAT. 2020. "Migrant Integration Statistics: Labour Market Indicators".

The unemployment rate for foreign-born populations is published by the OECD (and also includes Turkey) (Table 1). However, this table does not distinguish between refugees and non-refugees specifically.

Table 1: Foreign-Born Unemployment

Country	Latest Rate	Country	Latest Rate
Australia	5.50	Lithuania	7.40
Austria	9.40	Luxembourg	6.40
Belgium	11.50	Mexico	4.10
Canada	6.40	Netherlands	7.00
Chile	5.80	New Zealand	4.10
Czech Republic	2.50	Norway	7.90
Denmark	9.80	Poland	4.70

<b>Estonia</b>	7.90	<b>Portugal</b>	8.50
<b>Finland</b>	14.10	<b>Slovak Republic</b>	5.20
<b>France</b>	14.60	<b>Slovenia</b>	6.50
<b>Germany</b>	6.00	<b>Spain</b>	20.70
<b>Greece</b>	28.60	<b>Sweden</b>	15.70
<b>Hungary</b>	4.60	<b>Switzerland</b>	7.90
<b>Iceland</b>	5.10	<b>Turkey</b>	12.10
<b>Ireland</b>	7.20	<b>United Kingdom</b>	4.70
<b>Israel</b>	3.50	<b>United States</b>	3.50
<b>Italy</b>	13.70		
<b>Latvia</b>	7.70		

**Source:** OECD. 2020. “Foreign-born Unemployment”. The countries covered in this report are marked with red)

Below is detailed information about each country (in alphabetical order). In each case we have looked at the legal and institutional framework, the main trends and the main problems and challenges in relation to the labour market integration of asylum seekers and refugees. Furthermore, at the end of this section, a country-based overview (Table 2) is provided.

## 2.1 Country Cases

### AUSTRIA<sup>10</sup>

#### Legal and Institutional Framework

Integration is a strongly institutionalized, but also relatively new policy field in Austria (Josipovic and Reeger, 2020: 15). In terms of legal framework, the Integration Agreement of 2002 which is part of the Settlement and Residence Act is the first legal document obliging new immigrants (non-EU, but the third country nationals) to participate in integration courses.

In particular, for labour market access, the Federal Basic Welfare Support Act of 2005 (No.100/2005) and the Aliens Employment Act (No. 218/1975), are the two main documents that provide conditions for accessing the labour market (Ibid.: 22). Accordingly, asylum seekers have the opportunity to access the labour market three months after making their application, but they are subject to prohibition of employment before this period. Also, after that time period, asylum seekers have access only to certain selected sectors and jobs. In 2012 and 2013, new decrees provided apprenticeship opportunities for asylum seekers under age 26 with some conditions, such as a lack of availability of Austrian or EU citizens for the apprenticeship (European Commission, 2016a: 7). However, as soon as asylum seekers are accepted as refugees or have obtain subsidiary protection status, they have unrestricted access to the Austrian labour market. Yet, due to long waiting times in the asylum process and the fact that asylum seekers are excluded from the labour market during this time, there is a long period of unemployment. It

<sup>10</sup> Josipovic, I. and Reeger, U. (2020, June 17). Integration Policies, Practices and Experiences – Austria Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3898430>

should be noted that this is a violation of the Reception Conditions Directive (2013/33/EU) that urges Member States to provide affective access to the labour market for asylum seekers, no later than nine months (Josipovic and Reeger, 2020: 22). Nevertheless, the Austria country report states that despite this deficiency, once asylum seekers are granted refugee or subsidiary protection status, they have full access to the labour market. Even if they are not working, if they are above the age of 15, they are obliged to participate in integration courses (Ibid.: 23).

Following the increasing numbers of forced migrants in 2015, the federal government presented a 50-point plan in particular for the integration of refugees and subsidiary protection beneficiaries (Ibid.: 30), which provides measures regarding education, labour market participation and housing. New “competence checks” were introduced for assessing the skills of asylum seekers and refugees before their accession into the labour market (Ibid.: 29). Additionally, the 2016 Act on Recognition and Evaluation is significant for facilitating the recognition of diplomas and qualifications of asylum seekers and refugees (Ibid.: 23).

In terms of actors and the institutional structure, the Federal Ministry of the Interior (MoI) has a platform for integration whereby the relevant ministries and the other state and non-state organisations are represented (Josipovic and Reeger, 2020: 16). This platform was established in 2007 and followed up by the creation of a Council of Experts. In 2011 a special Secretariat for Integration was established under the mandate of the MoI, and this then came under the mandate of the Ministry of Foreign Affairs in 2015. The report presents the Federal Ministry of Labour, Social Affairs, Health and Consumer Protection as the highest institutional levels of management for labour market participation. But, due to the federal structure of Austria, the sub-national levels and their administrative structure consisting of local actors is also important.

## **Main Trends**

In the 1960s, Austria received a high number of foreign workers from southern Europe, however the development of immigrant integration policies is relatively recent, gradually evolving through several acts since the 2000s. In relation to labour market integration, there are three main groups of concern, namely Third-country nationals, immigrant populations of former labour migrants (guest labours) and their descendants (mainly from Spain, Turkey, and the former Yugoslavia) and EU-citizens and the recent asylum seekers and refugees (mainly from Afghanistan, Syria and Iraq) (Josipovic and Reeger, 2020: 18). However, the asylum system appears to be the main population, since Austria received a large number of persons- 88,000 applicants for asylum in 2015 (Ibid.).

National identity, cultural norms and values are sine qua non-elements in Austria’s current integration model, which has taken a restrictive turn in recent years. Particularly, regarding “Islam”, the country report states that there is an observable security nexus (Ibid.: 16-18 and 35). In general, integration and labour market access are quite politicized, and the recent federal government has been criticized for abolishing some of the previously given rights, such as apprenticeship positions for immigrants and asylum seekers. There are some limitations for some sectors whereby they restrict access to the labour market, including apprenticeship, until the recognition of refugee or subsidiary protection statuses. Another important conclusion made in the country report is that asylum seekers and refugees face many problems and challenges in the beginning of the asylum process, but at a later stage they manage to catch up with the other segments of society in terms access to and participation in the labour market (Ibid.: 24).

## *Unemployment*

The country report states that since 2018, there has been a decrease in unemployment, but still while the unemployment rate is 7.7% for Austrians, it is 40.7% for Afghans, Syrians and Iraqis, who are the most populous refugee groups (Josipovic and Reeger, 2020: 24).



## Main Problems and Challenges

- Due to legal regulations, asylum seekers have restricted access to the labour market. Long lasting asylum procedures are the main reason for the long absence of refugees from the labour market (Josipovic and Reeger, 2020: 22, 25).
- Although the poor language proficiency is highlighted as one of the major barriers for labour market access, the report also states that lack of language proficiency is used as an alleged excuse to cover other discrimination (Ibid.: 28-29)
- Recognition of qualifications is mentioned as one of the major problems with the Austrian system. In particular, for refugees, the need to provide required documents for recognition of qualifications generates additional difficulties (Ibid.: 29).
- In terms of the gender dimension, bans on headscarves and similar limitations appear to be detrimental for successful access to the labour market (Ibid.: 28).
- Another obstacle faced by asylum seekers and refugees is a lack of migrant networks in Austria. which are often very helpful in finding a new job (Ibid.: 27).
- Another challenge that migrants face is a lack of knowledge about the national labour system, in particular regarding the necessary requirements and qualifications for different jobs and professions (Ibid.: 25).
- Regional differences regarding labour market access and provided opportunities are also noted in the report, meaning that barriers are highly variable.

## GERMANY<sup>11</sup>

### Legal and Institutional Framework

The current legal framework for labour market participation is formed around Asylum Packages I and II, the Integration Act of 2016 and the Masterplan Migration (Chemin and Nagel, 2020: 15). Thanks to the Act on the Acceleration of Asylum Procedures (2015), which aims at accelerating asylum applications, asylum seekers with a good prospect of staying in Germany have access to integration measures that facilitate quick integration into the labour market (European Commission, 2018, p. 3). However, those who come from safe countries of origin are not allowed to work and have no access to integration measures (Ibid.). The 'Integration Law' of 2016 also provided more support to some groups (especially to those with a good prospect of staying) for 'easier' and 'quicker' access to the German labour market. In line with this, several measures were introduced, including easier access to integration courses covering language training and civic orientation, job placement services and targeted support for vocational training. The law also subsidised "work opportunities" that do not constitute formal employment, but which seek to activate asylum seekers and provide a first insight into working life in Germany (Chemin and Nagel, 2020).

In the German system, refugees' access to the labour market depends on their legal status (Ibid., p. 23). All refugees have the right to work in Germany but they need to be in the country for at least three months and apply for an initial work authorization. In order to be approved, their employment should not create a negative impact on the employment of German nationals, the EU citizens, or permanent residents. After the approval, no restrictions are foreseen for a period of three years, and after three years, they can apply for permanent residency status. This means access to an unrestricted work permit. After a general waiting period of three months, asylum seekers and refugees can apply for a work permit at the immigration authority (Ibid.). However, during this period, if a person is not subject to compulsory education, but can work, the person

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<sup>11</sup> Chemin, J.E. and Nagel, A.K. (2020, June 3). Integration Policies, Practices and Experiences – Germany Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3874426>

is also obliged to participate in early integration measures, such as integration courses, preparatory language, vocational training or internships.

The field of integration politics and governance in Germany is highly complex. The cross-cutting nature of integration policy reflects that fact that various federal ministries have responsibilities in the area. Policy making and monitoring largely take place at the federal level, while actual implementation takes place at the level of regional states and municipalities (Chemin and Nagel, 2020: 16). Regarding integration, there are 8 federal ministries, and among them the Ministry of the Interior, the Ministry of Economic Affairs, the Ministry of Labour and Social Affairs and the Ministry of Economic Cooperation and Development are the most important ones pertaining to labour market integration. In addition, the Federal Office for Migration and Refugees, which is a division of the Ministry for the Interior, as well as the Federal Commissioner for Migration, Refugees and Integration are significant actors (Ibid.: 17). In addition to state actors, IOs, INGOs and NGOs also have important roles in terms of labour market integration of immigrants and refugees and they provide training activities and livelihood programmes.

## **Main Trends**

Despite its post-World-War-II history with the immigration guest workers, Germany has no coherent strategy or policy of integration; rather the country has adopted ad-hoc policies with a wide usage of the term “guest workers” (Chemin and Nagel, 2020: 7). Even the usage of this term indicates that the right to stay is conditional and requires appropriate behaviour (Ibid.: 13). However, the case of refugees is different from the case of Germany’s historical labour migrants, not only in terms of its scale, but also because many asylum seekers come from countries where the possibility of return is limited (OECD, 2017: 11).

As a general trend, since 2016, integration measures have been implemented with a paternalistic logic of retaining control over refugees (Ibid.: 25). In addition, approaching refugees as to their economic value is one of the main parameters in relation to the labour market. The “usefulness” of asylum seekers has been emphasized as threatening a humanitarian approach to international protection (Ibid.: 9).

A new reception policy paradigm, which has been formulated as “integrated refugee management” builds on strategies of isolation and deterrence through centralized accommodation (Ibid. 8). There are some advantages to these centralized accommodation centres in terms of work opportunities for refugees; however, in general the positions they can obtain there are quite low paid and may curtail their labour market integration outside of the centres. The German system’s protectionist approach regarding German employees vis-à-vis the potential hiring of refugees or asylum seekers means that migrants have disadvantages in terms of finding jobs and compete with German citizens.

## *Unemployment*

Due to the needs of the German labour market and shortages in many areas, asylum seekers and refugees are doing relatively better in Germany than they are in some other European countries. The German country report states that in comparison with previous periods, despite the high level of applications, the unemployment rate has remained stable due to measures at the macro level (Chemin and Nagel, 2020: 21, 31). As of July 2020, 7.1% of the total civilian labour force is unemployed, compared to 5.4% in 2019 (DESTATIS, 2020). As of August 2020, the unemployment rate of foreign-born was 14.4 percent (STATISTA, 2020a). In terms of refugees, refugee unemployment has been ranking between 180,000-230,000 since 2016 (Chemin and Nagel, 2020: 22).



## Main Problems and Challenges

- The report states that there is a considerable mismatch between the level of employment in the countries of origin and in Germany. Refugees can only find jobs below the level of their previous employment in the country of origin (Chemin and Nagel, 2020: 22).
- Language barriers appear to be one of the biggest challenges, despite some positive initiatives (e.g., new integration courses, where language competences are a heavy focus (Ibid.).
- Gender bias and higher unemployment rates for women are observed and can be attributed to gender inequalities in terms of care and family childcare duties (Ibid.).

## GREECE<sup>12</sup>

### Legal & Institutional Framework

The first document outlining comprehensive social integration of third-country nationals is the Law 3386/2005 of 2005, which focuses on entry, accommodation and social integration of asylum seekers and refugees (Leivaditi et al., 2020: 13). Following the EC's European Agenda for the Integration of Third-Country Citizens in 2011, the first National Integration Strategy for third-country nationals was adopted in 2013 and renewed in 2018 (Ibid.). The Strategy states, "the management of legal migration is based on the needs of the labour market" (Ibid.: 14); while its renewed version also calls on the state to secure all of the prerequisites for integration, including access to the labour market (Ibid.).

One of the most recent legal frameworks is the Migration and Social Integration Code (Law 4251/2014), which regulates the basic law regarding integration, including the conditions for accessing the labour market. Further labour market specific arrangements were also adopted in 2016 and 2018. Article 71 of Law 4375/2016 and Article 15 of Law 4540/2018 provide asylum seekers the opportunity to immediately access the labour market as employees, service or work providers from the moment they lodge an asylum application and are provided with an asylum seeker card (Ibid.: 17). Before this legal arrangement, as in many RESPOND countries, asylum seekers had to obtain a work permit and priority was given to Greek and EU citizens (Presidential Decrees 189/1998, 220/2007) (Ibid.: 17). The situation changed when Law 4636/2019 came into force in January 2020, and this immediate access to the labour market was limited. The law introduced a six-month waiting period before asylum seekers could access the labour market (Article 53). Thus, the employment access of asylum seekers is restricted. However, when their legal statuses are defined as refugees or as subsidiary protection beneficiaries, they then have access to wage employment or self-employment on the same terms and conditions that apply to Greek citizens, according to Article 69 of Law 4375/2016, which is also confirmed by Article 27 of Law 4636/2019 (Ibid.).

In terms of recognition of qualifications, beneficiaries of international protection are treated in the same way as Greek citizens, and if they cannot provide evidence of their qualifications, the relevant Greek authorities are expected to facilitate the process according to Article 29 of Presidential Decree 141/2013 (Ibid.). Furthermore, Law 4540/2018 provides conditions for the assessment of the skills of asylum seekers who do not have the necessary documentation according to Article 16 of the Joint Ministerial Decision, which is also recognized by a recent legal development, Law 4636/2019 (Article 54) (Ibid.: 17).

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<sup>12</sup> Leivaditi, N., Papatzani, E., Ilias, A. and Petracou, E. (2020, June 9). Integration Policies, Practices and Experiences – Greece Country Report (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3886993>

In terms of institutional structure, Law 4375/2016 Article 31 established the Directorate for Social Inclusion, which expands integration policy for beneficiaries of international protection. This was followed by Law 3536/2007, which established the National Committee for social integration. The Ministry of Migration Policy was established with Presidential Decree 123/2016, which aimed at the administrative, institutional and symbolic upgrading of the management of migration, asylum and promotion of the social integration of refugees and migrants. This entity was replaced by the Ministry of Migration and Asylum in 2017, and in the same year, the Directorate for the Protection of Asylum seekers was established (Leivaditi et al., 2020: 16).

## **Main Trends**

In general, integration policies have been developed rather recently. The policy framework for refugee integration in Greece is underdeveloped including with regards to labour market integration. Greece has adopted intensively from the EU *acquis* and relative to the other EU members is a latecomer in putting integration on the policy agenda. The integration of refugees has mostly remained on paper with significant problems in practice (European Commission, 2016b: 15).

Until the end of 2019, asylum seekers had access to the labour market as employees, service or work providers as soon as they had formally applied and obtained their asylum seekers card (AIDA, 2020a); however, starting from 2019, we also observe restrictions to accessing the labour market, such as 6 month waiting periods. In addition, since 2018, the economic conditions that started to prevail in Greece created a negative impact on refugees (Ibid.).

### *Unemployment*

The unemployment rate of foreign nationals, for the period of 2008-2016, is recorded as 24.26%, which was higher than the unemployment for the general population (23.61%) (Belegri-Roboli et al., 2018: 44). This rate dropped from 19.1% in July 2018 to 16.9% in July 2019 (Hellenic Statistical Authority 2019 cited in AIDA, 2020a).

## **Main Problems and Challenges**

- One of the most important problems is the 6-month time restriction and the requirement to complete full registration in terms of the asylum application, which has been the case since the beginning of 2020.
- Barriers include lack of information, high unemployment rates, lack of required documentation (e.g. residency permits, passport), language barriers, the remoteness of some sites from cities, and lack of job advice and placement support (AIDA, 2020a).
- Asylum seekers have significant obstacles to opening bank accounts, including those dedicated for the payment of their salaries, which are a precondition for payment in the private sector, similar to acquiring a social security number, which is a requirement for employment (Leivaditi et al., 2020).
- Employers are reluctant and sometimes entirely unwilling to recruit asylum seekers because of the risk of penalties in case of any legal problem (Ibid.).
- There are problems in practice for participation in vocational trainings under the same conditions and prerequisites as for Greek nationals, which is a guarantee according to the Article 17(1) L 4540/2018 (Ibid.).

## IRAQ<sup>13</sup>

### Legal and Institutional Framework

Iraq is not part of the 1951 Convention and 1967 Protocol. Despite the existence of a draft law prepared in 2017, the only legal document is the Political Refugees Law No. 51 of 1971, which addresses political refugees and guarantees them the same social and economic rights as Iraqi citizens, including the right to work and participate in the labour market (Warda and Almajraji, 2020: 16, 20).

Refugees are not treated equally, and there are different legal statuses and with differing access to rights and services among refugees in Iraq according to their nationality and country of origin. Palestinian refugees live in both camps and cities, and they have all of the same rights as Iraqi citizens. Palestinian refugees who arrived in 1948 and afterwards, have the right to work in both public and private sectors; but if they arrived in 1967 and afterwards, they are only allowed to work in the private sector (UNHCR, 2020). Palestinians have more comprehensive rights than other refugees. However, the majority of the refugees are Syrians (mainly Kurds), and they mainly live in the Kurdistan Region of Iraq (KRI). There are also Kurdish refugees from Turkey and Iran, Sudanese refugees and finally Al-Ahwazi refugees (Warda and Almajraji, 2020: 16). For all groups (except the Palestinians), a valid work permit provides the same rights as Iraqi nationals, as well as a minimum wage (UNHCR, 2020). In Iraq, there are also regional differences regarding labour market participation. For example, in the KRI, if a person entered the region without visa, he/she is permitted to work with a KRI residency permit for 15 years or more after obtaining a security clearance and health check; but if entering with a visa, employers must obtain work permit for that person from the Ministry of Labour and Social Affairs (ibid.)

Regarding labour market integration and the right to work, both refugees and asylum seekers have the right to work however, a work permit is required, which can be obtained from the Ministry of the Interior. Refugees must be at least 15 years old and hold a valid residence permit, which includes a mandatory blood test and security clearance (UNHCR, 2020).

In addition to the nationality and age criteria, the location within particular regions is also an important factor in terms of access to the labour market. According to the Residence Law of the KRI, asylum applicants have the right to work and enter the labour market when they obtain legal residency. Those who reside in the camps (38% of the total refugee population) can work freely in the camps, even if they do not obtain residency (Warda and Almajraji, 2020: 20)

Iraq is a federal state and it has a highly fragmented decentralized governance model, also visible in the protection and integration of refugees and asylum-seekers. According to the Political Refugees Law No. 51 of 1971, the Ministry of the Interior and, specifically, the Permanent Committee for Refugee Affairs of MoI (PCMOI), is the main responsible actor for the protection and integration of refugees (Warda and Almajraji, 2020: 14). The Ministry of Labour and Social Affairs (MOLSA) also has a specific role regarding the right to work and the labour market integration of refugees. The MOLSA has been working in close cooperation with both the UNHCR and the International Labour Organization (ILO) to communicate and analyse the needs of the market in order to find training opportunities for refugees and asylum seekers and to increase their chances of finding work (Ibid.: 22). In addition, national and local civil society organizations have been actively working in this field with the close cooperation with international organisations (IOs) and some of them are sub-contracted by those IOs to provide trainings and capacity building activities and improve the skills of refugees and asylum seekers (Ibid.).

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<sup>13</sup> Warda, W.K. and Almajraji, H.S. (2020, September 8). Integration Policies, Practices and Experiences – Iraq Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4019804>

In the KRI, the Kurdistan Regional Government (KRG) has not incorporated legal provisions into domestic legislation to regulate the refugee situation, despite the increased number of refugees. Therefore, the role of the United Nations High Commissioner for Refugees (UNHCR) is important. The UNHCR has a memorandum of understanding with Iraq, signed in October 2016 to enhance the protection of refugees and asylum seekers (Ibid.).

## **Main Trends**

In general, both the protection and integration policies regarding refugees can be characterized by instability due to changing approaches as well as regimes, even within the same government (Warda and Almajraji, 2020: 13). The country report emphasizes the negative impact of those changes on the integration of refugees in Iraq. In particular, the report highlights that refugees' integration has been used as a domestic policy tool within Iraq and also as a foreign policy tool against neighbouring countries (ibid.). The political instability of Iraq and internal conflicts, in particular between the federal government in Baghdad and the KRG, have had negative impacts on refugees.

### *Unemployment*

In terms of foreign-born unemployment, the country report does not provide information, but emphasizes that along with the refugee movement from Syria, the mass migration of internally displaced people to the Kurdistan Region in 2014 resulted in a 28% increase in the population of the region and brought on a severe financial crisis (Warda and Almajraji, 2020: 20). For the entire country, the unemployment rate was 12.82% in 2019 (STATISTA, 2020b).

## **Main Problems and Challenges**

- Refugees have difficulties finding jobs that match their skills (Warda and Almajraji, 2020: 23).
- The ongoing conflicts in the country result in employment problems, in particular leading to a decrease in job opportunities both for citizens and asylum seekers and refugees (Ibid.: 24).
- As is the case for the other RESPOND countries, language barriers appear to be one of the main obstacles for access to the labour market.
- The recognition of degrees and qualifications also appears to be an important problem, in particular for the formal market. Therefore, most of the jobs that are performed by asylum seekers and refugees are in the informal market and most of the positions do not align with refugees' educational background and training (Ibid.).
- In terms of labour market integration, refugees and asylum seekers have different chances to access the labour market. Refugees have more opportunities to integrate into the labour market than asylum seekers. Also, there are differences among the refugee groups based on their nationalities. For example, Palestinians can enter into the labour market more easily than those classified as asylum seekers. However, even when they are granted temporary renewable residency (because citizenship is prohibited for them), this permit only gives them the right to work for one year. (Ibid.: 22).
- Legal complexities and cumbersome bureaucratic procedures (e.g. security clearances and legal documents) affect refugees' ability to access employment (Ibid.).

## ITALY<sup>14</sup>

### Legal and Institutional Framework

The most important document is Legislative Decree No. 142/2015 and its Article 22, which foresees that asylum applicants can already start working 60 days after they have submitted an asylum application (Ibrido and Marchese, 2020: 24). This means that in Italy asylum seekers have the opportunity to work before they receive a decision on their application, in contrast to many other countries included in this report.

Article 25 of Legislative Decree No. 251/2007 clarifies that foreign nationals who have been granted refugee or subsidiary protection status are entitled to the same treatment provided to Italian nationals (Ibid.).

Although the National Plan for Integration of beneficiaries of international protection adopted in 2017 stresses the importance of recognition of their qualifications, the Italian legislation still requires migrants to go through complex and long procedures in order to obtain recognition of skills and qualifications acquired in their country of origin. (Ibid.: 27).

The two main public authorities responsible for the integration of refugees and asylum seekers into the labour market are the Public Employment Services (PES) and the System for the Protection of Asylum Seekers and Refugees (SPRAR) (Ibrido and Marchese, 2020: 24). In addition, the PES has administrative bodies that manage employment services at the local level (Ibid.). In addition, SPRAR offers a wide range of services that foster the integration of beneficiaries of international protection into the labour market (Ibid.). Through SPRAR, refugees and asylum seekers can be enrolled in specific professional training and internship programmes organised by institutions such as the voluntary sector, municipalities, etc.

Along with state actors, civil society also has an important role in the labour market integration of refugees. Civil society is actively engaged in labour market integration, and the efforts of such organisations complement those of the public authorities (Ibid.: 24). In this framework, the Territorial Councils for Immigration, which are organisations in the field of integration and reception are places where important stakeholders are represented, including representatives of employers' associations, trade unions and chambers of commerce (Ibid.: 29).

### Main Trends

The development of integration policies is something recent in the Italian legal policy framework. The country report explains that one of the reasons behind of this delay is the long tradition of being a country of emigration. Therefore, Italy has not been culturally well-equipped to face the challenges of a multicultural society. Additionally, due to its geographical position, it is more focused on efficient control of its borders. Thus, rather than promoting integration, it is more focused on preventing new arrivals. In addition, the increasing polarisation between pro-integration and anti-integration narratives, which were augmented by the recent economic crisis had a negative impact on integration policies (Ibrido and Marchese, 2020: 9).

#### *Unemployment*

Italy appears to be one of the few countries in which the employment rate of the foreign-born population (59.9%) is higher than that of native Italians (57.6%) (Ibrido and Marchese, 2020: 22). According to Figure 1, the unemployment rate of non-EU born is also lower than the unemployment of EU-born.

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<sup>14</sup> Ibrido, R. and Marchese, C. (2020, June 15). Integration Policies, Practices and Experiences– Italy Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3894103>



## Main Problems and Challenges

- For forced migrants, a lack of legal documents was identified as one of the main barriers to gaining access to the labour market. Without documents, it is not easy to find a job (Ibido and Marchese, 2020: 24).
- Recognition of skills and qualifications is problematic and has a negative impact on labour market integration. The lack of documents from the country of origin forces a large majority of refugees to seek informal jobs (Ibid.: 27).
- The long duration of the asylum application procedure is one of the barriers for access to the labour market (Ibid.: 24).
- There is a widespread problem of mis-qualification and/or overqualification that forces refugees to work at low-skilled jobs or at jobs for which they are over-qualified (Ibid., p. 22). The report also highlights the relationship between social discrimination and qualification mismatch (Ibid.: 24).
- Only a very limited number of foreign workers occupy top positions, for example as managers (0.8%) or executives (1.9%). The percentage of immigrants in low- or medium-skilled jobs is 86.5% (versus 60% of Italian citizens) (Ibid.).
- Considering geographical distribution, the largest number of non-EU employees and job seekers is concentrated in northwest Italy. Thus, there are spatial differences to employment opportunities (Ibid.).
- The main statistical indexes related to gender show a low employment rate for migrant women (Ibid.: 25). The number of economically active non-EU women appears especially low.
- Although, the specific figures are not known, “caporalato,” which refers to a form of labour exploitation through illegal recruitment practices, is very common in Italy (Ibid.: 28).

## POLAND<sup>15</sup>

### Legal and Institutional Framework

According to national law, refugees have similar rights regarding access to the labour market as Polish citizens with some exceptions (Sobczak-Szelc et al., 2020: 10). The employment of third-country nationals in Poland is regulated by the Law of 20 April 2004; however, it only applies to general foreign-born employees. Asylum seekers cannot work for the first six months from the date of submission of their application, but within this period they have the right to request a kind of temporary certificate (statement) that identifies the holder as a foreigner who is entitled to work within the territory of the Republic of Poland, according to the Law on the promotion of employment and labour market institutions (Law on Employment, Article 35(1)) (Ibid.). This certificate is valid until the final decision for protection, and if the asylum seeker decides not to appeal to the Refugee Board. For beneficiaries of international protection, a work permit is not required and their rights including the rights of their family members are equal to citizens of Poland (Ibid.). They can even access the public sector to the same extent as Polish citizens unless there is no specific limitation for the position to which they have applied. In comparison to asylum seekers, refugees/ beneficiaries of international protection can pursue economic activities and particularly self-employment (Law on Freedom of Economic Activity, Art. 13 (1))

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<sup>15</sup> Sobczak-Szelc, K., Pachocka, M., Pędziwiatr, K. and Szalańska, J. (2020, August 30). Integration Policies, Practices and Experiences – Poland Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4008666>

(Ibid.). Their rights are the same as Polish citizens in terms of job protection mechanisms, minimum wages and safe, healthy working conditions etc. (Ibid.: 39).

There are no regulations nor special programmes, additional incentives or benefits on the national level linking the placement of asylum seekers and beneficiaries of international protection with employment opportunities (Ibid.: 40).

Regarding validation of skills and recognition of qualifications and prior experience, the authorities verify whether a foreign educational document is recognized in Poland on the basis of international agreements. This is a costly and bureaucratic procedure and the existing legal and institutional framework does not provide additional resources for refugees (Ibid.: 41, 48).

The Ministry of the Interior and, in particular, the Administration Office for Foreigners, and the Ministry of the Family, Labour and Social Policy are the most important central state actors in the field of labour market integration (Sobczak-Szelc et al., 2020: 35). In addition, local level public administration actors, such as “poviats” (the largest cities), communes and family support centres, are responsible for implementation of Individual Integration Programs (IIP), and poviat labour offices are the most important state actors for the labour market integration of refugees (Ibid.: 43). Local government bodies seem to be most active in adopting different integration strategies, particularly in the big cities (Ibid.: 44).

### **Main Trends**

Starting from the 2000s, in particular by 2014 with the outbreak of armed conflict in Ukraine (Sobczak-Szelc et al., 2020: 20), the immigration and asylum field has been gaining importance. However, the report shows that the integration of foreigners is still not seen as a prioritized, major political or social problem in Poland. Due to the low number of foreigners and beneficiaries of international protection as well as asylum applicants, no comprehensive actions at the governmental level have been undertaken so far in the field of integration (Ibid.: 22). In terms of labour market integration, the country report highlights that the main goal of integration is to enable immigrants to live independently, allowing them to take advantage of the opportunities offered by the labour market. Thus, integration into the labour market is seen as important, but is not supported with the required legal and institutional framework.

The report emphasizes that there has been a shift towards a more security-oriented migration policy in Poland, focusing on knowledge-based migration-management systems to ensure security and public order. They are also thought to be more conducive to economic development and social cohesion (Ibid.: 23).

### *Unemployment*

The unemployment rates for refugees and asylum seekers are not available, because this is not accessible in Poland as is the case in many RESPOND countries. However, as can be seen in Figure 1, Eurostat 2020 data shows that the unemployment rate in Poland is under the average of the EU27 and the UK, which was 5.3 percent in 2019 (STATISTA, 2020d).

### **Main Problems and Challenges**

- The biggest problem is the lack of language skills and low social capital of refugees. In addition, available information regarding labour market access is also mainly in Polish (Sobczak-Szelc et al., 2020: 50).
- A major employment barrier is the low recognition of qualifications and diplomas of beneficiaries of international protection, due to the complicated and costly procedures. The Family Support Centres help their clients; however, the financial cost is not covered (Ibid.: 48).
- There is significant discrimination in the labour market (Ibid.: 62)

- There is a lack of mechanisms or a structured system of integration for immigrants and refugees, thus also for labour market integration (Ibid.)
- Asylum seekers have to wait at least for six months after their application to be able to access the labour market. In addition, this waiting period is also valid for their participation in entrepreneurship hubs, apprenticeships and traineeships.
- The report states that it takes 6 years for refugees to achieve a level of employment and income similar to that which they experienced in the country of origin and more than 15 years to reach the level of the native population (Sobczak-Szelc et al., 2020: 42). However, the report also states that they rarely perform the same jobs or jobs requiring similar qualifications in their country of origin.
- Beneficiaries of international protection are discouraged by the lack of possibility to take a better job in Poland and want to leave the country. They often try their chances abroad (Ibid.: 49).
- Another employment issue is the consciousness of employers. The legal system of employment of foreigners is perceived to be complicated, and employers are often confused about or unaware of whether or not they can employ a foreigner. There are limited trainings, information and support for employers regarding possibilities of employment of foreigners including refugees (Ibid.: 51).
- Women face many challenges when accessing the labour market, mostly due to social, cultural and traditional backgrounds in the country of origin (Ibid.).
- In order to access the labour market, one needs to have a specific number, which enables registration in the Social Insurance Institution (ZUS) or an Electronic Authorization Verification of the Beneficiary in the national insurance system; however, there are some administrative and technical problems that cause expulsions of people from these systems (Sobczak-Szelc et al., 2020: 37).
- Because of the existing systematic problems at the macro level in terms of labour market integration, but also due to other economic or social problems, such as discrimination of employers and exploitation of the foreign labour force as the cheap labourers, the beneficiaries of protection mainly work in the informal labour market in low paid jobs (Ibid.: 42).

## SWEDEN<sup>16</sup>

### Legal and Institutional Framework

In Sweden following the increasing number of refugees and also unemployment rates, in 2017, a new Government Bill was prepared focusing on responsibility for the integration of newcomers into society and the labour market. It offered new measures for the introduction of activities and programmes for certain newcomers (Cetrez et al., 2020: 18, 77). With this Bill, the existing fragmented legal framework, such as the Social Insurance Act, the Social Services Act, the Unemployment Insurance Act, the Act of Civic Orientation for Certain Newly were harmonised (Ibid.). In this way, the integration plan, in particular focusing on labour market participation, was replaced with a single labour market policy programme. This change started in the late 1990s, and through different migration waves Swedish integration policy centred its main priority on the labour market integration of newcomers. Consequently, the Swedish Employment Office has

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<sup>16</sup> Cetrez, O., DeMarinis, V., Pettersson, J. and Shakra, M. (2020, July 19). Integration Policies, Practices and Experiences – Sweden Country Report (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3951714>



become one of the key actors in shaping and coordinating integration policies. In 2018, an education and job training programme has become obligatory for newcomers.

Regarding access to labour market, asylum seekers are exempt from the requirement to have a work permit; however, if their application is rejected, they will not be able to work (AIDA, 2020b). Thus, until a final decision is taken, asylum seekers can work, and if their application is accepted, they can continue. Asylum seekers cannot work in areas that require certified skills such as in the health care sector, so their choice is limited in practice to the unskilled sector (Ibid.). It is also possible to change their legal status from that of an asylum seeker to that of a labour migrant, if he or she can manage to work for 4 months before the decision to reject their asylum application has been taken and if their employer offers a 1-year contract or longer (the application should be done in 2 weeks from the asylum rejection date) (Ibid.; Cetrez et al., 2020: 22). Finally, refugees with work experience are quickly moved into similar jobs in Sweden and can even be part of a fast-track procedure in order to speed-up integration into the labour market. This implementation is valid since 2017 for social scientists, social workers, teachers, health-care workers, construction workers, wood workers, etc. (Ibid.)

Initially, in 1969, the State Immigration Agency was established as responsible for the integration dimension (Cetrez et al., 2020: 17). The country report highlights that since the beginning, integration has always been approached with a special focus on the labour market. For example, the Ministry of Integration and Gender Equality was introduced in 2007 with a special strategy to support the demand for labour and supply. In 2014, the governance of newcomers' integration was moved to the Ministry of Labour, and rather than a Ministry of Integration, integration was transferred to the Public Employment Office further displaying the importance of labour market integration (Ibid.: 18). Recently, the Swedish Public Employment Service (PES) has become the main actor responsible for integration with the responsibility of ensuring quick and efficient integration into the labour market (Ibid.: 19). In addition, the municipalities have a responsibility for integration and for social services and economic support for people who have no other means of support (Ibid.). Also, the Swedish government adopted a policy in 2010 aimed at engaging civil society organisations and providing some financial incentives for activities that promote language learning and labour market integration (Ibid.: 20). The country report states that civil society is effective in bridging the gap between public authorities and asylum seekers and refugees, and facilitates their integration into the labour market (Ibid.: 25).

The County Administrative Boards play a central role and share the responsibility of reception and integration into labour markets, along with the Swedish Migration Agency, the Public Employment Service and the municipalities. The County Administrative Boards provide financial compensation to the municipalities (Ibid.: 23).

## **Main Trends**

In 1975, the policy of multiculturalism was adopted as an important shift for integration policy (Barthoma 2020 cited in Cetrez et al., 2020: 17). Starting from the 1980's, the refugee dimension became visible within the policies, and refugees were accepted from the Former Yugoslavia. However, starting from 2016, the country abandoned its generous approach, and more strict policies were adopted due to increasing numbers of asylum seekers (Ibid.). Despite the multiculturalism and reception focus, due to the higher unemployment rate of the new comers and the changing profile of immigration (from labour migrants to forced migrants), the integration responsibility was transferred from municipalities to the more centralized PES (Ibid.).

Briefly, it can be said that the recent main trend of Swedish integration policy is "to allow new arrivals to establish themselves, by providing services and facilitating access to work that will allow them to support themselves and their family" (Ibid.: 21). Thus, the main focus is labour

market integration due to the high unemployment rates and also the demands of a high-skilled labour market, leading to a direct focus on adult education and skills training (Ibid.)

### *Unemployment*

The current unemployment rate is at 6,9%, just above the EU average (Ibid.: 21) and in 2019 the unemployment rate of foreign-born residents in Sweden was 15,4 %, compared to 3,8% for Swedish-born residents (SCB, 2019 cited in Cetrez et al.: 21).

Labour market integration, access to secondary education, language training and vocational support appears to be an important factor, and due to language requirements and the general labour market situation, Sweden has a relatively high youth unemployment and a general unemployment rate of 6,8% in 2019. (AIDA, 2020b).

The employment rates of female and male refugees were close to equal in Sweden in 2018, with 66.9% of the female refugees and 68.7% of male refugees being employed (STATISTA, 2020e). The unemployment rate among foreign-born men fell from 21% to 18.5%, compared to 19.6% of women (down from 20.8%), but there is still a big gap between foreign-born and native Swedes (The Local, 2020).

### **Main Problems and Challenges**

- The lack of communication between multiple levels of government and a failure to coordinate language learning and job-training in accordance with individual skills is a major barrier to employment.
- The issue of exploitation of free labour also affects newcomers, as they are often hired as interns but not hired later on for more permanent positions (Cetrez et al., 2020: 25).
- Lack of language ability and lack of information are important barriers to employment, as well as the nature and type of work offered (Ibid.: 27).
- Labour market integration was found to be most challenging for low-skilled people since the demand of the market is mainly for a medium and high-skilled workforce. Thus, there is an increasing rate of unemployment among the lower-skilled and particularly among young people (Ibid.: 22).
- Discrimination seems to be a major obstacle, preventing newcomers from obtaining a permanent job.
- Newly arrived migrants (in particular from outside Europe) may face difficulties entering the Swedish labour market due to a lack of adequate qualifications and skills and low educational attainment.

## **TURKEY<sup>17</sup>**

### **Legal and Institutional Framework**

Integration is a new policy field that has been recently taking shape in the Turkish legal and political context. The Law on Foreigners and International Protection (LFIP/2013) and the Temporary Protection Regulation (TPR/2014) determine migrants' legal status and have provisions for the labour market (Rottmann, 2020: 18).

The majority of the refugees in Turkey are Syrians under the temporary protection and the specific regulation governing their labour market participation is the Regulation on Work Permits of Foreigners under Temporary Protection (2016). As Syrians are the only group under temporary protection status, this regulation only targets them and ensures that their rights are

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<sup>17</sup> Rottmann, S.B.. (2020, May 30). Integration Policies, Practices and Experiences – Turkey Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3865824>

protected from exploitation and that they receive at least a minimum wage (Ibid.: 32). The employer needs to apply for a work permit on behalf of the Syrian employee [Article 5(2)] as also justifying that no Turkish citizen can fulfil this job (Article 8(3)), and the number of Syrians under temporary protection cannot exceed 10 percent of the total workforce [Article 8(1)] (Çetin et al., 2018). Apart from temporary protection, there are also other labour laws governing international protection and/or migration in general, including secondary laws, such as the Regulation on the Labour of Applicants and Beneficiaries of International Protection. This Regulation provides the right to work for beneficiaries of refugee status and subsidiary protection status without having to apply for a work permit provided that their international protection identification documents can be substituted for a work permit.

Turkey's legal framework grants access to the labour market and the right to work to the beneficiaries of international and temporary protection; however, they should be employed with a work permit delivered by the Ministry of Family, Labour and Social Services (Ibid.). The work permit application needs to be done by the employer on behalf of refugees and there are some limitations, because the employer should demonstrate that he/she could not find a Turkish citizen to fulfil this job. Also, the expenses for the work permit should be covered by the employer. In particular regarding temporary protection, the workforce of the beneficiaries can only constitute 10%, to protect Turkish citizens. This rule is valid for all foreigners including the refugees and conditional refugees (non-European). Upon receiving a refugee status or subsidiary protection as well as temporary protection status, applicants must wait for 6 months to apply for a work permit in Turkey. The work permit's approval takes at least 2 months. Thus, there is at least an 8 months-time restriction for international and temporary protection beneficiaries. Both the asylum process as well as the work permit process are highly time consuming and serve to limit access to the labour market and to slow down labour integration, which results in employment in the informal market and a high risk of exploitation. Although migrants may receive financial assistance in the form of cash payments, there are specific criteria that must be met, which includes not having worker with social insurance in the household. Thus, in practice there are some conflicting regulations that create employment barriers.

Although Turkey does not have an official, national integration policy or programme for refugees, *de facto* integration policy programmes are observable with the cooperation of many actors that promote integration (*uyum*) (Rottmann, 2020: 23). According to the LFIP law, the Directorate General of Migration Management has a special section working on the integration of migrants (Ibid.: 23). In addition, the ministries and government bodies, such as the Ministry of Family, Labour and Social Services have direct responsibilities regarding the labour integration of international and temporary protection beneficiaries. Another key integration actor are local municipalities, but "their service provision is very uneven due to uncertainty as to whether or not municipalities are allowed to provide services to noncitizens" (Ibid.: 24). IOs, IGOs and I/NGOs are also major integration actors, both because of their direct social cohesion programmes and also because they provide translation services and run programmes related to formal integration measures, such as vocational training and language training in relation to labour market integration (Ibid.: 24). Integration is also supported by the local communities and these networks carry the utmost importance for accessing the labour market.

## Main Trends

Turkey does not grant refugee status to non-European refugees due to Turkey's geographical limitation to the 1951 Geneva Convention, but "conditional-refugee" status pending resettlement and a durable solution provided by UNHCR is granted, (Çetin et al, 2020). This situation results in limitations to protection under international law, a dual international protection regime as well as reduced access to rights (Gökalp-Aras and Şahin-Mencütek, 2020). In addition to the above-mentioned international protection, Syrians are provided temporary protection, which brings

additional complexities and uncertainties for asylum policy and IP. A dual protection regime and a dominance of temporary mechanisms characterize the national protection regime. Consequently, “the gap between legislations and actual practices are observable, generating high level of precarity and fragility for asylum seekers and holders of international/temporary protection statuses” (Kaya et. al., 2020).

In general, the main trends in Turkey are transition from an open-door policy to a closed-door policy and a focus on return policy rather than reception and integration. Starting from 2018, the return discourse became visibly dominant particularly for Syrians. In this framework, “the demarcation between reception and integration is not clear cut, because there is no legal differentiation between reception and integration (Rottmann, 2020: 13). The majority of forced migrants in Turkey are not able to become refugees and by extension are not officially asylum seekers due the previously explained dual structure of the protection regime in Turkey. Although the state’s charity and hospitality discourses are welcoming of migrants, there is no long-term permanent integration discourse (Ibid.: 20). Rottmann defines the main trend regarding integration as “over before it started” (Ibid.).

### *Unemployment*

In 2018, the economy in Turkey grew by only 2.6%. With more than 700,000 people entering the labour market annually, the unemployment rate soared to 13.7% in March (Kirisci and Kolasin, 2019). In 2019, the unemployment rate in Turkey was at about 13.49% (STATISTA, 2020f). For 2018, the Directorate General for Migration Management’s (DGMM) official figures list 16,783 work permits for Syrians (Rottmann, 2020: 32). This number was just 65,000 at the end of 2019, according to news reports (Ibid.).

### **Main Problems and Challenges**

- Rather than integration and durable solutions, there is a significant emphasis on “temporality” and “return”, which hamper all integration process, including labour market integration (Rottmann, 202: 19).
- Recognition of qualifications are problematic with educational backgrounds tending to be under-valued (Ibid.: 10).
- Language barriers, delays in registration, and employers’ reluctance to employ refugees leads to migrants entering the informal labour market in large numbers.
- Tensions between migrants and members of local communities are extremely high in particular during economic crisis periods, which creates a negative impact on labour market integration (Ibid.: 20).
- Due to long and complex bureaucracies and the major responsibility of employers, there is high rate of employment within the informal market.
- The criteria of existing social aid programmes’ hamper migrants from obtaining social security, because the precondition of these programmes is not having someone as working with social security within the household.

## UNITED KINGDOM<sup>18</sup>

### Legal & Institutional Framework

Access to the labour market is determined by the legal status of the people involved. While asylum seekers face restrictions in accessing the right to work, refugees and subsidiary protection beneficiaries have access to the labour market in the UK. In contrast to refugees and beneficiaries of international protection, asylum seekers need to apply for a permission to work (from the Home Office) (Atto et al., 2020: 23). However, even though this access is provided, it is limited to the jobs on the shortage list (Ibid.). Migrants can work as volunteers without any limitations. The UK complied with the 2003 European Directive on Reception Conditions for asylum seekers in terms of labour market access, but not the 2013 recast Directive. The 2003 Directive mandated that the maximum waiting time for permission to work was 12 months; the UK adjusted its immigration rules in 2005 accordingly (Gower, 2016: 5 in Atto et al. 2020). Thus, while asylum seekers have 12 month waiting period, refugees and beneficiaries of humanitarian protection do not have to meet this time limitation in order to access the labour market. Those who are eligible to work can apply to the Department of Work and Pensions and be considered a member of a priority group (Ibid.). The Refugee Integration and Employment Service also provides support for employment to refugees for 12 months (Ibid.: 24).

For recognition of qualifications, the UK's National Academic Recognition Information Centre (NARIC) provides services, but these are not free of charge. There are also other agencies with specific responsibilities for refuge accreditation and equivalence recognition, but the support of the related actors is limited (Ibid.: 25). Therefore, there are numerous challenges to getting documented qualifications, which is a widespread problem for refugees.

In terms of vocational training and the acquisition of work skills, individuals who have arrived in the UK as resettled refugees have the same entitlements as British citizens; but despite their formally recognized rights, the country report states that there are significant financial barriers (Ibid.).

In terms of vulnerabilities, Atto et. al (2020) state that refugee employment also has a gendered dimension. The authors highlight the employment of 34.5% of female 'asylum migrants' compared to 63.6% of asylum migrant men for the 2010-2017 period (Ibid.: 26). They also state that refugee women face specific challenges in entering the workforce due to a lack of affordable childcare, a lack of specialised services for refugee women, discrimination and a lack of previous formal work experience etc. (Ibid.).

Regarding the informal labour market, although refugees are entitled to work, due to some common obstacles, such as lack of language skills, problems regarding recognition of qualifications and a lack of employer's knowledge about refugee rights, for many, the formal sector is inaccessible. In the informal sector, refugees take up low-skilled and poorly paid jobs, including cleaning, painting, care and retail (Ibid.: 27).

Both the existing policies and also the actors within the governance of integration appear quite fragmented vertically between levels of government (across the UK's three tiers of Government), horizontally across different departments and at delivery in terms of different approaches for different categories of migrants (Atto et al., 2020: 15).

There is no UK-wide policy and institutional framework for integration (Atto et al. 2020). The Home Office is the primary actor dealing with immigration and has limited responsibility for and focus on immigrant integration. But in general, due to the Localism Act of 2011, the UK

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<sup>18</sup> Atto, N., Hirst, C. and Hall, V. (2020, July 14). Integration Policies, Practices and Experiences – United Kingdom Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3945509>



encourages local authorities and devolved administrations to determine their own priorities, including in the field of integration. Therefore, municipalities appear to be important actors (Ibid.: 20). The Ministry of Housing, Communities and Local Government (MHCLG) and civil society organizations have key responsibilities, including empowerment through employment (Ibid.).

Specifically, for labour market integration the UK-wide body charged with supporting all eligible jobseekers, including refugees and subsidiary protection beneficiaries is Jobcentre Plus, which is part of the Department for Work and Pensions (Ibid.: 23). In addition, the Refugee Integration and Employment Service (RIES) provided housing, education, welfare and employment support to refugees for 12 months between 2008-2011 (Ibid.: 24)

## **Main Trends**

Atto et al. (2020: 8), state that the UK's approach to immigrant integration has been developed in reaction to major events, thus can be said to be "reactive". Since 2000, due to increasing anxiety about religious fundamentalism and integration, a general securitisation approach is visible in many policy areas, including migration and integration. This has led to a shift from multicultural integration policies to policies centred on the securitization of migration. In addition, there has recently been a recent shift of responsibility from the centre to the local authorities and to the immigrants themselves (Ibid.). The report determines that the general trend of integration in the UK can be called "non-interventionist," which results in a series of fragmented realities in policy and practice.

### *Unemployment*

In terms of unemployment, the UK country report states that at the national level, employment rates of foreign-born people are available but not specified in terms of refugee or asylum seeker status. The report states that the 2005-2009 Survey of New Refugees shows that after eight months of having refugee status, 34% of surveyed refugees were employed, which increased to 49% after 21 months (All Party Parliamentary Group on Refugees, 2017 and Home Office, 2010 cited in Atto et al., 2020: 22). Another study shows that between 2010 and 2017, the employment rate of asylum migrants was 51%, compared to an employment rate of 73% for those who are British-born (Zovanga et. al., 2019 cited in Atto et al., 2020: 22). In terms of unemployment, 18% of asylum migrants were unemployed between 2010 and 2017, which is triple the unemployment rate of the British-born population (Ibid.).

## **Main Problems and Challenges**

- Language-learning problems have clearly been identified as one of the most influential and fundamental barriers towards integration into the UK labour market and the ability to work (Ibid.: 9, 34).
- The consequences of discriminatory practices towards newcomers in the labour market are also reported in the country report as systematic problems (Ibid.).
- The working ban for asylum seekers in their initial period has detrimental consequences on their wellbeing and further integration into society (Ibid.). UK governmental policy differences regarding asylum seekers and refugee-status migrants is determined as being one of the biggest systematic problems to obtaining work in the formal labour market as access to work is determined by legal status (Ibid.: 35). At the systemic policy level, asylum seekers are denied the right to work, which limits their ability to work until they receive a positive result on their asylum application (Ibid.: 39). Even the acquired refugee status does not guarantee access to the labour market due to direct and indirect discrimination practices towards newcomers (Ibid.).
- Long waiting periods have been attributed to deficiencies in structural organisation

and government policy. Although job centres have been providing services in this field, eligibility to register with job centres are among the most frequently cited problems (Ibid.: 37).

- There is a discrepancy between formal rights and entitlements and de facto access to the labour market. Although some rights are provided within the legal framework, in practice they are not accessible, due to a lack of UK work experience. The report states that UK Government policy in the field of labour market integration and services provided by job centres does not respond to the needs of refugees. Systemic barriers exist, and many facilities are not accessible to the target group (Ibid.)

## 2.2. Summative Table – Labour Market Integration

	Governance model	Main actors	Unemployment rate of refugees vis-à-vis general figures	Main Trends in Integration Policy and Labour Market	Main problems expressed
<b>Austria</b>	Hybrid due to the Federal System	<ul style="list-style-type: none"> <li>Federal Office for Immigration and Asylum</li> <li>The Federal Ministry of Labour, Social Affairs and Consumer Protection</li> <li>The special Secretariat for Integration (since 2015 part of the Ministry of Foreign Affairs)</li> <li>Public Employment Service</li> </ul>	<ul style="list-style-type: none"> <li>Total unemployment rate 7.7%</li> <li>40.7% for the three main refugee groups (Afghans, Syrians and Iraqis)</li> </ul>	<ul style="list-style-type: none"> <li>Restrictions on access to the labour market for asylum seekers until refugee or subsidiary status is given.</li> <li>Civic integration approach.</li> <li>Securitisation (in particular Islam is seen as a cultural threat)</li> </ul>	<ul style="list-style-type: none"> <li>Asylum seekers' face restricted access to the labour market.</li> <li>Long-lasting asylum procedures are responsible for the long absence of refugees from the labour market.</li> <li>Poor language proficiency is one of the major barriers to labour market access, which is also used as an alleged excuse to cover other discrimination.</li> <li>Problems regarding recognition of qualifications.</li> <li>In particular, wearing a headscarf is detrimental for women regarding access to the labour market.</li> <li>Regional differences in labour market opportunities.</li> </ul>
<b>Germany</b>	Hybrid due to the Federal System	<ul style="list-style-type: none"> <li>The Federal Office for Migration and Refugees</li> <li>The Ministry of Economic Affairs</li> <li>The Ministry of Labour and Social Affairs</li> <li>The Ministry of Economic Cooperation and Development</li> <li>IOs, INGOs and NGOs (multi-level governance due to the federal system)</li> </ul>	<ul style="list-style-type: none"> <li>Total unemployment rate 7.13% (2020).</li> <li>Unemployment rate of foreign-born: 14.4% (2020)</li> </ul>	<ul style="list-style-type: none"> <li>Due to the long-history of a guest worker tradition, mainly ad-hoc responses and temporality-based policy.</li> <li>Seeing integration as a "social problem"</li> <li>"Structural" and "socio-cultural" approaches for integration.</li> <li>Approaching refugees according to their economic value and emphasizing the "usefulness" of asylum seekers.</li> </ul>	<ul style="list-style-type: none"> <li>Considerable mismatch between the level of employment in the countries of origin and in Germany.</li> <li>Refugees find jobs below the level of their previous employment in the country of origin.</li> <li>Language barriers exist, despite many training measures and integration courses.</li> <li>Gender bias and higher unemployment rates can be observed for women mainly due to gender inequalities in terms of care and family childcare duties.</li> </ul>
<b>Greece</b>	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>The Ministry of the Interior</li> <li>The Ministry of Migration Policy</li> <li>The Ministry of Labour and Social Affairs</li> <li>The Directorate for Social Inclusion</li> <li>The National Committee for the Social Integration</li> <li>The Local Governments through the Municipalities</li> <li>IOs, (I)NGOs</li> </ul>	<ul style="list-style-type: none"> <li>Unemployment rate of foreign nationals (2008-2016) was 24.26%, which was higher than the 23.61% total unemployment.</li> <li>This rate dropped from 19.1% in July 2018 to 16.9% in July 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The EU is an important external actor in the determination of integration policies.</li> <li>Refugee integration in Greece is underdeveloped, including labour market integration.</li> </ul>	<ul style="list-style-type: none"> <li>6-month time restrictions and the requirement of completing full registration in terms of asylum application leads to employment delay.</li> <li>Lack of information, lack of required documentation (e.g. residency permits, passport) and language barriers.</li> <li>Employers willing to recruit asylum seekers are discouraged from doing so, in order not to risk penalties.</li> <li>Problems in practice for participation in vocational trainings.</li> <li>Asylum seekers have significant obstacles to opening bank accounts, which is a requirement for employment.</li> </ul>
<b>Iraq</b>	Fragmented, regional differences between the Central state of Iraq and	<ul style="list-style-type: none"> <li>Ministry of Interior</li> <li>The Permanent Committee for Refugee Affairs of Mol</li> <li>The Ministry of Labour and Social Affairs</li> </ul>	<ul style="list-style-type: none"> <li>For the entire country, it was 12.82 % in 2019.</li> </ul>	<ul style="list-style-type: none"> <li>There is no national-level integration strategy.</li> <li>Internal conflicts, in particular between the federal government in Baghdad and the KRG have negative impacts on refugees.</li> </ul>	<ul style="list-style-type: none"> <li>Refugees have difficulties finding jobs that match their competences and qualifications.</li> <li>The ongoing conflicts in the country result in employment problems, in particular in a decrease in job opportunities</li> <li>Language barrier appear to be one of the main obstacles for access to the labour market.</li> </ul>



	Kurdistan Region of Iraq (KRI)	<ul style="list-style-type: none"> <li>• The Kurdistan Regional Government (KRG)</li> <li>• UNHCR, ILO and the other related IOs, (I)NGOs.</li> </ul>		<ul style="list-style-type: none"> <li>• It is highly fragmented and there are national and legal status-based differences among the refugees in terms of accessing the labour market and the right to work.</li> </ul>	<ul style="list-style-type: none"> <li>• The lack of recognition of degrees and qualifications negatively impacts access to the formal market.</li> <li>• Most of the jobs that are performed by asylum seekers and refugees are in the informal market.</li> <li>• Refugees and asylum seekers have differential chances for access to the labour market based on their nationalities.</li> <li>• Legal complexities affect refugees' ability to access work due to the various security clearances and legal documents needed to apply for many positions.</li> </ul>
Italy	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>• Ministry of the Interior</li> <li>• The Public Employment Services (PES)</li> <li>• The System for the Protection of Asylum Seekers and Refugees (SPRAR)</li> <li>• Municipalities</li> <li>• IOs, (I)NGOs, IGOs</li> </ul>	<ul style="list-style-type: none"> <li>• The employment rate of foreign born (59.9%) is higher than that of native Italians (57.6%)</li> <li>• The employment rate of foreigners living in Italy stood at 58.4% in 2020.</li> </ul>	<ul style="list-style-type: none"> <li>• Due to its long emigration history, Italy has been relatively late in developing integration policies.</li> <li>• Due to its geographical position, rather than promoting integration, the country is more focused on containing new arrivals through border controls.</li> <li>• The increasing polarisation between pro-integration and anti-integration narratives was affected by the recent economic crisis and has had a negative impact on integration policies.</li> </ul>	<ul style="list-style-type: none"> <li>• The recognition of skills and qualifications is problematic and has a negative impact on labour market integration.</li> <li>• The long duration of the asylum application procedure is the main barrier for access to the labour market.</li> <li>• The widespread problem of mis-qualification and/or overqualification leads to refugees working at low-skilled jobs for which they are over-qualified.</li> <li>• Spatial differences in employment opportunities can be found.</li> <li>• Labour exploitation through illegal recruitment practices is observable.</li> </ul>
Poland	Hybrid, fragmented	<ul style="list-style-type: none"> <li>• The Ministry of the Interior</li> <li>• The Ministry of the Family, Labour and Social Policy</li> <li>• The local level public administration actors</li> <li>• The Family Support Centres</li> <li>• Local government bodies</li> <li>• IOs, IGOs (in particular the EU), (I)NGOS</li> </ul>	<ul style="list-style-type: none"> <li>• The unemployment rate of non-EU citizens born in Poland is under the average of the EU27 and the UK, which was 5.3% in 2019.</li> </ul>	<ul style="list-style-type: none"> <li>• Integration of foreigners is still not seen as a major political or social problem due to the low numbers of migrants</li> <li>• There are no comprehensive actions regarding integration policy</li> <li>• Recently, Poland has become more security-oriented, anti-immigration and anti-refugee. These narratives gained importance after the victory of right-wing, conservative and populist parties.</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of language skills and low social capital of refugees, which means inability to access information about labour market access, which is mainly in Polish.</li> <li>• Low recognition of qualifications and the diplomas of beneficiaries of international protection due to complicated and costly procedures.</li> <li>• Discrimination in the labour market.</li> <li>• It takes a long time to achieve a level of employment and income similar to those migrating out of the country.</li> <li>• The legal system covering employment of foreigners is perceived to be complicated for employers, and there are limited trainings for employers regarding the possibilities of employment of foreigners.</li> <li>• Discrimination by employers, exploitation of the foreign labour force and thus a high level of employment in the informal market with low paid jobs is observable.</li> </ul>
Sweden	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>• Sweden Migration Agency</li> <li>• Swedish Public Employment Service</li> <li>• Municipalities</li> <li>• The County Administrative Boards</li> <li>• Civil society</li> </ul>	<ul style="list-style-type: none"> <li>• The unemployment rate of foreign-born residents in Sweden was 15,4 %, compared to 3,8 % for Swedish-born residents.</li> </ul>	<ul style="list-style-type: none"> <li>• Starting from 2016, after an increase in asylum seeker numbers,</li> <li>• the country left its generous approach and adopted more strict policies</li> <li>• Responsibility was transferred from municipalities to the more centralized Swedish Public Employment Service</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of communication between multiple levels of government is observable.</li> <li>• Exploitation of the free labour of newcomers as interns who are then not hired for more permanent positions is common</li> <li>• Lack of language and lack of information is an issue.</li> <li>• Labour market integration is the most challenging topic for low-skilled people since the demand of the market is mainly for a medium and high-skilled workforce.</li> <li>• Discrimination seems to be a major obstacle, preventing newcomers from obtaining a permanent job.</li> </ul>

Turkey	Neoliberal governance (for the labour market) but also centralist approach	<ul style="list-style-type: none"> <li>Ministry of the Interior, Directorate General of Migration Management and Its special department on Integration</li> <li>Municipalities</li> <li>Ministry of Family, Labour and Social Services</li> <li>IGOs, IOS, (I)NGOS, local communities</li> </ul>	<ul style="list-style-type: none"> <li>Foreign-born unemployment in Turkey appears to be 12.9 %but the unemployment rate is not available for beneficiaries of international and temporary protection.</li> </ul>	<ul style="list-style-type: none"> <li>Access to the labour market is based on legal statuses, and Turkey has a complex protection structure with refugee, conditional refugee and international and temporary protection divisions.</li> <li>The recently prominent return narrative hampers integration policy. Temporary versus durable solutions and integration policies are observable.</li> </ul>	<ul style="list-style-type: none"> <li>Rather than integration and durable solutions, there is a significant emphasis on “temporality” and “return”.</li> <li>Recognition of qualifications is problematic.</li> <li>There is a lack of language skills among migrants.</li> <li>Tensions between migrants and members of local communities are present.</li> <li>Due to the complex bureaucracy and the major responsibility placed on employer to secure a work permit, there is a high rate of employment within the informal market.</li> <li>Existing social aid programmes’ criteria hamper migrants from obtaining work with social security, because the precondition of the programmes is not having someone working with social security living in the household.</li> </ul>
UK	Fragmented between levels of government (horizontal) and within levels of government (vertical)	<ul style="list-style-type: none"> <li>The Home Office</li> <li>Jobcentre Plus which is part of the Department for Work</li> <li>The Refugee Integration and Employment Service</li> </ul>	<ul style="list-style-type: none"> <li>18% of asylum migrants were unemployed between 2010 and 2017, which is triple the unemployment rate of the British-born population (Ibid.).</li> </ul>	<ul style="list-style-type: none"> <li>Since 2000, due to increasing anxiety about religious fundamentalism and integration, a general securitisation approach is visible</li> <li>A shift from multicultural integration policies to securitization policies is observable</li> <li>A shift of responsibility from the centre to the local authorities and to the immigrants themselves is clear.</li> </ul>	<ul style="list-style-type: none"> <li>Language-learning problems exist for migrants.</li> <li>There are discriminatory practices towards newcomers in the labour market.</li> <li>The working ban for asylum seekers in their initial period has detrimental consequences on their wellbeing and further integration into society.</li> <li>Long waiting periods have been attributed to deficiencies in structural organisation and government policy.</li> <li>There is a discrepancy between formal rights and entitlements and de facto access to the labour market.</li> </ul>

### 3. Education Policies and Integration

This section explores the legal and policy framework, the main actors involved, the main trends and the major obstacles and challenges in terms of education policies and integration of asylum seekers and refugees (including their children and unaccompanied minors) in the studied countries<sup>19</sup>. It also looks at the availability, accessibility, acceptability as well as adaptability of language acquisition and educational opportunities for them. This section focuses on both formal and informal educational opportunities provided to asylum seekers and refugees and the differences found due to their distinct legal statuses.

Education provides refugees with intellectual opportunities to shape the future of their own countries or to make a positive contribution to the host countries that give them shelter, protection and hope for the future (UNHCR, 2016c). Education can provide long-term, reliable and safe environments, especially for some of the most vulnerable refugee populations (UNHCR, 2015). In recent years, anti-immigration / anti-refugee sentiments in society have been strengthened, which has also contributed to a shift in policies and education curricula in some countries. For children and teenagers, the right to school guarantees education irrespective of their migration background or the legal status of their parents. However, linguistic and social barriers still hinder students with a migration background from achieving the same objectives as native students. Although the number of schools for refugee children has increased in several countries, the classroom situation is strained due to overcrowded classes, insufficient funding and lack of resources and trained staff. There is a lack of systematic evaluation of the abilities and learning needs of students before they are assigned to schools. We have observed that access to education is primarily linked to the legal status of individuals, whereby those classified as 'refugees' have comparatively better opportunities to access educational resources than those classified as 'asylum seekers'. A certain determination to learn the language of the host country can be observed among the majority of asylum seekers and refugees, irrespective of the country in which they reside. However, for many asylum seekers and refugees, employment is far more essential and a more urgent necessity than language learning. The opportunity to meet and interact with the wider community greatly helps asylum seekers and refugees to learn the language of the host country and, conversely, impedes their language learning process.

While central governments provide the policies and structure for the education of asylum seekers and refugees in most cases, regional and local authorities play a significant role in implementing policies. The activities of NGOs and CSOs in terms of facilitating language learning and informal educational opportunities as well as promoting and preserving social cohesion are remarkable. However, in some cases, their collaboration with local and central governments turns out to be a complex issue. In some countries, faith-based NGOs play an important role as an actor in the education sector contributing in informal education. Friends and family, community networks, refugees themselves (i.e. Refugees acting as teachers-Syrian refugees in camp schools in Iraq) are notable actors in terms of education and integration.

Although there is a strong framework to guarantee the right to education of refugees, the barriers and challenges which exist in this context may prevent desired outcomes drastically (UNESDOC, 2017). The language barrier is the most crucial challenge for asylum seekers and refugees in the context of language acquisition and educational opportunities. The place of residence of asylum seekers and refugees is often located in remote areas, which in itself constitutes a major obstacle to education and integration. Throughout the different country reports we have seen a trend of placing refugees in the same language classes regardless of their considerable age

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<sup>19</sup> Based on the macro section of RESPOND integration country reports: Austria, Greece, Germany, Italy, Iraq, Poland, Sweden, Turkey, and the UK.

gaps and levels of education. Although the number of schools for refugee children has increased in several countries, the classroom situation is strained due to overcrowded classes. Teachers and volunteers are often not well-equipped to teach their lessons in such classes. Moreover, there is a lack of organized childcare during language lessons for adults, which makes it difficult for women with children to take part in such lessons. The circumstance of lack of access to language courses for refugees with special needs is particularly problematic for the elderly who struggle more to learn the language. In the cases where refugees have access to universities, the lack of documentation verifying their academic qualifications/degrees earned in the country of origin often preclude them from actually studying at a university. In addition, lack of information on their rights and confusion about the organization of courses are adversely affecting their educational opportunities and the language acquisition of asylum seekers and refugees.

### 3.1. Country Cases

#### AUSTRIA<sup>20</sup>

##### Legal and Institutional Framework

The education of asylum seekers and refugees in Austria is divided into two major categories: language acquisition and civic integration programs for adults and school education for children and teenagers. Adult education centres on their integration into the Austrian society. This need for adult integration falls under the National Action Plan of 2010. This Plan stipulates that successful integration is achieved if the individual has gained sufficient German language proficiency for employment or economic self-sustainability, and contact with public institutions, and if there is comprehension of Austrian and European law and values. Spearheading this plan is the Austrian Integration Fund (ÖIF) as a central organization responsible for the implementation of civic integration programmes. It offers funding for course providers who adopt its curricula, consisting of lessons on values and orientation knowledge in addition to German classes. The funded projects include final exams that verify whether the desired language level has been reached. German courses and final exams are free of charge for participants. However, the levels A2 and B1 are only subsidized for persons who do not receive any social aid. These integration measures primarily target recognized refugees.

The integration policies for asylum seekers and people granted international protection falls under the Integration Act of 2017. After signing an integration declaration, there is a compulsory attendance and participation in language courses as well as value and orientation courses as developed within the framework of the 50-Point Plan for Integration (2015). The main topics of the courses concern the basic values of the Austrian constitution, such as equal rights for men and women, human rights, the separation of religion and state, democracy, freedom of expression, and the rule of law. At the national level, this service of language and integration course is provided for only beneficiaries of international protection. Asylum seekers on the other hand depend on provincial support structures.

For children and teenagers, the Federal Constitutional Law mandates a right to school, which guarantees education irrespective of their migration background or the legal status or citizenship of their parents. Compulsory schooling begins on September 1st after a child has turned six years old and lasts for nine years. Teenagers can attend a secondary school, complete an apprenticeship, or do some other kind of training (e.g. an internship). However, asylum seekers

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<sup>20</sup> Josipovic, I. and Reeger, U. (2020, June 17). Integration Policies, Practices and Experiences – Austria Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3898430>

are explicitly excluded from this obligation that would guarantee access to diverse educational and employment institutions.

The 2018 amendments to the *Schulorganisationsgesetz* (School Organisation Act) allow for German Support Classes for children who are not able to follow regular lessons effectively due to a lack of German language skills. These children are classified as “exceptional pupils” and taught in their own classes most of the time, except in subjects such as drawing, music, or sports, where they join regular classes according to their age. This measure applies to all children entering school and those who have just arrived in Austria and thus also to children who have fled to Austria with their parents. The language progress is checked, and basically, pupils either have to stay on in German Support Classes if their progress was not sufficient or they go to regular classes as “regular pupils” if their German has improved sufficiently. The maximum length of stay in German Support Classes is two years. Islamic religious education has been offered in Austrian schools since the school year 1982/83 under the *Religionsunterrichtsgesetz* (Religious Instruction Act). Instructions can be taken up by pupils of all school types. The Islamic Religious Community in Austria (IGGÖ) is responsible for the provision, management, and direct supervision of religious instruction.

Aside from the legislature from the Federal government, the biggest actor is the Austrian Integration Fund (ÖIF), as the integration course provider. There is a rather fragmented landscape of other small providers and funding organizations, not only for beneficiaries of international protection, but also for asylum seekers. The Islamic Religious Community in Austria (IGGÖ) also plays an important role as an actor in the education sector by supervising religious instructions. In rural areas, where there are not enough students to constitute a class for a specific religious community, the function of religious education is delegated to the private sphere.

### Main Trends

The courses for integration provide structure. During reception, integration, courses constitute an important aspect of daily life for many asylum seekers (cf. Josipovic & Reeger 2020b). Given most asylum seekers are not able to access the labour market, these courses provided some of them with a sense of normality and a structure to their lives otherwise characterized by (endless) waiting for a decision on the asylum application.

In addition to the Religious Instruction Act, there exists a broad range of recognized religious communities with the right to teach religion in school. The religious communities organize the lesson and the teachers are paid by the State. These religious instructions are not compulsory. That being said, children without religious affiliation may take part in religion lessons. In May 2019, an amendment to the *Schulunterrichtsgesetz* (School Education Act) was introduced. It stipulates that children are not allowed to cover their heads at school for ideological or religious reasons until they reach the age of ten. The ÖVP-FPÖ coalition argued that this measure protects Muslim girls from being forced to wear headscarves and thus from being instrumentalised by Islamism. At the same time, they underlined that this ban was not directed at the Jewish *kippah* and the *patka* of the Sikhs. In case of noncompliance, parents may be fined with an administrative penalty of 440 EUR.

### Main Problems and Challenges

The challenges for education in Austria are mainly related to the implementation of these policies. One of such challenges has been the misgiving about the compulsory integration studies of the ÖIF programmes. While experts support both the compulsory provision of language classes and orientation classes for beneficiaries of international protection, they exist with high scepticism about the content and format of teaching values within federally supported ÖIF programmes.

Some experts point out how discussions of social and cultural values are not only too limited in scope but also tend to be moralizing by assuming liberal ideals as fully completed and lived realities of Austrians.

One of the challenges posed is the tendency by the federal government and its policies to disregard the slow process that integration into society takes. Another challenge has been the confusion concerning the identification of course providers and the large variation regarding the level of knowledge among participants in the courses.

## GERMANY<sup>21</sup>

### Legal and Institutional Framework

While schooling is compulsory, primary education usually starts at the age of six and elementary school runs from grade 1-4. The German system of secondary education is quite complex as it comprises several different school types from (lower) secondary schools (*Haupt- und Realschulen*; grades 5 to 9/10) to upper secondary schools (*Gymnasium*; grades 5 to 12/13) to integrated comprehensive schools and schools with several tracks of secondary education. According to the Federal Statistical Office, in the school year 2017/18, 11 Million pupils attended school in Germany, 1.2 Million of whom were not German citizens<sup>22</sup>. Although the right of refugee children to school education is uncontested in Germany, it is often only accessible when education becomes compulsory (Vogel/Stock 2017: 33). This compulsory component can be suspended during the reception phase, especially when the children stay in reception centres.

Concerning adult education, once their asylum claim has been positively answered, most refugees have to attend so-called “integration courses” which consist of language training paired with an overall introduction into the German political system. For accepted refugees, taking part in an integration course is compulsory, whereas asylum applicants are only allowed to take the course if they have a “good perspective of staying” in Germany.

Among the actors in the field of education, teachers at regular schools and community colleges as well as those who are teaching the integration courses play an important role. Furthermore, integration officers, the personnel at the reception centres, administrators of the refugee accommodation centres and social workers play their part when it comes to the integration of refugees/asylum seekers in the German education system. In addition, NGOs as well as volunteers from civil society such as student initiatives play a key role in the field of education by offering e.g. mentoring programmes and legal advice. Thus, the commitment of volunteers is essential for non-formal education as they offer diverse learning opportunities (e.g. German language), leisure activities as well as mentoring and “godparents” (“Paten”) programmes. Moreover, co-ethnic networks (i.e. relatives, friends, etc.) provide help in the initial stages of education by giving administrative and moral support.

### Main trends

Most recent policy issues in the German education system have centred on educational inequality and inclusion of pupils with specific needs. The debate on the topic of inclusion has also tackled the discussion on the schooling of refugee children (separation in special classes vs. inclusion in regular classes). Although refugee children usually take German language

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<sup>21</sup> Chemin, J.E. and Nagel, A.K. (2020, June 3). Integration Policies, Practices and Experiences – Germany Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3874426>

<sup>22</sup> [https://www.destatis.de/DE/Presse/Pressemitteilungen/2018/03/PD18\\_089\\_211.html](https://www.destatis.de/DE/Presse/Pressemitteilungen/2018/03/PD18_089_211.html) Accessed 13/05/2020.



classes before being integrated into regular classes, their individual competences are not assessed systematically before being allocated to schools (Vogel/Stock 2017: 34).

In terms of higher education, the German Academic Exchange Services (DAAD) has established measures for the integration of refugees in the German higher education system and has launched an information portal for this purpose<sup>23</sup>. Also, special scholarships have been implemented such as e.g. funds for “threatened researchers” by the Philipp Schwartz Initiative of the Alexander von Humboldt Foundation. Furthermore, the universities themselves have taken action by introducing special measures for the integration of refugee students such as special office hours, language courses, more flexible entry requirements, and the possibility of being enrolled as a guest student.

Concerning adult education, two forms must find consideration: formal and informal education. Formal education is received in the aforementioned integration courses, as well as in language classes and preparatory classes (e.g. to prepare for enrolment at German universities) carried out at e.g. community colleges (“*Volkshochschulen*”). Informal education in form of language learning and the development of intercultural competences is aimed at in e.g. Intercultural Learning Workshops (“*Interkulturelle Lernwerkstatt*”), administered by the regional state admission authority of Lower Saxony (Niedersächsisches Kultusministerium 2017, 3) which has been classified as an interim measure by the Refugee Council by pointing out that the Learning Workshop cannot replace regular schooling measures.

A certain determination and resilience about learning can be inferred from the interviews with asylum seekers and refugees, whereas women seem to conclude higher levels of formal language learning. The integration courses mentioned above have been assessed in two ways: While some view these as a good basis for further learning, others have criticised the courses stating that the content was of discriminatory character (e.g. textbooks which were not inclusive and dominantly representing a Eurocentric perspective). Many of the interviewees claimed that they would like to continue their (formal) education or begin an academic study program for the first time as some of them considered this as a way forward. Thus, adult education/life-long learning becomes important constants for people who have lost everything to the conflict(s) in their home countries.

### **Main Problems and Challenges**

One of the major challenges is the language learning process in Germany. The asylum process itself can significantly delay the language learning process. Asylum seekers and refugees face difficulties with learning the language and the problem of not having the means or even the time to do so. For some, employment is far more essential and an urgent necessity than language learning. It may happen that a refugee finds a job before he or she finds a position in a German language course. Furthermore, refugees often live in remote accommodation centres where connectivity is difficult and the nearest language school can be hard to access. Until the first decision on the asylum case is made, there is no assurance that the individual will receive free language classes; language learning therefore becomes a “luxury” that cannot always be afforded. Another challenge some refugees face (especially those from sub-Saharan Africa) is that they are not considered to be “priority” in terms of free tuition, with Syrian, Afghan, Iraqi and Eritreans taking most of the places allocated in the courses available.

The issue of documentation not approved or recognised by the German educational boards or higher education institutions is a common problem among refugees. Refugees also feel like they are being held back in terms of their education for lack of acceptance of foreign certificates and academic qualifications. There is a lack of systematic evaluation of the abilities and learning

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<sup>23</sup> <https://www.study-in-germany.de/en/> Accessed 13/05/2020.

needs of students before they are assigned to schools. While teachers and volunteers often make great efforts to help refugee students take part in their classes, they are often not well equipped to teach their lessons in a group that includes German language learners. There are fundamental structural obstacles and there is only anecdotal evidence of refugees' access to higher education. Civil society and higher education institutions in Germany undertake efforts to address the needs of refugees and help them access tertiary education, but these efforts are neither systematic nor focused on an integrated strategy. However, often the process of entering a German university can be lengthy. Refugees who are unable to access formal education, there are volunteers and civil society organisations that arrange informal educational facilities, however, there are no measures of regular schooling. Language learning is fraught with difficulties and barriers created by the asylum process itself. For instance, placing refugees in remote and low populated areas with little contact to the local people impedes effective language learning and social integration in general. Sometimes refugees are barred from attending language schools due to their status. The so-called “integration courses” have been criticized for being stereotypical and non-representative of the populations who attend them: textbooks used are not as inclusive of populations as they should and the content and examples often used represent a rather white, male, European view of Germany and the world.

## **GREECE<sup>24</sup>**

### **Legal and Institutional Framework**

The education can be categorized in two main branches in the Greek system; formal education for children and teenagers, and informal education for adults. For children, access to their formal education comprises an interplay of laws. The Greek Constitution under Article 16 in conjunction with Article 28 of Convention on the Rights of the Child guarantees the right to education. The Greek law of 1566/1985, and 2910/2001 mandates compulsory education for all children in Greece aged between five and fifteen years old. This compulsory education includes pre-primary, primary and lower secondary education, and optional upper secondary education, general upper secondary school and technical vocational school. The mandate of this Law extends to all children in Greece, including refugees and asylum seekers. Children beneficiaries of international protection access to this compulsory formal education are established in Article 28 of Law 4636/2019. Authorities and parents are both mandated to provide and ensure that this access to education is followed. To augment the access to formal education reception classes were established in Zones of Educational Priority (ZEP) under Law 3879/2010. Such reception classes have been in operation in certain public primary and secondary schools since 2010. These classes are integrated in the mainstream educational system, which the students attend in parallel alongside Greek students. The schools where Reception Classes are currently operating are stipulated by Ministerial decisions. To further integrate children into the educational system, there exists an Intercultural school established by Law 2413/1996. This school model was considered the first significant step towards an education that would not only aim at assimilation but at the integration of children from diverse cultural backgrounds (Karzi and Tselepi 2018). Teachers are recruited on the basis of their experience in intercultural education, their knowledge of the mother tongue languages of the students and their capacity to teach Greek as a foreign language (UNHCR 2020). The curriculum of intercultural schools is the same as that in the mainstream state schools, with modifications aimed at adapting the curriculum to suit the needs of the multi-ethnic student population, as well as at the satisfaction of its learning

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<sup>24</sup> Leivaditi, N., Papatzani, E., Ilias, A. and Petracou, E. (2020, June 9). Integration Policies, Practices and Experiences – Greece Country Report (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3886993>



and social needs (Markou 2011). Special programmes are also applied, emphasising on intercultural communication and on the educational and cultural particularities of the students, who may also attend Reception Classes offering Greek language lessons (CERD 2017).

Adults' education is largely informal in Greece, and falls under the competence of the General Secretariat for Lifelong Learning of the Ministry of Education. Adult refugees and asylum seekers have the possibility to attend a series of vocational training programmes, provided to Greeks and foreigners alike. A significant initiative in the field of adult refugee education is the HELIOS Project, implemented by the IOM (IOM 2019). The project aims at promoting the integration of beneficiaries of international protection currently residing in temporary accommodation schemes in Greece through integration courses within Integration Learning Centres. Only refugees or beneficiaries of subsidiary protection recognised after 1 January 2018 can benefit from the HELIOS Project (IOM 2019).

The Greek government in its enactment of laws and policies provide formal education. Non-governmental Organizations and Civil Societies provide informal education and help fill in the gaps left by the government. Vocational Training Centres (KEK) design, organise and provide courses in continuing vocational training for employees, the unemployed and school leavers from all levels of education in many different subjects and implement relevant projects. Centres for Lifelong Learning (KDVM) and public or private Vocational Training Institutes (IEK) also operate across Greece, providing adult education (European Commission 2020).

### **Main Trends**

The education system in Greece is contingent on several provisions and initiatives. As mentioned before, education for the children of refugees, asylum seekers and persons under international protection is largely formal. There are extensive policies to ensure access to this formal education. Aside from the reception classes in the Zones of Educational Priority (ZEP), there are other initiatives to buttress formal education and aid in their integration.

Education is provided to refugees either through the school units of primary and secondary education of the mainstream educational system – namely, to children living in dispersed urban settings who enrol in the standard morning classes of public schools near their place of residence, alongside Greek children – or through the Reception Structures (DYEP) operating in the framework of the mainstream educational system, as afternoon preparatory classes taking place in public schools, neighbouring camps or hot spots, for children aged 4-15 years old (AIDA 2020c). These classes take place after the morning classes for Greek children have been completed. This educational programme thus aims to facilitate the integration of refugee and migrant children into the educational process in a way that will gradually allow them to join mainstream classes in Greek schools. There are no specific provisions facilitating the access of refugees to higher education in Greece. They may access universities under the same conditions as Greek nationals, upon participation in entry examinations organized by the Greek state. That being said, certain qualifications are needed. These qualifications included necessary documentation from third-country nationals who have attended education in their country of origin.

As mentioned, adult education is informal. While the government through the Institute of Educational Policy have tried to develop proposals and provisions of informal educational activities, the informal education is still provided by civil society actors in urban settings, as well as inside or near refugee reception facilities due to the persistent difficulties in the field of formal education for refugees in Greece.

## Main Problems and Challenges

Despite the legislature, provisions and initiatives, there are still challenges to access to education. One of the first challenges is the compromised educational objectives which result from sub-par teaching staff. In addition, there are also an insufficient number of teachers with relevant experience and appropriate skills. Furthermore, there exist structural problems such as recruitment of teachers with reduced working hours, constant teacher rotation, inadequate training and support with regards to bilingual and intercultural education (Tzoraki 2019). Another challenge is the language barrier. The lack of Greek language impedes successful integration and access to education. Currently, while there exists no distinction between Greeks and asylum seekers and refugees pertaining to higher education, refugees still find their access hindered by language requirements and bureaucratic procedure. Indeed, it is reported that the number of non-Greek students in Greek universities is small in comparison to the overall number of domestic students and that adults with an immigrant background (including refugees and asylum seekers) are less likely to enter higher education institutions in Greece (OECD 2018).

Another challenge is the shortages in the capacity of NGOs. As mentioned, adult education is informal and hugely undertaken by NGOs who provide informal educational support to asylum seekers and refugees. This bulk in educational support results in capacity shortages thus making it difficult to provide adequate educational services. A pivotal challenge is the structural deficiencies of the Greek government and by extension the policies of education. Despite the policies and initiatives provided by the government, structural problems result in deficiencies such as delays in the operation of Reception classes on a yearly basis, long lists of enrolments to schools (especially in the urban settings). Besides there are challenges linked with mobility of population between islands and mainland, delays in establishments of schools, and difficulties regarding integration of enrolled children in Reception/Preparatory structures. Moreover, there is the challenge of the local population. This is most evident in the protests from groups against policies in the public schools. These antagonistic reactions result in racist narratives, and conflicts that stall the education and integration.

## IRAQ<sup>25</sup>

### Legal and Institutional Framework

Once the refugees' legal status becomes legally approved, the refugee parents have the right to register their children in any Iraqi public school. On the level of higher education, universities are free of tuition for Palestinian refugees only. Non-Palestinian refugees' admission to the Iraqi university system falls under the authority of the expatriate department in the Ministry of Higher Education and Scientific Research. In case the refugees have passed the secondary certificate in scientific and literary branches of Iraqi schools, they apply to the general comparison of universities in Iraq. Degrees are subject to ratification and recognition by the Iraqi Ministry of Education (Muhammad 2020). Undergraduate refugee students follow a special process in order to set their completed courses in accordance with the courses offered at Iraqi universities so that they can conclude their specialisation within the Iraqi standards.

Teaching in the camp schools is carried out by teachers who are appointed by the Education Directorates to which the schools belong. Most of the teachers are Syrian refugees who reside in the camps themselves. Kurdish language teachers include citizens of the Kurdistan Region of Iraq (KRI). In some camps, there are cultural centres that provide activities in the frame of adult education and kindergartens. These are overseen by the Barzani Charitable Society that also

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<sup>25</sup> Warda, W.K. and Almafraji, H.S. (2020, September 8). Integration Policies, Practices and Experiences – Iraq Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4019804>

provides financial and in-kind support to these centres (HCCS, 2018). Furthermore, the Barzani Charitable Association and Hammurabi Organization for Human Rights (HHRO) built a school for displaced persons and refugees and provided educational supplies such as stationery and blackboards. The organisation Christian Solidarity International (CSI) also cooperated in support programmes by e.g. financing water purification systems. Temporary education centres have also been established by the Norwegian Refugee Council (NRC). In addition, the NRC has provided awareness-raising and counselling programmes for refugee students, has set up remedial courses for poor-level students, established schools, equipped them with supplies and paid the salaries of informal teachers.

Thus, I/NGOs have significantly helped to support Syrian refugees in Iraq by providing funds to promote education. Among these are the French Agency for Technical and Development Cooperation (ACTED) as well as the SPARK organisation, an NGO covering initiatives providing fellowships for young Syrian refugees in the KRI (among other regions/countries). Additionally, the HOPES project which focuses on supporting the education sector and small businesses involved in education and on providing scholarships for Syrian students so that they can gain access to universities in the countries of the Middle East was implemented by the German DAAD in cooperation with the British Council and the Campus France (MERI 2019), (MHE-KRG 2017c). Moreover, the International Rescue Committee (IRC) set up schools in the camps, paid salaries of teaching staff and carried out their qualification. Other I/NGOs supporting refugee education in Iraq are the French International Primary Relief Organization and Save the Children.

A main actor in providing support in the educational sector is UNESCO. By establishing secondary schools, focusing on teachers training, organising compensation classes for out-of-school children and by extending the scope of information and communication technology courses and increasing access to information for young people UNESCO supports refugee education in Iraq (HCCS, 2018). The Kurdistan Regional Government has been cooperating with international organisations to create schools in the KRI e.g. in cooperation with UNESCO so that the construction of secondary schools in each of the camps (Domiz, Darshan, Corcus) was financed with money from the Emergency Relief Fund and the Central Emergency Response Fund (UNESCO 2014).

Furthermore, foreign governments such as the German government, initiated programmes (such as the DAFI initiative) which focus on supporting refugees/asylum seekers in completing their university studies in countries of asylum. DAFI, in specific, affords study expenses, monthly funding, health insurance, transportation, university housing (HCCS 2018). Moreover, the European Union as well as the International Refugee Organization have provided for funding to ensure the completion of university degrees in the KRI. This also includes fees, housing, transport, and health insurance (MHE-KRG 2017).

## **Main Trends**

The enrolment rate in camp schools has reached 71% compared to 46% outside the camps (MERI 2019). According to a report by the Joint Crisis Coordination Centre (JCCC), 62% of Syrian children aged 6-12, are not enrolled in education in formal/informal schools (JCCC 2019). In the KRI, which has experienced a high influx of newcomers/refugees from Syria, the number of schools in the camps was a total of 31 schools until the academic year 2018 and the focus in these schools is more on recreational activity than on the educational aspects. However, due to the number of refugees residing outside the camps and the displacement of Iraqis from Mosul, Ramadi and Salah al-Din to the Kurdistan region of Iraq in 2014, the number of schools for refugees reached the number of 55 schools until March 2019 (JCCC 2019). In the border governorate of Anbar with Syria, a school has been opened in each of the three camps such as

a primary school in Al-Qa'im camp and NGOs supported by UNICEF opened supplementary schools for children to play games and sports (Muhammad 2020).

Although there has been an increase in schools, the classroom situation is strained due to overcrowded classes (HCCS 2018). One of the reasons for this is the lack of personnel (UNHCR 2016a). Additionally, the schools are overcrowded, and the lack of sufficient educational resources worsens the situation. Teaching staff is rare as the teachers' salaries were reduced to less than \$200 a month, whereas previously they received \$400. Also, the UN support of \$200 for the teachers was stopped, for volunteers in humanitarian work. Also, a JCCC report indicates that at the end of 2018 the teachers' contracts were not renewed.

Temporary education centres in the camps offer lessons in arithmetic and literacy as well as recreational activities. In terms of higher education, only 1% of refugees attended universities (UNHCR 2016b). In general, the percentage of students admitted to universities in the KRI is low, due to limited places and limited budget. However, there are scholarship programmes available for refugee students such as grants by the European Union (MHE-KRG 2017). Other support programmes are e.g. supported by the German government and aim at helping refugees/asylum seekers to complete their studies at university in the host country.

### **Main Problems and Challenges**

Due to the difficulty of obtaining educational certificates from previous schools in the home country, many refugees face the challenge of registration in the school systems of the host country. In addition, there is a huge weakness among asylum seekers and refugees in terms of interest in education. Sometimes, Syrian asylum seekers in Iraq are unable to participate in vocational training and programs, primarily because of their own situations: taking care of children or trying to seek livelihoods. Syrian refugees, especially marginalized groups of children with special needs or people with disabilities, are by far the most impacted and face significant educational difficulties that have a negative impact on their integration into society. Girls face cultural challenges going to schools, in addition to physical barriers. The economic hardships and the lack of any family income are among the most consequential challenges which increases the chance of dropping out of school and the child labour, because turns to begging or working on the streets (MERI 2019). Teachers' salaries were reduced from \$400 to \$200 that led a large number of teachers to drop out of the education sector. This forced schools to replace qualified teachers with new, less experienced and less qualified staff (HCCS 2018). According to the Joint Crisis Coordination Centre (JCCC), lack of funding from donor countries and international organizations in providing material and technical assistance to the KRG lead to a risk of closure of a high percentage of schools for refugee students at the end of 2018.

Another major challenge is the lack of schools where the medium of instruction is Arabic. A large number of Syrian refugee students could not continue their education because of the KRG's adoption of the Kurdish language in government schools. This created a burden on private schools and was unable to accommodate such large numbers of refugee students and most children who arrived between 2013 and 2014 in the region remained without education (Lateef 2015). Students who were admitted to universities struggled with English curricula since they were required to take remedial language courses and that added economic burdens to their educational costs (HCCS 2018).

## ITALY<sup>26</sup>

### Legal and Institutional Framework

In Italy, schooling is compulsory up to the age of 16. However, kindergarten (*“scuola dell’infanzia”*) is non-compulsory and comprises 3 years of nursing school. This is followed by primary school (*“scuola elementare”*) that includes 5 years of primary education. Lower secondary school (*“scuola media”*) entails 3 years roughly for the ages from 11 to 14. Besides, there is upper secondary school (*“scuola secondaria di secondo grado”*) that is 5 years with 3 different macro specialisations: lyceum, technical institute, and professional institute. Lastly, there is university education.

Article 38 of Legislative Decree No. 286/1998 provides foreign pupils with the same rights (and obligations) in terms of access to the Italian education system like Italian pupils. In general, pupils under the age of 16 are assigned to a grade that corresponds to their age. In case the pupils are over the age of 16, the assignment to the grade depends on an entry-level test they have to take. Enrolment of the pupils at Italian schools can take place any time of the school year and the teacher’s board can introduce specific measures to foster the learning of the Italian language such as additional intensive courses.

Ministerial Decree No. 643/2017, supplemented by Ministerial Decree No. 685/2017 reorganised the National Monitoring Centre for the integration of foreign students and inter-culture that elaborates proposals or recommendations by the Minister of Public Education. The “Integration Agreement” governed by Presidential Decree No. 179/2012 establishes that non-Italian nationals who hold a residence permit with a minimum validity of one year must reach at least level A2 of the Italian language. The recognition of the equivalence of their educational qualifications can be requested by the beneficiaries of international protection.

Within the national education system, the Ministry of Public Education as well as the teachers play a key role. The Ministry of Public Education identifies tools and guidelines to support teaching and the integration of refugees/asylum seekers into the Italian education system. Additionally, civil society associations organise educational programmes for adult learning. An example for this is the association “Anelli mancanti” which launched free language courses for economic migrants in Tuscany. This organisation also promotes knowledge about the Italian culture and supports the refugees/asylum seekers to settle into the new environment by e.g. helping them to find a job (e.g. by giving assistance in writing a CV). The organisation ASGI launches language courses for asylum seekers that are taught by teachers from the European University.

### Main trends

The national education system should ensure the linguistic integration of minors through Italian language labs organised by the schools that should encompass 8-10 hours per week, for the duration of 3-4 months<sup>27</sup>. Whereas no preparatory classes are required, it is the responsibility of the teachers’ board to implement individualised/group initiatives (e.g. additional classes) in order to work towards the integration of refugee pupils. Guidelines by the Minister of Public Education suggest the integration of non-Italian students into regular classes to avoid a separation of the pupils. Administrative provisions by the Minister of Public Education (*circolare ministeriale* no. 2/2010) define that the percentage of non-Italian pupils in class should not exceed 30%.

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<sup>26</sup> Ibriido, R. and Marchese, C. (2020, June 15). Integration Policies, Practices and Experiences– Italy Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3894103>

<sup>27</sup> “Linee guida per l’accoglienza e l’integrazione degli alunni stranieri”: <http://www.centrocome.it/wp-content/uploads/2014/11/4-Linee-Guida.pdf>



Presidential Decree No. 19/2006 aims at increasing the recruitment of teachers who are specialised in teaching the Italian language to non-native speaking pupils.

The linguistic integration of adults is targeted through courses at the Provincial centres for adult education and training (CPIAs – Centri provinciali di istruzione per adulti) which provide adult refugees with language and social integration classes. Furthermore, civil society associations organise educational programmes as well as leisure and welcoming activities for free. In 2017, funding of 4 million Euros for the purpose of special teacher training was provided by the Minister of Public Education.

### **Main Problems and Challenges**

While there are equal rights and responsibilities in terms of access to the Italian education system for unaccompanied minors, children of refugees and asylum-seekers and other immigrant children, linguistic and social barriers still hinder students with a migration background from achieving the same objectives as native students. Language is the key instrument of integration into the country but, unfortunately, in many cases, the CPIAs courses do not have adequate standards. There is a strategic importance of free compulsory language courses, particularly in the context of the integration of beneficiaries of international protection into the labour market; however, there is a lack of adequate financial resources (approximately EUR 21 million compared to EUR 240 million invested in Germany) for the implementation of this policy (Cerrina Feroni 2017; Ibrido & Maggini 2019).

## **POLAND<sup>28</sup>**

### **Legal and Institutional Framework**

#### *Refugee children*

Beneficiaries from international and national protection have the same access to education as Polish citizens. This includes free and unlimited access to education in public schools up to the age of 18 or the completion of higher school (education is compulsory until the age of 18; Article 70(1) of the Constitution of the Republic of Poland of April 2, 1997 (journal of Law 1997 No. 78 item 483 with amendments)). The Law of 14 December 2016 – Law on Education (consolidated text, Journal of Laws 2020, item 910) specifies the obligation of education by determining compulsory schooling for all children from the age of 7 until the age of 18 (Article 35(21)). Article 31(4) specifies the obligatory one-year pre-school preparation for all 6-year-olds, which can be carried out in primary schools or kindergartens. As of September 2019, compulsory education lasts for 9 years and entails one-year of pre-school education and 8 years of primary school education. There is full-time compulsory education that obliges pupils to attend 8 years of primary school (aged 7-15 years). Part-time compulsory education applies to pupils aged 15-18 and this form may take place in either a school setting or non-school setting (e.g. vocational training).

Immigrants' children are subject to compulsory schooling. There are additional, free Polish language classes (not time-limited) as well as compensatory classes in case the teachers recognise the need for additional support due to curriculum differences for up to 12 months. Preparatory classes (also called “welcome classes”), introduced by the Law on School Education, offer Polish language learning and support with settling into Poland. These preparatory classes usually last for one school year, whereas they can be shortened or extended by a maximum of one school year in individual cases (Law on School Education, Article 165 para

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<sup>28</sup> Sobczak-Szelc, K., Pachocka, M., Pędziwiatr, K. and Szałańska, J. (2020, August 30). Integration Policies, Practices and Experiences – Poland Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4008666>



11). Moreover, children have the right to the assistance of a person, a so-called “cross-cultural assistant” who knows the language of their country of origin and who is basically employed as a teacher’s assistant. The time period for this form of assistance is limited to 12 months (Law on School Education Art 165 para 8).

### *Adult Education*

In terms of adult education, the Law on Social Assistance establishes that for every beneficiary of the Individual Integration Programme (IIP), the attendance of a Polish language course is compulsory, if his or her language proficiency is not at a sufficient level. Whether or not this is the case is assessed by the Poviats Family Support Centre (Law on Social Assistance, Article 93(1)). The costs for the course are covered by the benefits received through the IIP (Art. 92. 1.b). The Law on School Education also concludes that beneficiaries of international and national protection have access to education in public school for adults, public post-secondary schools, public art schools, public institutions and colleges of social service employees and vocational qualification courses under conditions applicable to Polish citizens (Law on School Education, Art 165(3)).

### *Higher education*

Considering higher education, refugees and beneficiaries of subsidiary protection have access to universities on terms applicable to Polish citizens. Thus, studying at public universities is for free if the individuals are admitted to university (this depends on a completed secondary level education and a maturity certificate confirming eligibility to apply to university). Authorities, which carry out the confirmation/recognition of higher education diplomas, are higher education institutions authorised to grant the academic degree of a doctor (PhD) in a given field of science or art (Law on Higher Education, Article 327). The Law on Education System of 1991 specifies that foreign school certificates, diplomas or other educational documents may be recognised in Poland either automatically (certificates/diplomas obtained in the EU, EEA, OEC member states, MEN, 2019a) or through an administrative recognition procedure carried out by a province education superintendent. It pertains to certificates, diplomas or other educational documents that confirm the completion of secondary education in the European Union, European Economic Area (EEA) or OECD member states (MEN, 2019a).

The above-mentioned cross-cultural assistants function as mediators between the children and teachers as well as between the school and the parents. By accompanying the pupils through their school day, these assistants function as the main contact persons for the pupil(s). He/she clarifies tasks, helps bridging the language barrier by being able to devote more time to specifically explaining things and by – ideally – speaking the same language as the pupils and coming from the same cultural background. In some cases, NGOs provide cross-cultural assistants within their projects. Furthermore, regular teaching staff has been highly involved in the support of refugee children by devoting time to individual consultations with the pupils and developing activating methods in class often resulting in extra-curricular and over-time work for the teachers themselves. Moreover, the school management, such as the headmasters, have to show willingness to foster additional, non-obligatory activities, such as anti-discriminatory education.

Among the most active actors in the field of education are NGOs working in the field educational integration of refugee children. As such they organize language classes as well as cultural classes on e.g. Polish customs and geography, they provide training and proper preparation of teaching staff and other school employees, e.g. training on topics such as multiculturalism. NGOs who work in this field are, among others, Polish Migration Forum Foundation, Foundation Ocalenie, Polish Humanitarian Action etc. (Piechowska 2016:35). Within NGO project work such

as “You can get an education in Warsaw!”, implemented by the Polish Migration Forum in 2009-2011, psychological and educational support was also offered (Ślusarczyk et al. 2015: 17-19).

### **Main trends**

In terms of in-school-integration, Poland applies the integration model which aims at setting up classes consisting of refugee children and children of the host country of the same age/the same level of knowledge. Since 2017, the mixed model that includes special language learning classes for refugee children paired with classes they take together with children from the host country and in which the command of the Polish language is not essential (e.g. gymnastics, artistic classes) has become common. Preparatory classes that are organised to acquire the Polish language are mainly put in practice in big cities and depend on funding and a continuous attendance of the pupils (which might not be given because of e.g. the movement of the family to other European countries). It is emphasised that an individual approach of teachers and school employees such as individual meetings or individual extracurricular activities for refugee children is very important with respect to their progress and interest in learning. In this respect, identifying fields in which the children are good at and in which they can develop their personal skills by e.g. setting up wrestling classes (embraced by pupils from Caucasus where wrestling is the national sport) has been supportive in the socio-educational integration of refugee children.

Between 2014 and 2017, schools were obliged to implement anti-discrimination activities (Ordinance of the Minister of National Education of 10 May 2013; Ordinance of the Minister of National Education, 2013). However, this provision was abolished in 2017. Nevertheless, local governments, which administer the schools, can introduce anti-discriminatory education. After coming to power in 2015 of the Law and Justice party (Prawo i Sprawiedliwość), AMIF funding for NGOs was suspended and the limitation of EU funding opportunities for schools led to the cutting of projects aimed at integration. In addition, the anti-immigration/anti-refugee sentiments in the society were strengthened which also resulted in changed curricula with anti-discriminatory classes being removed.

Adult education for beneficiaries of international protection includes Polish language learning, vocational training and tertiary education. NGOs, such as the Ocalenie foundation and the Refugee. PI foundation, almost exclusively carried out Polish language learning courses as no funds from the state budget were allocated to conducting Polish language courses. A significant delay in the entry into force of the new financial mechanism of the Asylum, Migration and Integration Fund (AMIF) for 2014-2020 threatened the continuity of course (Najwyższa Izba Kontroli 2015, 40-42).

Concerning the access to universities for refugees/asylum seekers who want to continue their studies in Poland, there are several documents which need to be attached such as documents certifying graduation, exams passed, etc. (Ordinance of the Minister of Science and Higher Education, 2018, para 9(2)). Refugees who hold university diplomas are not entitled assistance from family support centres in the procedure of the recognition of their diplomas in Poland (Górny et al. 2017: 67).

### **Main Problems and Challenges**

NGO activities are celebrated by schools, but their collaboration with local and central governments also turns out to be a much more complex matter. Despite their lobbying efforts, the Ministry of National Education is very reluctant to listen to the recommendations of NGOs and to amend the regulations. There are criticisms of compensatory lessons and additional Polish language classes, preparatory classes as well as cross-cultural assistants. Polish lessons also take place at times when refugees work and in areas far from their places of residence. There is a lack of organized childcare during language lessons, which makes it difficult for women

with children to take part in such lessons. According to refugees, Polish language courses, if available and accessible, are inadequate and not effective. The circumstance of lack of access to language courses for refugees with special needs is particularly problematic for the elderly who struggle more to learn language.

School curricula often do not include the basic language skills and social skills required by refugees. In addition, there is insufficient funding for schools with immigrant children and lack of methodological support for instructors. Schools typically schedule two hours of additional Polish language lessons each week, which is insufficient and is not arranged at all in some schools. Insufficient numbers of cultural assistants are employed in classrooms, which should be increased. Refugee children face difficulties due to lack of documentation on their education, qualifications and diplomas, making it very difficult for them to get into the appropriate program / grade (Cerna 2019). Refugees and beneficiaries of subsidiary security have free access to public universities, but the lack of documentation verifying their qualifications or university degrees earned in the country of origin often preclude them from actually studying at a university.

## **TURKEY<sup>29</sup>**

### **Legal and Institutional Framework**

Since 2016, migrants under TPS are eligible to attend Turkish schools, including universities (AIDA 2019, p. 138-140; Kaya 2020a, p. 52). Forced Syrian refugees, upon arrival attended Temporary Education Centres (TEC). The TECs had initially been setup to teach the Syrian school curriculum in Arabic (Celik and Icduygu 2018; Kaya 2020b, p.52-54). Later, the State laid out more clear procedures for enrolling Syrians in Turkish national schools, and they began closing the TECs.

The Ministry of Education, under its lifelong learning umbrella offers courses for adults (specifically those not university-bound). This learning takes place in the Ministry's Public Education Centres or at municipality centres for vocational training, such as the İstanbul Metropolitan Municipality's Sanat ve Meslek Eğitimi Kursları (İSMEK) in the case of İstanbul. In all these centres, classes are free of charge (Nimer and Oruc 2019, p. 3). In absence of a national policy requiring Turkish mastery, participation in these courses is optional though refugees are generally very eager to learn Turkish. That being said, there have been efforts from the EU to improve Syrian refugees' access to the Turkish education. In 2016, the Project for Promoting the Integration of Syrian Children in the Turkish Education System (PICTES) began with 300 million euros of funding from the EU.

The Turkish government (the Ministry of Education) is the major with the help of all organizations that provide assistance, which includes provincial bodies, non-governmental organizations and input from the EU.

### **Main Trends**

Even though migrants have access to Turkish schools, around one third do not participate in the educational system. The gap between population size and participation number is particularly high for high school students, posing a grave danger for Syrians and Turks (ICG 2019). Syrian parents seem to highly value education and endeavour to enrol their children in school when possible, but access to education constitutes a variety of factors; the first being registering their children into the Turkish schools. Some Syrian families could not transfer the needed documents from Syria or from the Temporary Education Centres (TEC). On the other hand, some parents

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<sup>29</sup> Rottmann, S.B. (2020, May 30). Integration Policies, Practices and Experiences – Turkey Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3865824>

were able to transfer to national schools with no trouble. However, there are still some school directors who demand documents that families may not have when they try to register their children.

There is also a demographic difference in access to education. Even when women speak Turkish, their access to school is shunted. The primary reason for not attending a language course in the UN Women study was a lack of child care services. Other reasons include not finding the courses useful, being unaware of courses, being unsure about what to do and not having time, or that their spouse did not allow them to attend (UN, 2018, p. 40). People with Temporary Protection Status are allowed to attend Turkish universities, but must first pass a foreign student exam and Turkish language competence exam. But not many are able to adhere to this stipulation as the cost of the exams and the necessity of knowing Turkish is a barrier for many (Erdoğan et al. 2017). Yet, compared to an average of 3% worldwide, Turkey has reached 6% enrolment of refugees in higher education (UNHCR 2019a).

### **Main Problems and Challenges**

There are significant challenges to migrants' access to education. First major challenge is the language barrier. Teachers in the centres are often not trained to teach Turkish as a second language, rather they need only a degree in Turkish language or Turkish literature to become instructors. Thus, students who are of different levels in terms of age and ability are sometimes grouped together. And given that participation is optional, more highly educated and literate migrants are more likely to stick with the classes and show improvement (Nimer and Oruc 2019, p. 4). For students who are in school, interrupted schooling or lack of Turkish may mean that older students are put into the same classrooms with younger students leading to academic and social problems that children face discrimination and bullying in schools (AIDA 2019, p. 139). Some children are not able to attend school or quit their education because they have to help their parents in finding a job and supplementing their family income. And even when enrolled in schools, children sometimes encounter discrimination from other children, which negatively impact academic performance and mental health.

Adults also have certain challenges to their access to education. Most male adults have to choose between the classes or work. And given that most males cannot afford to leave jobs for daytime classes, many men do not attend these classes. Of course, women's access to these classes is also limited by various factors. Several parents feel confused and unable to manage their children's schooling because of lack of knowledge of the Turkish system and lack of language ability. Some parents are also worried about a loss of their Arabic mother tongue with many worrying that their children will forget Arabic or not learn to read and write in that language. This fear comes from the fact that the Turkish school curriculum is only available in Turkish and the Arabic language offered in the TECs are progressively closing, making it difficult for Syrian students to access education in Arabic.

## **SWEDEN<sup>30</sup>**

### **Legal and Institutional Framework**

Education is one of the strongest pillars of the Swedish integration system and thus entails formal education, non-formal education, and education from the perspective of asylum seekers and refugees. Children present in Sweden under the Law have a right to school and a right to

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<sup>30</sup> Cetrez, O., DeMarinis, V., Pettersson, J. and Shakra, M. (2020, July 19). Integration Policies, Practices and Experiences – Sweden Country Report (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3951714>

education even when their parents face an expulsion order, and this extends to teenagers under the Upper Secondary Education Act (2016). Children under 18 who seek asylum have full access to the school system even during the asylum process. Asylum-seeking children have the right to attend school in Sweden and schools are required to enrol newly arrived children, including asylum seekers, within one month of their arrival where they are integrated into regular schools. During the asylum process, adult asylum seekers are only provided with informal or semi-formal language courses. But upon receiving a positive decision for their asylum application, they earn the right to access formal education, which starts basically with language acquisition. A variety of language courses are provided by different institutions. Though, the municipalities organize the language courses within the concept of introduction programmes such as the Swedish for Immigrants (*Svenska för invandrare*, SFI).

The Swedish government, agencies such as the Swedish National Agency for Education (SNAE), School Administrative Board (Länsstyrelsen), counties, municipalities and civil societies.

### Main Trends

Sweden, having received a large number of migrants in 2015, made education a clear focal point. This focus pertains to access of education to not only children, but to adults as well. For children, there is a focus in providing basic formal education. In this regard, preparatory courses are offered for those who have to improve their skills in Swedish and core subjects. Another measure to augment this access to basic education is the right for mother tongue education. Therefore, should more than five children speak the same language in the school district, they have the right to lessons in their mother tongue on a regular basis. In addition, following a regulatory change in August 2016, schools are now allowed to contract digital providers or other schools for mother-tongue instructional services. The National Agency for Education is also exploring the possibility of using online learning to supplement instructional capacity in other subjects (Fratzke 2017). This ensures not only an improvement in their performance in school but also their learning of Swedish (Barthoma et al. 2020). In some larger districts (Stockholm and Malmö), there has been the creation of “sprint” and “start-up” courses, designed to help students who do not speak Swedish during the first or two years of arrival. This programme makes use of a mixed schedule between regular classes and preparatory classes. And depending on the students’ development, there is a chance for a gradual transfer into a regular teaching group.

Adult immigrants have also been included in the educational curriculum. As both government agencies and refugees perceive learning Swedish as the most important factor for employment in the Swedish Labour Market and subsequent integration into the Swedish society. Thus, integration policies place a huge focus on language training as a main tool for integration into Swedish society. Although recent changes in integration policies have somewhat shifted focus towards labour market participation as its main focus. The introduction and studying of Swedish to immigrants is provided by Swedish for Immigrants (SFI) programme. The programme is designed and funded by the Swedish National Agency for Education but organized and offered by the municipal adult education divisions, called KOMVUX (*Kommunal Vuxenutbildning*). Lessons are available and mandatory to those who receive financial compensation and for all who have residence permits (Barthoma et al. 2020).

To ensure this education, both municipal, adult education schools and private school providers such as *Folkuniversitet* can provide SFI. Yet access to these lessons involve some stipulation: in order to access free SFI classes, refugees must legally reside in Sweden, be registered with the Swedish Tax Agency, have a personal identity number and have reached the age of 16. SFI courses are offered at levels from A to D, with each level completed with an examination.

Students can enter each level, based on a placement assessment. SFI courses are flexible and can combine with studies and work programmes.

Civil societies also play a role in advancing the education of immigrants through the provision of Swedish courses. The civil society study associations and folk high schools provide two types of courses aimed at asylum seekers in the early period of arrival. These courses are mainly done in two types of study circles, Swedish from day 1 and Everyday Swedish with the intention to introduce immigrants to Swedish and be able to enter the Swedish for foreigners (SFI) programme. The Swedish National Council of Adult Education, who is tasked by the government to distribute funds, mandates this help from the civil society. That being said, experiences of learning the language through participation in SFI differ. For some, it offered a useful way to learn Swedish. For others, the experience is negative with complaints that the SFI both took too long and its lessons were not divided into different levels of competence, for example as a young person who learns much faster than older participants, or that university educated are grouped with those who are illiterate.

### **Main Problems and Challenges**

Despite the efforts to provide education for asylum seekers, refugees and those under international protection, there are still challenges. For some, Sweden has not been able to actively provide integrated education. This is evidenced in the fact that Sweden still ranks among the worst countries among the OECD countries when it comes to performance of asylum seekers (OECD, 2016) as immigrants, more than non-immigrants are five times more likely to repeat a grade. This problem is further exacerbated by the problem of segregation. Segregation is also a challenge that affects equal access to education. This segregation is prominent in the divide in accommodation and socio-economic factors. For instance, The SNAE concludes that in schools with a larger proportion of students with a favourable socioeconomic background, the results tend to be higher than for students with less favourable conditions (Denkelaar 2018, see also: Skolverket 2012 chapter 6, Skolverket 2016). And since refugees tend to reside in suburban areas and areas where schools have lower academic standards, this invariably impacts their participation and education outcomes overall (UNHCR 2019b).

Another challenge is the mental well-being of immigrants. Students of high school age while initially motivated to learn, lose such motivation upon receiving a negative decision on their asylum application. This ends up being very distressing and disproportionately harmful, impacting their education. Additionally, there is the challenge of learning a new language. Learning a new language is hard, and Swedish as a language is especially difficult for migrants. This difficulty is made more pronounced when viewed in relation to the educational structure, or personal struggles. One of such personal struggles especially in regard to attending SFI has been the reason that immigrants, while often living with only fellow immigrants, do not come into contact with Swedish speakers on a daily basis. Moreover, there is a lack of information or knowledge about their rights among some asylum seekers and refugees, which hampers their access to their education.

## **UNITED KINGDOM<sup>31</sup>**

### **Legal and Institutional Framework**

In the UK, it is compulsory for all children in the age group 5-16 to attend school full-time, irrespective of their immigration status (Asylum Information Database 2019: 72; UK Government

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<sup>31</sup> Atto, N., Hirst, C. and Hall, V. (2020, July 14). Integration Policies, Practices and Experiences – United Kingdom Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3945509>



2018: 12). The local authority holds the responsibility to provide this education for free (Bates 2016: 15; Coram Children's Legal Centre 2017). Although asylum seekers, refugees and other immigrant children, in principle, have the same access to schooling as local children, financial difficulties may be a barrier. For example, children from families relying on Section 4 support are not allowed free school meals (Asylum Immigration Database 2018: 72-3). The UK has a modern system of education that includes nursery, primary, secondary and tertiary education (colleges and universities (UK Department of Education 2018: 3, 6). Access to free early childhood education and care differs between the four devolved legislatures in the UK. In England, all children aged three and four are able to access 570 hours (15 hours per week for 38 weeks) of free early education or childcare annually (Coram Children's Legal Centre 2017; Poulter et al. 2018: 11). This is extended to the age of two for children in families receiving certain kinds of benefits, including some types of asylum seeker benefits (Coram Children's Legal Centre, 2017; Poulter et. al., 2018: 11).

There are no obligatory classes for adult refugees and asylum seekers. That being said, a proficiency of English is instrumental in the integration process. In order to receive UK citizenship, it is necessary to pass the 'Life in the UK' test and demonstrate English language proficiency. Furthermore, recipients of Jobseeker's Allowance and Universal Credit must undertake language classes if their English skills are found to be below a certain level, in order to continue receiving payments (Foster and Bolton 2018: 7).

The UK government provides the policies and legislature; however, regional and local authorities have variances in implementing these. Non-Governmental Organizations play an important role by often filling in the gaps in the provision of language education as part of their efforts to successfully integrate immigrants.

## **Main Trends**

There is variation across the UK as to how well teachers and other school staffs are equipped to meet the specific needs of refugee children. The National Union of Teachers covers England and Wales and gives the mandate of adequate training to local councils and NGOs. This creates a discrepancy in the training of teachers, leading to uneven outcomes (All Party Parliamentary Group on Refugees 2017: 38). That being said, there has been a growing number of resources for teachers are becoming available, including the National Union of Teachers' online hub and the Welcoming Refugee Children to Your School guide (All Party Parliamentary Group on Refugees 2017: 38).

While refugees, asylum seekers, and holders of humanitarian protection and asylum can all pursue higher education, their fee status and ability to access finance differ according to immigration status (Asylum Information Database 2019: 73). The exception being if a limitation on higher education is stipulated in a particular asylum seekers' bail conditions (Asylum Information Database 2019: 72). Refugees, however, can access higher education in the UK on the same basis as British citizens. This means being charged domestic fees and can take out student loans. Holders of humanitarian protection have to wait three years before they can access student finance, and access domestic fee rates (All Party Parliamentary Group on Refugees 2017: 32). Asylum seekers however, are not eligible for student loans and are generally charged with the rate of international students, making it near impossible to pursue higher education (Asylum Information Database 2019: 73). An exception is Scotland, where both asylum seekers under the age of 25 and the children of asylum seekers can qualify as domestic students if they meet various residency criteria (Asylum Information Database 2019: 73).

The educational process is closely linked to several contextual and individual factors. For interviewed stakeholders and asylum seekers and refugees, education is a recurring anxious issue. Education in this regard is often presented as a 'mediating' factor, rather than as an

independent concern. This is because education is framed as either a 'symptom' of another problem (socio-economic), such as lack of access to the labour market, or indicative of difficulties within broader UK governmental policy. Two, education is also represented as a 'causal' factor – contributing to other, larger issues. This results in a cyclical phenomenon, where the inability to properly integrate into the broader society (at any level) is due to the multiple problems of language barriers, which in turn results in the lack of access to education facilities offering language-learning classes and resources.

There is also a generational difference in accessing educational resources; education is often spoken of differently in reference to children as opposed to adult asylum seekers and refugees. In relation to formal and informal educational opportunities, there is a distinction between asylum seekers and refugee adults and children. While children have access to formal schooling (even without citizenship), adults often experience greater difficulties in finding any form of structured education. This generational access to education paves the way for the transformation of family structures, and thus, norms and values.

### **Main Problems and Challenges**

The general challenge is the lack of language skills. This lack of language skills makes it more difficult to access educational systems. As mentioned earlier, education has been discussed as a mediating factor, and a symptom/indicative of difficulties within the broader UK governmental policies. This makes the lack of language to pose a 'catch-22' as asylum seekers, not migrants with refugee status, find themselves limited in their ability to access socio-economic opportunities, which in turn inhibits their chances of pursuing and learning the language.

There is also the challenge of economic and structural factors. To adults most importantly, their educational possibilities within the UK are frequently hampered by both economic and structural factors. These factors, often derived from impacts of the flawed governmental policy and provisions, forces them to either seek alternative expensive education from the private sector or stay with the inadequate governmental classes.

There is also the challenge of the changing process of the asylum process. This is especially evident in cases where the asylum-seeking process takes a long time. Thus, children who have been in the UK for several years, but not granted asylum status find themselves in full-time education as children, but unable to access such education once they become legal adults.

### 3.2. Summative Table – Education Policies and Integration

Country	Governance model	Main actors	Main trends in Education	Main obstacles and challenges
Austria	Hybrid due to the Federal System	<ul style="list-style-type: none"> <li>Federal Government (Austrian Integration Fund (ÖIF))</li> <li>Religious institutions</li> </ul>	<ul style="list-style-type: none"> <li>Integration classes provide structure during asylum application.</li> <li>Inclusion of religious education.</li> </ul>	<ul style="list-style-type: none"> <li>Expressed scepticism about ÖIF programme.</li> <li>Federal government illusion about the long process of integration.</li> <li>Confusion about courses and their providers.</li> </ul>
Germany	Hybrid due to the Federal System	<ul style="list-style-type: none"> <li>State</li> <li>Regional and local authorities</li> <li>NGOs</li> <li>CSOs</li> <li>Co-ethnic networks (relatives, friends, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Most recent policy issues have centred on educational inequality and “inclusion” of pupils with specific demands.</li> <li>Universities themselves have taken action by introducing special measures for the integration of refugee students.</li> <li>A certain determination to learn can be observed, particularly for women refugees who seem to complete higher levels of formal language learning.</li> </ul>	<ul style="list-style-type: none"> <li>The problem of not having the means or even the time to learn the host country language.</li> <li>Refugees often live in remote accommodation centres where connectivity is difficult.</li> <li>Issue of documentation not being approved or recognised by the German educational boards or higher education institutions.</li> <li>Teachers and volunteers are often not well equipped to teach their lessons.</li> <li>Placing refugees in remote and low populated areas with little contact with the local people impedes effective language learning and social integration in general.</li> </ul>
Greece	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>Government</li> <li>Non-governmental Organization (e.g. Lesvos Solidarity)</li> <li>Civil Society (e.g. Learning for Education Project)</li> <li>Municipalities (e.g. Athens Open Schools)</li> </ul>	<ul style="list-style-type: none"> <li>Formal education for children by the State, Reception classes (DYEP, Intercultural classes).</li> <li>Informal education for adults provided by civil society and NGOs.</li> </ul>	<ul style="list-style-type: none"> <li>Language barrier.</li> <li>NGO capacity shortages in providing informal education.</li> <li>Greek structural deficiencies impeding the educational system.</li> <li>Protests from local Greek population.</li> <li>Sub-par educational staff.</li> </ul>
Iraq	Fragmented, Region-based differences between the Central state and Kurdistan Region of Iraq (KRI)	<ul style="list-style-type: none"> <li>Government</li> <li>The Kurdistan Region of Iraq (KRI)</li> <li>I/NGOs (e.g. Save the Children, UNESCO, International Rescue Committee, SPARK, the British Council)</li> <li>Refugees acting as teachers (Syrian refugees in camp schools)</li> </ul>	<ul style="list-style-type: none"> <li>The enrolment rate in camp schools has reached 71% compared to 46% outside the camps (MERI, 2019).</li> <li>Although the number of schools has increased, the classroom situation is strained due to overcrowded classes.</li> <li>The percentage of students admitted to universities in the KRI is low, due to limited places and limited budget.</li> </ul>	<ul style="list-style-type: none"> <li>Difficulty obtaining educational certificates from previous schools in the home country is a barrier.</li> <li>Girls face cultural challenges going to schools, in addition to physical barriers.</li> <li>Economic hardships increase the chances of dropping out of school and taking up child labour.</li> <li>There is a lack of funding from donor countries and international organizations in providing material and technical assistance.</li> </ul>
Italy	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>Government</li> <li>Municipalities</li> <li>Ministry of Public Education</li> <li>Provincial centres for adult education and training (CPIAs)</li> <li>Civil Society Associations (e.g. Anelli mancanti)</li> </ul>	<ul style="list-style-type: none"> <li>Equal rights and responsibilities in terms of access to the Italian education system.</li> <li>Implementation of individualised/group initiatives in order to work towards the integration of refugee pupils.</li> </ul>	<ul style="list-style-type: none"> <li>Linguistic and social barriers.</li> <li>The CPIAs courses do not have adequate standards.</li> <li>Lack of adequate financial resources in the context of the integration of beneficiaries of international protection into the education systems.</li> </ul>

			<ul style="list-style-type: none"> <li>Guidelines by the Minister of Public Education suggest an integration of non-Italian students into regular classes to avoid a separation of the pupils.</li> </ul>	
Poland	Hybrid, fragmented (after the communist regime still transforming)	<ul style="list-style-type: none"> <li>The state</li> <li>Ministry of National Education</li> <li>Local government</li> <li>Cross-cultural assistants</li> <li>NGOs (e.g. Polish Migration Forum Foundation, Foundation Ocalenie, Polish Humanitarian Action)</li> </ul>	<ul style="list-style-type: none"> <li>Between 2014 and 2017, schools were obliged to implement anti-discrimination activities, however, this provision was abolished in 2017.</li> <li>After coming to power in 2015, the Law and Justice party suspended AMIF funding for NGOs.</li> <li>The limitation of EU funding opportunities for schools led to the cutting of projects aimed at integration.</li> <li>Anti-immigration/anti-refugee sentiments in society were strengthened, which also resulted in changed curricula with anti-discriminatory curriculum being removed.</li> </ul>	<ul style="list-style-type: none"> <li>NGO collaboration with local and central governments is very complex.</li> <li>Polish lessons take place at times when refugees work and in areas far from their residences.</li> <li>Polish language courses are inadequate and ineffective.</li> <li>Insufficient funding for schools with immigrant children and lack of methodological support for instructors.</li> <li>Difficulties due to lack of documentation from the home country with regards to education, qualifications and diplomas.</li> </ul>
Sweden	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>The State</li> <li>Municipalities</li> <li>School Administrative Bodies.</li> <li>Swedish National Agency for Education (SNAE)</li> <li>Civil Societies (e.g. Swedish National Council of Adult Education)</li> </ul>	<ul style="list-style-type: none"> <li>Formal education for children.</li> <li>Establishment of preparatory and mother-tongue schools for children.</li> <li>"Sprint" and "Start-up" courses in larger cities (Stockholm and Malmö)</li> <li>Integration and language training for Adults (Swedish for Immigrants (SFI))</li> </ul>	<ul style="list-style-type: none"> <li>Persistent difficulties in migrant integration into the society.</li> <li>Segregation of education according to socio-economic factors.</li> <li>Poor mental well-being of migrant students.</li> <li>The difficulty in learning Swedish.</li> <li>Lack of knowledge of migrant rights.</li> </ul>
Turkey	Neoliberal governance (for the labour market) but also centralist approach	<ul style="list-style-type: none"> <li>The Government (Ministry of Education)</li> <li>Provincial and Municipalities</li> <li>Non-Governmental Organizations</li> <li>EU (Provision of funding for Project for Promoting the Integration of Syrian Children in the Turkish Education System (PICES))</li> </ul>	<ul style="list-style-type: none"> <li>High educational gap between Syrians and Turks.</li> <li>Gender imbalance in access to education.</li> <li>High value of education by Syrian families.</li> <li>More highly educated and literate migrants are more likely to stick with the classes and show improvement.</li> </ul>	<ul style="list-style-type: none"> <li>Language barrier.</li> <li>Child labour hinders children's education.</li> <li>Daytime classes for adults are incompatible with working hours.</li> <li>Difficulty in finding appropriate documentation to access higher education.</li> <li>Lack of knowledge of the educational system.</li> <li>Sometimes older students are put into the same classrooms with younger students leading to academic and social problems.</li> </ul>
UK	Fragmented between levels of government (horizontal) and within levels of government (vertical)	<ul style="list-style-type: none"> <li>UK government</li> <li>Regional and local authorities</li> <li>Non-Governmental Organization (e.g. Syrian Sisters, Red Cross, Govan Community Project)</li> </ul>	<ul style="list-style-type: none"> <li>Variances in teachers training across States.</li> <li>Variances in access to higher education depending on immigration status (asylum seekers, refugees and people under international protection).</li> <li>Interplay of contextual (socio-economic) and individualistic (adult/children) in access to education.</li> </ul>	<ul style="list-style-type: none"> <li>Lack of language skills.</li> <li>Inverse impact of the asylum process on education.</li> <li>Impediment of economic and structural factors in accessing education.</li> </ul>

## 4. Housing and Spatial Integration

This section provides an overview of the legal and policy framework of housing and spatial integration of asylum seekers and refugees based on the macro section of the country reports of Austria, Germany, Greece, Iraq, Italy, Poland, Sweden, Turkey and the UK.

Housing remains a key feature of structural integration. Asylum seekers and refugees' access to housing depends on a variety of factors. While central governments often play some role in shaping the legal and policy framework for access to housing, they work in tandem with regional and local authorities, with local and international NGOs, and with the private sector when need be. Thus, the central actors are local and national governments, state agencies (operating at national, regional and local levels), local actors, NGOs and private enterprises.

The housing of asylum seekers and refugees either falls under shorter temporary accommodations like reception centres or hotspot facilities or under long term housing facilities often sponsored by the government in conjunction with actors mandated by the country. Personal networks play a significant role in the ease of finding accommodation. When asylum seekers and refugees have a choice of accommodation in the host country, their choice is influenced by socio-economic and religious factors, such as opportunities in the labour market, educational facilities, access to good infrastructure, security or even religious institutions.

Asylum seekers, refugees and beneficiaries alike in the discussed host countries face more or less similar challenges in terms of housing, including lack of mobility across various areas, lack of affordable and quality housing, congested living situations, risk of being short-changed by unscrupulous “brokers” who take advantage of asylum seekers’ restricted access to the housing market, discrimination from landlords, isolation from not being able to fully integrate into their host countries, or the problem of ghettoization as migrants end up forming clusters with little interaction with members of the host country.

### 4.1. Country cases

#### AUSTRIA<sup>32</sup>

##### Legal and Institutional Framework

Asylum seekers and refugees’ access to housing in Austria involves several aspects, such as the accessibility to different parts of the housing market (Vienna or Austria's rural areas), availability of affordable decent housing, personal preferences and the economic status of households. The federal government plays a role in asylum seekers and refugees’ housing, as they work to mitigate some of these aspects. Austria’s federal government sets no restrictions on the spatial distribution of international beneficiaries. Housing for both asylum seekers and refugees are aided by the Basic Welfare Support. Vienna, the capital of Austria is characterized by a strong social housing component that is only accessible after two years of permanent residence at the same address (Josipovic and Reeger, 2020: 42), a criterion that can hardly ever be met by refugees.

While the federal government plays some role in housing by not placing restrictions on where asylum seekers and refugees can live, the most instrumental actors are the provincial bodies, municipalities, civil society and most importantly, NGOs (e.g. Caritas, Volkshilfe, Red Cross,

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<sup>32</sup> Josipovic, I. and Reeger, U. (2020, June 17). Integration Policies, Practices and Experiences – Austria Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3898430>

Diakonie) who run accommodation centres in partnership with Fonds Soziales Wien (FSW) (Ibid.: 39). Vienna Social Fund (FSW) is responsible for quality assurance of accommodation centres. In addition to quality assurance in Vienna, in the reception phase, the FSW carries out specific measures for asylum seekers and organises accommodation in reception centres or housing subsidies for those living in private accommodation.

### **Main Trends**

Once asylum applicants have been formally recognized, they are distributed to federal provinces in accordance with an allocation quota based on availability of free places in accommodations and the number of inhabitants in the province. Basic Welfare Support generally provides aid (cash or in-kind allowances) to asylum seekers. Similar support is provided to recognised refugees (first four months upon approval) and beneficiaries of subsidiary protection depending on their need; however, those with private earnings are generally excluded from this (Josipovic and Reeger, 2020). With this assistance, asylum seekers may also choose to move to private flats, though a majority of the Basic Welfare Support remain in organized accommodations. While asylum seekers and refugees would like the opportunity to live in Vienna because of the infrastructure and leisure opportunities, they end up in the rural areas because Vienna has stricter access to the housing market (Ibid.:44).

### **Main Problems and Challenges**

Although the federal government passed a constitutional law authorizing the establishment of reception facilities in municipalities, the national government has imposed residence restrictions for asylum seekers who are now required to remain in the federal provinces that provide their basic welfare (Josipovic and Reeger, 2020: 39). Refugees attempting to enter the housing market face various challenges. Even those successful in finding an apartment, due to dire economic situations, often find themselves in flats too small for them and their families. Family and community networks play a key role in easing the search for housing (Ibid.:45)

The Austrian report shows that in general, asylum seekers, refugees and beneficiaries alike experience many challenges in finding adequate housing in Austria, especially in Vienna. During the interviews, participants often conveyed hopelessness, loneliness and uselessness due to the lengthy waiting time on their asylum application and their prolonged stay in organized housing facilities; in some cases three or more years (Ibid.: 41). The interviewees mention problems of overcrowding, lack of privacy, a noisy atmosphere and other difficulties related to accommodation. These challenges are exacerbated by the labour market ban and the lack of social contacts and interactions (Ibid.). One of the obstacles to securing an apartment in a social housing scheme is that applicants must have spent two years residing at the same address in Vienna. Compared to rural areas, it is more difficult to find an apartment in urban areas, and there is also a clear correlation between the economic situation, getting a job and finding a suitable apartment in Austria (Ibid.: 42-43). As described earlier, while personal connections with friends and relatives play a crucial role in finding an apartment successfully, the absence of personal connections can be a major downside to others at the same time. Several participants have encountered discrimination when trying to find accommodation and the landlords' propensity not to rent out to refugees is a major challenge for them. Even after locating an apartment successfully, because of their dire economic condition, recognized refugees often find themselves in flats too expensive and too small for them and their families (Ibid.: 44).



## GERMANY<sup>33</sup>

### Legal and Institutional Framework

In Germany, the procedures for providing accommodation to refugees are defined by the Asylum Act. The actors involved in providing accommodation span from regional states, municipalities, provinces and civil societies to private enterprises. Under section 56 of the Asylum Act, upon crossing the German border, asylum applicants, are subject to registration and assigned to a reception centre. They are obligated to stay in the reception centre in their assigned district, mandated from the Federal Office for Migration and Refugees (BAMF) branch office of the regional state, for a maximum period of six months (Chemin and Nagel 2020: 45) . In addition to the reception centres, there are “transit centres” or “special arrival centres” that combine both reception and deportation facilities where asylum seekers can stay for up to two years (Ibid.: 45). According to the Federal Office of accommodation centres and sections 48 and 53 of the Asylum Act, asylum seekers' obligation to stay in these centres end when they are granted asylum status. However, residence in the accommodation centre can be prolonged if no alternative housing space is available. Asylum seekers are housed in two types of accommodation; centralized and decentralized housing. The type of housing in which a refugee resides plays an important role in their access to integration in society.

### Main Trends

Centralized accommodation refers to the reception centres, arrival centres and so-called AnKER institutions, i.e. “Centres for Arrival, Decision making, Return”. Initially developed as a coalition between the Christian and the Social Democrats in 2018, in theory, AnKER-Centres combine different aspects of the reception procedure in one institution to speed up the decision-making process. In addition, they maintain control over the applicants and enforce deportation. Families with minors stay for a maximum of six months, and other applicants up to 18 months (Chemin and Nagel 2020: 45). Besides the bigger Arrival and Reception Centres, there are several smaller accommodation centres, many of which are run by municipalities and subcontracted to welfare associations or (sometimes) private enterprises. The detrimental impact of AnKER-Centres lies in “residence obligation”, which allows asylum applicants to leave the centre itself, but not the respective city or municipality without permission (Schader et al 2018: 94 in Ibid.: 45). Some of these centres of arrival are isolated from the wider community. Limited access to education and job opportunities, coupled with lack of mobility, have impeded the ability of asylum seekers to integrate into society as a whole and could lead to stigmatization and re-traumatization (Ibid.). A policy paper of the Network for Reception Management and Counsel for Asylum Seekers in Lower Saxony recommended housing for refugees in decentral accommodation. The paper called upon municipalities to make decentralized accommodation flanked with appropriate measures of community organizing. The preferred alternative in comparison to central accommodation would be decentralized housing in combination with intensive social outreach (Hess and Elle 2018: 38 in Ibid.: 46).

In reality, access to adequate and affordable housing remains difficult, especially in light of the free housing market and the social housing crisis. Therefore, refugees who do not have their own source of income have to compete directly with other welfare recipients, and those with their own income compete with anyone else in the free housing market (Ibid.: 47); resulting in a tense situation. In terms of reception and integration, refugees gain the most from decentralized

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<sup>33</sup> Chemin, J.E. and Nagel, A.K. (2020, June 3). Integration Policies, Practices and Experiences – Germany Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3874426>

accommodation, but the tense housing situation makes it very difficult for them to access affordable housing.

### **Main Problems and Challenges**

Although social workers assist refugees in finding private accommodation, there are still numerous obstacles. Some of these obstacles include: the exploitation of asylum seekers by 'brokers' who charge substantial money for relocation, insufficient funds for paying deposits, lack of necessary documents for a contract, and stigmatization of asylum seekers by landlords who choose not to rent to them. However, the autonomy and self-reliance that asylum seekers get from choosing and furnishing their own homes help them integrate more into society, provide valuable experiences and make them feel more at home (Chemin and Nagel 2020: 52). Usually, centralized refugee housing is associated with highly controlled settings which are located in isolated areas in some instances (Ibid.: 52). In this situation, geography becomes critical as geographic isolation hinders the capacity of refugees to have convenient access to services and society at large.

## **GREECE<sup>34</sup>**

### **Legal and Institutional Framework**

The narratives of asylum seekers and refugees regarding housing conditions largely differ according to the type of housing and accommodation in which they reside. Greece's housing policies have always been marginal in comparison to other European countries. There exists no social housing policy; housing and accommodation policies in Greece differ for asylum seekers and recognized beneficiaries of international protection (Emmanuel, 2006 in Leivaditi et al., 2020: 44).

The actors for asylum seekers and refugees' housing in Greece are the State, EU and NGOs. International Organizations such as IOM and UNHCR are the main actors and predominate in implementing housing policy for asylum seekers and beneficiaries of international protection.

### **Main Trends**

Accommodation for asylum seekers (while their application is processed) and refugees differ. In Greece, there are three different official accommodation provisions for asylum seekers: hotspots established in the North-eastern Aegean islands as centres for reception and identification; camps as temporary accommodation centres in mainland Greece and accommodation and housing in urban apartments and buildings (Papatzani et al., 2020). In addition, there is emergency housing, such as the projects FILOXENIA ("Temporary Shelter and Protection for the Most Vulnerable Migrants in Greece") and ESTIA ("Emergency Support to Integration and Accommodation Program"). As a decongestion programme for the relocation of large numbers of people from hotspots to camps and hotels on the mainland, FILOXENIA was implemented by IOM for a specific period of time. (Ibid.). Despite these programmes, there have been reported cases of asylum seekers renting their own accommodations and engaging in squatting in abandoned buildings or spaces (Leivaditi et al., 2020: 50)

While there is no substantial policy for refugees' housing, there are programmes implemented by international and non-governmental organizations to facilitate integration such as "Hellenic Integration Support for Beneficiaries of International Protection" (HELIOS), and "Curbing the

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<sup>34</sup> Leivaditi, N., Papatzani, E., Ilias, A. and Petracou, E. (2020, June 9). Integration Policies, Practices and Experiences – Greece Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3886993>

Limbo". Both programmes aim at providing housing among other immigrant related services such as capacity building.

The Greek reception system is characterized by a lack of long-term solutions and funding that is still centred on emergency assistance from the EU, thereby reducing the long-term viability of key programmes. Programmes such as "Emergency Support to Integration and Accommodation Programme" (ESTIA) are steps in a positive direction in terms of spatial distribution of beneficiaries in the urban space. However, forced cohabitation in ESTIA apartments are reported. Frequently two or three families are housed together within the same apartment (Ibid.: 48). The integration activities targeting ESTIA beneficiaries are considered to be inadequate to facilitate the holistic integration of recipients into the host society (Kourachanis, 2018 in Ibid.: 49).

### **Main Problems and Challenges**

The integration process for both asylum seekers and refugees largely differ, depending on individual experiences. Most asylum seekers housed in camps and hotspots report difficulty in integrating and developing closer interethnic relationships, due to problems of long distances between camps and the nearest cities, the lack of frequent and adequate public transportation and the lack of frequent communication with Greeks. On the other hand, squatters who live in abandoned buildings in the central neighbourhoods of Athens have been able to bridge gaps in interethnic relationships with the locals (Leivaditi et al., 2020: 50). In general, intense social conditions sometimes contribute to xenophobic tensions and racist attacks.

Specific challenges exist also in the private rental market, such as instances where owners decline to rent their properties to refugees because of xenophobic and racist prejudices. In addition, the rental prices of apartments in the cities are increasing due to the rise of the short-term rental market such as Airbnb, making it incredibly hard for refugees to locate affordable housing (Balampanidis et al., 2019 in Ibid.: 50).

## **IRAQ<sup>35</sup>**

### **Legal and Institutional Framework**

There is no specific legislation for the housing of refugees and IDPs in Iraq. That being said, housing of Syrian refugees is distributed geographically in most cities of Iraq, with a concentrated effort in the Kurdistan region of Iraq. The continued inflow of refugees since 2012 has led to the establishment of a camp in the West of Iraq, the border town of Al-Qaem between Iraq and Syria, within the Al-Anbar governorate. It was then expanded into three nearby camps (MOMD, 2013 in Warda and Almafraji, 2020: 36). There is relative freedom in the choice of housing in the Kurdistan region, in which asylum seekers or refugees are able to choose where to live and reside following safety checks on their legal status and obtaining residence permits (Ibid.: 41). This freedom of residency and the required security checks is related to the Ministry of the Interior in Baghdad and its organization of residency for asylum seekers and refugees. In other parts of Iraq, determining the place of residence is carried out in accordance with the provisions of Refugee Law 51 of 1971, and that requires the approval of the Minister of the Interior. A change of the place of residence requires that the Ministry of the Interior is informed (Ibid.: 41).

The provision of housing is a joint effort of the Federal Government in cooperation with International Organizations like the UNHCR. Together they provide, maintain and ensure housing to refugees and IDPs. The Kurdistan Regional Government takes a main role in establishing

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<sup>35</sup> Warda, W.K. and Almafraji, H.S. (2020, September 8). Integration Policies, Practices and Experiences – Iraq Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4019804>

permanent camps in the regions (Gawekosk, Qushtapa, Basirma, Darashakran). The government then cooperates with International Organizations such as the UNHCR to help people with special status who are refugees outside the camps to pay their rent. This cooperation further extends to helping to adapt their legal status, such as residency documents and facilitating official transactions (AL-Jubouri, 2015 in Warda and Almafraqji, 2020: 40).

### **Main Trends**

Housing remains a major concern for most of the Syrian refugees living outside the camps. Ethnic and religious belonging is one of the most important factors affecting the place of residence of the refugees. Syrians of Kurdish origin sought to reach the Kurdistan region and reside in Duhok or Erbil and Sulaymaniyah. Sunni Arabs favoured the Sunni populated areas in the western areas of Iraq (Anbar province). Assyrian Christians from Syria took refuge in Iraqi Christian villages and towns in Duhok, such as Bakhtami, Badarash, Babilo, etc. and the town of Ankawa in Erbil. The presence of friends and family, the availability of basic facilities, assistance and employment opportunities, as well as the overall economic situation of a city, are factors that also influence the choice of accommodation (Warda and Almafraqji, 2020: 36).

Security also played an important role in determining the place of residence for refugees, especially when requesting to move from camps to urban or rural areas, with the aim of getting work or being unable to cope with the conditions in the camps. To facilitate this, the government passed a resolution granting Syrian refugees the right to leave the camps after they complain of poor conditions (Al-Nasrawi, 2012 in Ibid.: 39). The decision stipulates the sponsorship of a citizen from the governorate for a refugee or family wishing to leave the camps (Warda, Al Mafraqji and Khorshid, 2020). In the Kurdistan Region of Iraq, an asylum seeker can live anywhere in the region after obtaining a residence permit, which requires the submission of a number of documents, including the form issued by the United Nations, housing endorsement from the neighbourhood mayor, Personal Identification Card, passport and family book (Ishtar TV, 2014 in Warda and Almafraqji, 2020: 39). But when the refugee wants to live in areas outside the region, other types of approvals from the Federal Government are needed.

The freedom to move and work for Syrians outside the camps provides opportunities to integrate into the host society. This open policy, pursued by the Kurdistan Regional Government in Iraq, towards the Syrian asylum seekers had a clear impact on the issue of integration for many of them as they are able to support themselves and their families without losing their identity and status. This freedom is clearly something that has not been provided all across countries and this assistance, while not being financial has been extremely important (UNHCR, 2018 in Ibid.:39).

### **Main Problems and Challenges**

Despite the open policy, there are still problems of isolation among refugees living in the camps, as those in the camps rarely mix with the local population (Warda and Almafraqji, 2020: 39), so there are fewer opportunities for their integration compared to those who live outside the camps and have the opportunity to interact with the local population on a daily basis.

## ITALY<sup>36</sup>

### Legal and Institutional Framework

The foundation of asylum seekers and refugees' housing resides in Article 47(2) of the constitution: affirmed by constitutional court decision No. 217/1998, which recognizes housing as a fundamental right. The right to housing is extended to foreigners on the basis of Article 3 and Article 117 of the Constitution, which clarifies migrant and asylum migration. Housing falls under regulations addressing short-term asylum procedures and long-term social housing.

Among the actors (the State, regions, autonomous provinces, local authorities and public-private ventures), the State remains the main actor with exclusive legislative jurisdiction in matters of migration and right to asylum and legal status of non-EU citizens (Ibrido and Marchese, 2020: 35). Local and regional authorities provide competencies in social welfare and housing. This situation gives rise to a multilevel legislative structure marked by major regional regulatory differences (Ibid.: 43) and housing policies to reflect both national and sub-national interventions and durational goals. In support of the State, there are public-private sector cooperations and some religious institutions (e.g. Caritas, Waldensian Church, Community of Sant'Egidio) who help by providing support, either through intervention in migration governance and advocacy or through providing accommodation to migrants and organising humanitarian corridors (Ibid.)

### Main Trends

The short-term housing regulations fall under “Regional hub” policy and “Hotspot approach policy”. Regional hubs were set up with the intent to progressively replace already existing centres of reception (CDAs and CARAs). Regional hubs handle short-term accommodation and asylum procedures and exist as identification centres and asylum applicant registration centres. They are also responsible for assessment of health conditions conducted as part of governmental first line reception facilities (Ibrido and Marchese, 2020: 36). The Hotspots approach is defined as a series of measures outlined in the Italian Roadmap 2015, and are centres of fingerprinting and receiving information on international protection, relocation and assisted voluntary return. These short-term housing policies have significant consequences. The regional hubs policy has not been fully implemented and there are problems of overcrowding and sub-par services (Ibid.: 37). The hotspots facilities also exist as a de facto-detention for several weeks (Ibid.: 38). Both policies result in overcrowding. Information processing backlogs have led to isolation and ghettoization as migrants are unable to interact and integrate with the wider Italian society.

Long-term social housing is regulated by Article 40(6) of the consolidated Act on Immigration guaranteeing access to public housing. Immigrants with a residence permit with a validity of at least two years, and engaged in regular or self-employment are on equal footing with Italian citizens to public housing and intermediation services of any social establishment by regional or local authorities to ease access to housing. Despite these regulations, the absence of systematic effective integration policies have resulted in a widespread recourse to informal settlements among immigrants (Ibid.: 42).

Asylum seekers stay in first aid and reception centres, such as the “extraordinary reception centres” (CASS) and CARAs for a long time and because of overcrowding and low service standards, they face critical situations. Sometimes these conditions can be compared to detention centres. Asylum seekers are accommodated in small decentralized facilities in second-line SPRAR-SIPROIMI<sup>37</sup> facilities where they are entitled to long-term support and integration services

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<sup>36</sup> Ibrido, R. and Marchese, C. (2020, June 15). Integration Policies, Practices and Experiences– Italy Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3894103>

<sup>37</sup> SPRAR-SIPROIMI: Service of Protection for Asylum Seekers and Political Refugees



(Ibrido and Marchese, 2020: 37). However, the places in the SPRAR-SIPROIMI network are not adequate to meet the needs.

For unaccompanied minors, the local municipality in which she/he was first traced is legally responsible. Accommodation of minors with unrelated adults is legally prohibited, although in practice this prohibition is not always complied with (Ibid.: 43). Under Legislative Decree No. 142/2015 and Law No. 47/2017, unaccompanied children should be given immediate accommodation in dedicated reception facilities.<sup>38</sup> For asylum seekers with special needs, Legislative Decree No 142/2015 lays down special provisions. Another provision for the reception and spatial integration of vulnerable subjects is Article 18 of the Consolidated Immigration Act, which ensures a special residence permit by public authorities. In the case of women who are victims of human trafficking and prostitution, the same provision is used and they are introduced into particular programmes (ibid.: 41).

### **Main Problems and Challenges**

Living conditions are far from being harmonized within hotspots: migrants receive little healthcare in some of these facilities and have poor sanitary and hygienic conditions (Ibrido and Marchese, 2020: 38). Interviews with asylum seekers and refugees showed the effect of ghettoization resulting from accommodation in military compounds and large-scale centres where safety is a major concern, especially with regard to women and children (Ibid.: 39). There is a problematic trend where the first reception and emergency facilities become permanent for asylum seekers (Ibid.: 37). It is also not appropriate for the prefectures to monitor and at the same time assess the quality of the reception system when they provide services. This was a concern expressed by stakeholders.

There are allegations that children are accommodated for prolonged periods in nonstandard, unsuitable reception centres, also with unrelated adults and in detention like hotspots (Ibid.: 43). In the case of unaccompanied children, an equal geographic dispersion of dedicated centres across the country is lacking. There are no specific provisions for LGBTQ+ asylum seekers and refugees to regulate their accommodation (Ibid.: 41). As mentioned earlier, regional authorities have important competencies in the context of migrant housing while the State has exclusive legislative jurisdiction in immigration, asylum and legal status matters. It would be advisable to introduce extensive monitoring of reception centres, entrusted to a third party and to develop a “widespread hospitality” model.<sup>39</sup>

## **POLAND<sup>40</sup>**

### **Legal and Institutional Framework**

The housing of asylum seekers and refugees involves a myriad of Laws and Articles. During their asylum procedures, asylum-seekers can either be accommodated in one of the available residence (stay) centres for foreigners or live outside centres. This choice is mandated in accordance with Art. 83 of the Law on Protection in conjunction with Art. 74. Furthermore, the 1997 Constitution stipulates in Art. 52(1) that: ‘Everyone shall be guaranteed freedom of movement in the territory of the Republic of Poland and the choice of place of residence and stay’.

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<sup>38</sup> Arranged by the Ministry of the Interior with funds from the Asylum Migration and Integration Fund (AMIF).

<sup>39</sup> A model in which small accommodation centres and families provide hospitality to migrants.

<sup>40</sup> Sobczak-Szelc, K., Pachocka, M., Pędziwiatr, K. and Szałańska, J. (2020, August 30). Integration Policies, Practices and Experiences – Poland Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4008666>



Polish Law does not differ in its legislation regarding housing for immigrants, which include refugees and beneficiaries of international protection. To increase space for this choice, two main laws are instrumental: The Law on Tenancy and Housing and the Law of Housing Allowance. The Law on Tenancy and Housing regulates the principles and forms of protection of tenants' rights and principles of managing the housing resources of the commune. It also indicates among others, the rights and obligations of owners and locators of flats and defines the housing resources of the communes and the rules of the rent of social subsidized housing (consolidated text, Journal of Laws 2020, item 611 in Sobczak-Szelc et al. 2020: 88). The Law of Housing Allowances lays down the rules and procedures for the grant, the determination of the amount and allocation of the housing benefits and the roles of the authorities in these matters (Consolidated text, Journal of Laws 2019, item 2133 in Ibid.: 88-89). Despite these laws, the rights of refugees for accessing housing are limited in terms of property rights. They must obtain permission from the Ministry of Interior and Administration if they wish to purchase land or a house (Koss-Goryszewska, 2019, p. 28 in Ibid.: 89). Although the state does not offer preferential access to housing for refugees, a kind of housing support in the form of housing counselling is offered as part of the integration activities under the Law on Social Assistance.

Housing policies for asylum seekers and refugees are implemented both by governmental and non-governmental actors. The governmental section is through legislation and local authority projects such as WITEK – 'Warsaw test project of integration of foreigners with regard to the needs of the labour market'. It was initiated and coordinated by the Office of Assistance and Social Projects of the Capital City of Warsaw. These governmental efforts are supplemented by significant input from non-governmental organizations, such as Halina Nieć Legal Aid Centre, Helsinki Foundation for Human Rights, Association for Legal Intervention, and others who take various measures to improve refugees' access to adequate housing (Ibid.: 94).

### **Main Trends**

There is a lack of adequate and affordable rooms, flats and houses as most refugees tend to settle in bigger cities to access the bigger labour market, and, as such, face the limitations of difficulty finding housing and high rental costs (Sobczak-Szelc et al. 2020: 98-99). Additionally, immigrants have to contend with the housing policies (such as the limits to property rights), which can hinder access to housing.

### **Main Problems and Challenges**

The challenges facing refugees in terms of access to housing and its impact on their health and eventual integration have been the biggest obstacle. The prevalence of discrimination in the housing market, which typically stems from anti-refugee and anti-Muslim prejudices, is another obstacle faced by refugees. These prejudices are mobilised and used within the political (Legut and Pędziwiatr, 2018; Pędziwiatr, 2017 in Sobczak-Szelc et al. 2020: 93) and social (Zick et al., 2011 in Ibid.: 93) spheres and ultimately affect refugees' access to housing and integration as most Polish people believe that integration of refugees (especially Muslims) is not feasible. In addition to these challenges, there has been a lack of specialized accommodation counseling for international protection beneficiaries and, ultimately, the threat of homelessness is faced by some asylum seekers and refugees when the administrative assistance offered under the IIPs ends (Koss-Goryszewska, 2019 in Ibid.: 90).

These challenges alone pose serious problems to the integration of refugees into society. They weigh on the physical and mental wellbeing of migrants as they navigate their new homes, hence affecting their settlement. The most important effect of these challenges to integration is the location of the refugee centres and the flats and houses that they live in.

## SWEDEN<sup>41</sup>

### Legal and Institutional Framework

The Swedish Migration Agency (SMA) is responsible for asylum seekers' accommodation up until they receive a residence permit, after that the municipalities take over the main responsibility. In terms of housing, from the time of arrival up to the point of decision, there are two main alternatives for newcomers: to live in accommodation provided by the SMA (at a reception centre or in apartments, called ABO) or to live in private accommodation (called EBO) that one arranges for oneself, which often means staying with relatives or friends already living in the country. An asylum seeker living in accommodation provided by the SMA, will then be placed somewhere in the country without the possibility of choosing the location, upon receiving a positive decision on her/his asylum case. New legislation was introduced in 2016 through the Settlement Act (2016:38)<sup>42</sup> when EBO and other factors contributed to the situation that far more immigrants were received by some municipalities than others (Cetrez et al., 2020: 44). This new legislation mandates the government to have a shared quota among municipalities for even distribution among different municipalities while taking into account the municipality's labour market conditions, population size, total reception of newcomers, unaccompanied children and the number of asylum seekers staying in the municipality, in order to ensure geographic dispersal of refugees (Ibid.: 44). However, new amendments have been introduced which came into force on 1 January 2020, imposing further restrictions on EBO housing arrangements (Barthoma et al. 2020: 25). The overall housing crisis of Sweden and the lack of affordable housing constitutes a real challenge in the settlement process of asylum seekers and refugees.

The main actors in housing include the central government, SMA, municipalities, County Administrative Boards, social office, refugees and their ethnic and familial networks as autonomous entities. The division of responsibilities was formed among different authorities through the introduction of LMA (Lag 1994:137)<sup>43</sup>. As a national authority, the Swedish Migration Agency (SMA) is responsible for asylum seekers during their asylum process, while local municipalities are responsible for those with residence permits.

### Main Trends

The experiences of asylum seekers and refugees are diverse; especially their place of living has a remarkable impact on their experiences. The majority of asylum seekers and refugees are drawn to urban areas such as Stockholm, Gothenburg and Malmö, as bigger cities provide better access to infrastructure, better job opportunities, better social prospects, and ultimately easier integration into the Swedish society as a whole (Cetrez et al., 2020: 99). This route however, is met with the consequences of lack of housing, the risk of black-market housing fraud and the possibility of segregation as most end up living with other immigrants as neighbours, hence contributing to an 'immigrant bubble' and increasing the chances of ghettoization, while decreasing integration with Swedish society (Ibid.: 49-51). The rural dimension also accrues its own benefits and downsides. A move to the rural area allows for support from the municipality, however slighted with the notion of Syrian refugee primacy. The downsides of rural accommodation have been the issues of helplessness, deprivation of not having all their needs met, isolation from lack of access to services like transportation, education, job and even socialization (Ibid.).

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<sup>41</sup> Rottmann, S.B.. (2020, May 30). Integration Policies, Practices and Experiences – Turkey Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3865824>

<sup>42</sup> Lag (2016:38) om mottagande av vissa nyanlända invandrare för bosättning.

<sup>43</sup> Lag (1994:137) om mottagande av asylsökande m.fl.

## Main Problems and Challenges

The housing issue has been compounded by the fact that Sweden is facing a general housing crisis, but it especially affects low-income individuals such as newly arrived immigrants. About 83% of Sweden's municipalities reported a shortage of housing in 2019, with a specific deficit in available rental apartments, according to the National Board of Housing, Building and Planning (Boverket)<sup>44</sup>. Newcomers with other numerous obstacles may find it extremely challenging to find housing. In addition, Sweden's private housing sector was accused of profiting from the status of immigrants by renting out low-quality housing at unsustainable and excessive prices (Barthoma et al. 2020: 26). Municipalities began receiving a much higher number of new refugees with the introduction of the Settlement Act and found themselves arranging housing for a much greater number of people than their capacity. Furthermore, there are no clear guidelines in the Settlement Act (2016:38) with respect to type of accommodation, conditions, duration of rental contracts, costs and so on. As a consequence, the implementation of the Settlement Act varies in different municipalities, widening inequalities. Instability, uncertainty and temporary housing contracts often create tremendous psychological pressure and tension on the part of refugees and put an additional toll often aggravating circumstances for single mothers and people with serious health conditions (Cetrez et al., 2020: 54). Inadequate, intolerable, congested and undignified conditions of accommodation can lead to frustration, humiliation, stress, loss of a sense of belonging and a negative view of society, jeopardizing the overall process of integration, which is sometimes the case for asylum seekers and refugees in Sweden (Barthoma et al. 2020).

## TURKEY<sup>45</sup>

### Legal and Institutional Framework

Housing of asylum seekers and refugees is regulated in Article 95 of the Law on Foreigners and International Protection (LFIP). The regulation does not specify any provision or obligation of the government for providing state housing. Under Article 95 of LFIP, immigrants are required to arrange their own accommodation. However, section two (2) of Article 95 of LFIP does authorize the Directorate General for Migration Management (DGMM) to set up "Reception and Accommodation Centres". As of October 2019, there were only 7 centres in 5 cities (Adana, Kilis, Kahramanmaraş, Hatay, and Osmaniye). The majority of Syrians are not encamped, live in private accommodations, predominantly in big cities (Rottmann, 2020: 48)

As the government does not specify nor is obligated to provide state housing (Ibid.: 48), asylum seekers and refugees themselves are the main actors, given their responsibility to find their own housing. Directorate General for Migration Management (DGMM) is responsible for "Reception and Accommodation Centres".

### Main Trends

As the main actors, refugees and asylum seekers choose their own accommodation, which is dependent on multiple factors. Family relations and job opportunities are two major factors influencing their choice of residence, and the importance of ethnic connections is another factor determining their choice (Rottmann, 2020: 50-51). The familiarity of physical landscape may bring

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<sup>44</sup><https://www.boverket.se/sv/samhallsplanering/bostadsmarknad/bostadsmarknaden/bostadsmarknadsenkaten/>

<sup>45</sup> Rottmann, S.B. (2020, May 30). Integration Policies, Practices and Experiences – Turkey Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3865824>

a sense of comfort to refugees and asylum seekers and influences their decisions to reside in some cities.

### **Main Problems and Challenges**

The biggest challenge for refugees is related to the travel restrictions within Turkey with many reporting problems acquiring a travel permit (Rottmann, 2020: 52) from the Provincial Directorate of Migration Management (PDMM) in their province. This limitation in movement has exacerbated feelings of loss and upheaval as they remain separated from their family members in other cities in Turkey. Another challenge has been the sense of insecurity that refugees and asylum seekers face in finding housing and living in filthy and substandard houses. They also have to face the challenge of higher costs of housing. Despite the difficulties faced in accessing quality housing, refugees have come up with ways to make themselves comfortable and at home. Finding a good neighbourhood and help from neighbours (Kaya 2016; 2017; Rottmann and Kaya 2020 in Rottmann, 2020) help in decreasing their experienced difficulties in society. That being said, asylum seekers and refugees have chosen to live in particular areas of the city because of discrimination elsewhere. As a consequence, some recent reports (TEPAV 2019 in Ibid.: 53) mention the formation of ghettos in Istanbul and, naturally, ghettos can have adverse consequences.

## **UNITED KINGDOM<sup>46</sup>**

### **Legal and Institutional Framework**

Asylum seekers and refugees' housing in the UK is categorized separately. Depending on their status, they are eligible for specific housing. For asylum seekers, the UK Government employs a dispersal policy and ensures that eligible asylum seekers under the Section 95 housing support are moved to local authorities (Wales, Scotland, the North, Midlands and South West of England) who have agreed to the programme (All Party Parliamentary Group on Refugees, 2017: 20; Asylum Information Database, 2019: 68 in Atto et al., 2020: 54). The eligibility of asylum seekers to specific housing is decided by the Home Office and management of the accommodation is contracted to three companies and their subsequent sub-contractors. The dispersal policy means that asylum seekers do not have a say in where they are relocated and largely remain passive in the process. Although asylum seekers are meant to be moved out of reception centres within 19 days, shortages of dispersal accommodations have resulted in longer staying periods (Asylum Information Database, 2019 in Atto et al., 2020: 54)

Refugees are resettled under the Vulnerable Persons Resettlement Scheme (VPRS) and placed with a participating local authority. VPRS refugees who are appointed to a community sponsorship group instead of a council are an exception (Home Office, 2018: 8 in Atto et al., 2020: 54). The first group has no choice about which local authority they are placed with; however, their assessed needs are taken into consideration in the matching process. Scotland (2,599, 17%), Yorkshire and the Humber (1,721, 12%) and the West Midlands (1,445, 10%) were the regions which received the most resettled refugees (Home Office, 2019 in Ibid.: 54). Coventry (462, 3%), Birmingham (346, 2%) and Belfast (335, 2%) were the largest receiving local authorities (Home Office, 2019 in Ibid.: 54). Once asylum seekers have been granted refugee status, they have 28 days before they are removed from the asylum support system (All Party Parliamentary Group on Refugees, 2017: 19). Once granted refugee status, refugees can access public housing on the same basis as British citizens or apply for an integration loan from the government towards

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<sup>46</sup> Atto, N., Hirst, C. and Hall, V. (2020, July 14). Integration Policies, Practices and Experiences – United Kingdom Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3945509>

providing their own accommodation. The main actors involved in the housing process are the State (UK government), public-private collaborations and non-state actors, such as family members of immigrants and community networks.

### **Main Trends**

Currently, there are eight dispersal accommodation centres in the UK. The most common type of dispersal accommodation is private housing that is managed by private contractors. Public-private cooperation and privatization of housing are driven by profit, have a direct effect on housing provisions and are responsible for inadequate housing conditions (Atto et al., 2020: 56). Nuclear families are usually housed together, while individuals are put in shared accommodation. It is worth noting that the vast majority of asylum seekers are housed in the poorest part (Lyons and Duncan, 2017 in Ibid.: 54) of the country and numerous accounts of dispersal accommodation report failures to meet basic safety, hygiene and privacy standards (Asylum Information Database, 2019: 69 in Ibid.: 54).

### **Main Problems and Challenges**

Immigrants have expressed difficulties in integrating into their allocated housing environments, their local communities, as well as with the policy-based barriers to changing housing and/or region(s) of habitation. Immigrants with families already resettled in the UK report a much easier time navigating the whole housing and integration process. The community at large has a significant impact on immigrants' integration, and respondents who have encountered friendly neighbours and communities expressed better integration and well-being than those who have not had such cordial relations with neighbours (Atto et al., 2020)

Structural accommodation barriers are one of the most immediate and persistent challenges faced by asylum seekers and refugees as they enter and try to settle in the UK (Ibid.: 56). Lack of housing or lack of access to housing and inadequate housing conditions are structural problems, resulting from existing policy in this field. When asylum seekers obtain their refugee status, often they get evicted and end up being homeless, creating disparity between asylum seekers' and refugees' entitlements (Ibid.: 56-57). Some refugees characterize their transition from asylum seeker to refugee status as extremely difficult largely owing to housing problems, suggesting that they had better housing facilities during the asylum phase. The path to refugee status also indicates discrepancy in housing access and assistance. People are not allowed much during the asylum process, and are made passive, as if they have to be thankful for whatever is provided to them (Ibid.: 66), which is likely to cause disintegration. If the asylum seekers are given refugee status in the United Kingdom, they are expected to adjust in the society rapidly though people are not fully prepared. Housing policy and practice do not consider the background and communal issues of asylum seekers that sometimes lead to troubling situations. Asylum seekers and refugees sometimes characterise their relationship with their neighbours as 'unfriendly' and have a sense that they are 'unwanted.' Furthermore, the so-called 'queue-jumping' or presumed preferences granted to asylum seekers and refugees over UK citizens sometimes leads to a situation of political sensitivity in the local community (Ibid.: 57).



## 4.2. Summative Table – Housing

Country	Governance model	Main actors	Main trends	Main barriers and challenges
Austria	Hybrid due to the Federal System	<ul style="list-style-type: none"> <li>Federal government</li> <li>Provincial Bodies</li> <li>Municipalities</li> <li>Civil Societies</li> <li>NGOs (e.g. Caritas, Volkshilfe, Red Cross)</li> </ul>	<ul style="list-style-type: none"> <li>Refugees are distributed to federal provinces in accordance with an allocation quota.</li> <li>Stricter access to the housing market in Vienna for asylum seekers and refugees.</li> <li>Asylum seekers and refugees end up in rural areas.</li> </ul>	<ul style="list-style-type: none"> <li>Difficulties in finding adequate housing.</li> <li>Overcrowded accommodation.</li> <li>Federal restrictions on accommodation.</li> <li>Lack of contacts and interactions.</li> <li>Prolonged stay in organized housing facilities cause hopelessness, loneliness, uselessness.</li> </ul>
Germany	Hybrid due to the Federal System	<ul style="list-style-type: none"> <li>Regional authorities</li> <li>Municipalities</li> <li>Provinces</li> <li>Civil societies</li> <li>Private enterprises</li> </ul>	<ul style="list-style-type: none"> <li>Housing both centralized and decentralized.</li> <li>Development of so-called <i>AnKER institutions</i>, i.e. "Centres for Arrival, Decision making, Return"</li> <li>Highly controlled environments in Centralized housing.</li> <li>Imposed geographical limitations on freedom of movement</li> </ul>	<ul style="list-style-type: none"> <li>Lack of access to education and work opportunities in remote housing areas.</li> <li>Tense situation in free housing market</li> <li>Overall crisis of social housing</li> <li>Exploitation of migrants by "brokers"</li> </ul>
Greece	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>State</li> <li>EU</li> <li>NGOs</li> <li>International Organizations (IOM and UNHCR)</li> </ul>	<ul style="list-style-type: none"> <li>Funding centred on emergency assistance from the EU</li> <li>Establishment of Hotspots in the North-eastern Aegean Islands as centres for reception and identification</li> <li>Use of camps as temporary accommodation centres in the mainland.</li> <li>Implementation of emergency housing projects, such as FILOXENIA and ESTIA.</li> </ul>	<ul style="list-style-type: none"> <li>Difficulty in integrating and developing closer interethnic relationships due to problems of long distances between camps and nearest cities.</li> <li>Owners not willing to rent their properties to refugees because of xenophobic and racist prejudices</li> <li>High housing rental prices.</li> <li>Lack of long-term housing and rise of the short-term rental market such as Airbnb</li> <li>Engagement in squatting in abandoned buildings or spaces.</li> </ul>
Iraq	Fragmented, Regional governance (Central state and Kurdistan Regional Government)	<ul style="list-style-type: none"> <li>Federal Government</li> <li>Regional governments (such as KRG)</li> <li>International Organizations (such as UNHCR)</li> </ul>	<ul style="list-style-type: none"> <li>No specific legislation for the housing of refugees and IDPs in Iraq.</li> <li>Housing of Syrian refugees is distributed geographically, with concentrated effort in the KRG region.</li> <li>Choice of housing dependent on religious background, security, and job opportunities.</li> </ul>	<ul style="list-style-type: none"> <li>Isolation</li> <li>Security risks</li> <li>Freedom of movement limited in certain regions.</li> <li>Fewer opportunities to integrate for those living in camps compared to others who interact daily with the local population.</li> </ul>
Italy	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>State</li> <li>Regional authorities</li> <li>Local authorities</li> <li>Religious institutions (e.g. Caritas, Waldensian Church, Community of Sant'Egidio)</li> <li>Public-private ventures</li> </ul>	<ul style="list-style-type: none"> <li>A problematic trend where the first reception and emergency facilities become permanent for asylum seekers.</li> <li>Significant differences among regional regulations and housing policies</li> <li>Short-term housing regulations such as "Regional hub" policy and "Hotspot approach policy".</li> </ul>	<ul style="list-style-type: none"> <li>Overcrowding and sub-par services in Regional Hub.</li> <li>De Facto-detention for several weeks in hotspots</li> <li>No specific provisions for LGBTQ asylum seekers and refugees to regulate their accommodation.</li> <li>Children are accommodated for prolonged periods in nonstandard, unsuitable reception centres, also with unrelated adults and in detention-like hotspots</li> <li>Critical situations faced in first aid and reception centres because of overcrowding and low service standards.</li> </ul>



			<ul style="list-style-type: none"> <li>• Informal settlements among immigrants due to the absence of systematic effective integration policies.</li> </ul>	
Poland	Hybrid, fragmented (after the communist regime still transforming)	<ul style="list-style-type: none"> <li>• State (Ministry of Interior and Administration)</li> <li>• NGOs</li> <li>• Local authorities</li> </ul>	<ul style="list-style-type: none"> <li>• Increasing anti-refugee and anti-Muslim prejudices used within the political and social spheres that affect refugees' access to housing and integration.</li> <li>• Housing policies aim at limiting property rights of refugees.</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of adequate and affordable housing.</li> <li>• Discrimination and prejudice against asylum seekers and refugees.</li> <li>• The threat of homelessness after the end of institutional support</li> </ul>
Sweden	Hybrid (both central and local)	<ul style="list-style-type: none"> <li>• Swedish Migration Agency (SMA)</li> <li>• Municipalities</li> <li>• County Administrative Boards</li> <li>• Social office</li> <li>• Autonomous entities (migrants, their friends and families)</li> </ul>	<ul style="list-style-type: none"> <li>• Restrictions on EBO housing arrangements.</li> <li>• Geographic dispersal of refugees</li> <li>• Segregation</li> <li>• Unequal housing experiences in different municipalities</li> </ul>	<ul style="list-style-type: none"> <li>• Swedish housing crisis and lack of affordable housing.</li> <li>• Unstable, uncertain, and temporary housing contracts.</li> <li>• Congested and undignified housing conditions.</li> <li>• Exploitation of refugees by private housing sector</li> <li>• No clear guidelines in the Settlement Act with respect to the type of accommodation, conditions, duration of rental contracts and costs.</li> <li>• Ghettoization in urban areas; Isolation in rural areas</li> </ul>
Turkey	Neoliberal governance (for the labour market) but also centralist approach	<ul style="list-style-type: none"> <li>• Asylum seekers and refugees</li> <li>• Directorate General for Migration Management (DGMM)</li> </ul>	<ul style="list-style-type: none"> <li>• No specific provision or obligation of the government to provide state housing to asylum seekers and refugees.</li> <li>• More restrictions on freedom of movement. Recently, registration in Istanbul as a place of residence has been stopped</li> <li>• The majority of Syrians are not encamped, and live predominantly in big cities.</li> </ul>	<ul style="list-style-type: none"> <li>• General feeling of insecurity due to insecure housing.</li> <li>• Tremendous difficulties in finding private housing</li> <li>• Dirty and substandard housing</li> <li>• Lack of mobility</li> <li>• Development of ghettos in Istanbul</li> <li>• Housing and living costs are higher for Syrian refugees, especially in Istanbul.</li> </ul>
UK	Fragmented between levels of government (horizontal) and within levels of government (vertical)	<ul style="list-style-type: none"> <li>• UK government</li> <li>• Public-private collaborations</li> <li>• Non-state actors (family and community networks)</li> </ul>	<ul style="list-style-type: none"> <li>• Dispersal policy</li> <li>• Privatization of housing</li> <li>• Restrictions on changing housing and/or region of habitation.</li> <li>• The vast majority of asylum seekers are housed in the poorest part of the country.</li> </ul>	<ul style="list-style-type: none"> <li>• Structural barriers (lack of affordable/quality housing)</li> <li>• Failure to meet basic safety, hygiene and privacy standards in dispersal accommodation.</li> <li>• Difficulties in integrating into allocated housing and with local communities.</li> <li>• Disparity between asylum seekers' and refugees' entitlements.</li> <li>• Refugees often get evicted and end up being homeless</li> </ul>

## 5. Psychosocial Health

This section provides an overview of the psychosocial determinants of health among asylum seekers and refugees in the integration process. Governments and state organizations in the form of a National Health Services often shoulder the bulk of providing healthcare to migrants, although this role is often buttressed with assistance from local authorities, NGOs, INGOs, Public-Private ventures, and Religious institutions when need or state legislature mandates it.

An overview of the health sector provides similar trends. There is a general discrepancy of the health of migrants on the basis of their legal status (asylum seeker or under international protection). This discrepancy extends to whether a migrant resides in a camp or not. There is also a trend of refugees experiencing trauma from the journey to the host country, as well as conflicts from the home country. Socio-economic stressors of being refugee (finding a job, worry of legal status, isolation from family and connections) play an important role in the degree of wellbeing of people. There is also the trend of a strain of healthcare services in host countries as a result of the influx of migrants. The role of religion varies according to institutions, individuals and even socio-political atmosphere. Religious institutions help ease the integration process and provide a community and sense of belonging for migrants. Individually, religion as a coping mechanism is relational and situational.

Asylum seekers and refugees face similar challenges of language and communication barriers, underdeveloped facilities and expertise for addressing trauma and psychological health, intercultural differences and discrimination.

### 5.1. Country cases

#### AUSTRIA<sup>47</sup>

##### Legal and Institutional Framework

Austria exceeds the minimum standard set by the European Union for the provision of a standard health care system to asylum seekers by allowing recognized refugees and asylum seekers alike free access to the health care system. After submission of an asylum application, applicants are granted a basic care, which includes medical care as well as basic dental treatment. Once a recognized refugee whose asylum application has been granted, the basic care provision is upgraded for a standard insurance card (e-card) and they become part of the insurance system as Austrian citizens (Kohlenberger, Buber-Ennser, Rengs, Leitner & Landesmann, 2019). Persons entitled to subsidiary protection, on the other hand do not receive an e-card unless employed in Austria, in that case the employer assumes responsibility for health insurance. Otherwise they receive, as do asylum seekers, a health insurance voucher that enables them to use services such as examinations and treatment. While asylum seekers are automatically exempt from prescription fees, recognized refugees can apply for exemption from prescription fees if their monthly income is below a certain limit.<sup>48</sup>

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<sup>47</sup> Josipovic, I. and Reeger, U. (2020, June 17). Integration Policies, Practices and Experiences – Austria Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3898430>

<sup>48</sup> Source: [https://www.wu.ac.at/fileadmin/wu/h/press/Presse\\_2019/190109\\_WU\\_Projektbroschuere\\_ReHIS.pdf](https://www.wu.ac.at/fileadmin/wu/h/press/Presse_2019/190109_WU_Projektbroschuere_ReHIS.pdf).

## Main trends

Regarding psychosocial health, there is an interplay of factors that influence the health of asylum applicants and recognized refugees. One of the most pressing factors is the stress of awaiting the decision for the legal status. Beneficiaries of international protection feel more secure, more positive and motivated to pursue future goals, while other asylum seekers devoid of international protection and kept in insecurity over a long period of time about their legal status are more prone to showing signs of despair and depressions.

Another factor influencing psychosocial health is the sense of community. The presence of family members and help received from new friends and acquaintances does improve and raise the wellbeing and quality of life. That being said, other psychosocial problems have been caused by the act of being an asylum seeker.

## Main Problems and Challenges

The biggest challenge to immigrant psychosocial health is the language barrier and a general lack of knowledge about the structure of the Austrian health care system. This results in a high number of visits to hospitals emergency units as opposed to a lower share of visits to the general practitioners and resident specialists (Kohlenberger et al. 2019). This huge overflow into the emergency units in turn poses a bureaucratic problem as hospitals complain of being hard pressed to find interpreters for the variances in languages they receive in the emergency units. In a bid to redress this issue, some Austrian hospitals and doctors have taken to using video interpretation to overcome the language barrier. Apart from the video translation from family members and friends, there exists professional services who offer translation per video at any hour. But this service is still insufficient owing to the high cost involved.

Exacerbating the language problem is the limited scope of what constitutes “trauma”. Psychological trauma arises from an array of factors: trauma from their country of origin, trauma from the journey to Europe, trauma from waiting for their legal status. All of these factors combined necessitate more psychological treatment that requires additional funding and expertise, both of which are still insufficient.

## GERMANY<sup>49</sup>

### Legal and Institutional Framework

It is mandatory to hold health insurance in Germany. The country’s health care system features a complex structure, with both, regional states as well as societal bodies, such as sickness funds, involved in it. There are two types of insurance in Germany: a state health insurance and a private health insurance, whereas both types work through contributions of employers and employees. For asylum seekers, the health insurance is provided by the responsible social welfare office (Busse et al. 2014: xxiv). Section 4 AsylbG states that asylum seekers are entitled for medical care in case of acute illness and pain; pregnancy and women in childbed are included in this definition. However, Section 6 AsylbG states that case-by-case decisions can be made when required by the individual medical conditions. For purposes of facilitating access to health care, the so-called electronic health card (“elektronische Gesundheitskarte”) was introduced in most of the regional states in Germany. However, the regular health system does not cover mental health care but treatment in this respect is almost entirely financed by Psychosocial Centres for Refugees and Victims of Torture (PSZ) (Wächter-Raquet 2016: 32). Once their

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<sup>49</sup> Chemin, J.E. and Nagel, A.K. (2020, June 3). Integration Policies, Practices and Experiences – Germany Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3874426>

asylum application has been granted or after 15 months after their arrival, asylum seekers are eligible for full health services (just like German welfare recipients) (ibid: 13-14).

### **Main trends**

Due to the traumatic experiences that many refugees have had to endure, psychological treatment plays a profound consideration when it comes to the question of health care of asylum seekers and refugees. With the introduction of the so-called “Protect-questionnaire”, the early detection of mental health issues are aimed at, and in case of a diagnosis, further measures are being undertaken. The Network for Traumatized Refugees in Lower Saxony (NTFN), for example, offers help in acute psychosocial crisis and assists with finding a long-term therapy place.<sup>50</sup> Furthermore, there are joint endeavours between municipalities and NGOs and local hospitals and individual psychotherapists.

Close ties to family and children as well as everyday activities signalling the desire for normality and a daily life routine, are indicated as sources of wellbeing and mechanisms of coping with the difficulties that accompany seeking refuge. Furthermore, confessional organizations/small congregations of local religious groups and volunteers have helped refugees to find some sort of psychosocial support through ritual and pastoral care as well as through various psychosocial services.

### **Main Problems and Challenges**

Oftentimes refugees refrain from seeking psychological help due to many hurdles. A general inaccessibility of information on where to find help, financially based fears and anxiety to approach psychological professionals, coupled with a barrier of communication represent some of the obstacles/barriers and challenges. Moreover, there is a general lack of (long-term) therapy places. In Germany, the long time between filing an asylum application and the decision on it, is often characterized by a period of isolation, idleness, powerlessness, boredom and the restriction of freedom of movement which all have negative effects on well-being. The dire housing situation in cramped camps, the distance to family and friends as well as negative confrontations about their religious practices can lead to deepening psychological symptoms. Additionally, there have been reports on negative experiences/personal abuses with/by officials such as e.g. clerks that have led to a deteriorating state of mental health. Long-term effects of untreated mental health issues are e.g. the outcomes of education and long-term unemployment (failing integration into the labour market), failing sociocultural integration through e.g. the wrong interpretation of mental challenges as “laziness” etc.

## **GREECE<sup>51</sup>**

### **Legal and Institutional Framework**

Greece’s healthcare system is a mixed model of both tax-based financing and social health insurance. The system has historically grappled with enduring structural and operational inadequacies that have not yet been addressed. The recent monetary crisis and the severe fiscal constraints crisis have further exacerbated the failure or stagnation of reforms (Economou et al. 2017). These pre-existing inadequacies within the Greece healthcare system translate to its

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<sup>50</sup> <https://www.ntfn.de> (accessed 13/05/2020).

<sup>51</sup> Leivaditi, N., Papatzani, E., Ilias, A. and Petracou, E. (2020, June 9). Integration Policies, Practices and Experiences – Greece Country Report (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3886993>

inability to address migrant health, despite the fact that the health system in Greece is considered as a universal coverage system.

Since 2016, the government has set up “PHILOS – Emergency health response to refugee crisis” as a parallel health care programme for refugees and migrants. The programme is supported by the Greek Ministry of Health and implemented by the National Organisation of Public Health. The programme exists to address the refugee crisis by attending to the sanitary and psychosocial needs of people living in reception centres by responding comprehensively to the urgent situation caused by the refugee crisis in mainland Greece (Attica, Northern and Central Greece) after the closure of the Greek-North Macedonia borders and the EU-Turkey Statement, which resulted in a large number of refugees being stranded in the country and living in open camps created by the Greek government.

Since 2017, PHILOS has expanded to the Reception and Identification Centres on the Eastern Aegean islands of Mytilene, Chios, Samos and the Dodecanese islands of Kos, Rhodes, Leros, and Kalymnos. Personnel are also distributed between seven health districts of the National Health System in mainland Greece, including the National Centre for Emergency Care. The PHILOS programme has also worked with NGO, resulting in projects like the PHILOS Project Médecins du Monde to provide somatic and mental health and psychosocial support network services in camp settings Médecins du Monde, in Athens and Thessaloniki.

### **Main trends**

Main trends refer to the general overview of the health system current situation and the health trajectory of migrants, and in the case of Greece is mostly structural. Despite a favourable legal framework, actual access to healthcare services is reportedly very complicated, owing to the structural deficiencies within the health care system. The public health sector has been severely affected by the Greece financial crisis and the resultant austerity measures, leading to huge pressure and lacks the capacity of the system to cover all needs for healthcare services, either local or migrants.

Aside from the general structural problems, there exist discrepancies between rural and urban refugees and their access to the limited healthcare. Refugees residing in major urban centres have better access to health care due to the presence of organized NGOs and the presence of large hospital structures (EPAPSY, 2020). Those living in the rural areas, or in camps do not get the same access to health care. When it comes to mental health, there exist no comprehensive systems for rehabilitation to support asylum applicants and refugees with trauma.

### **Main Problems and Challenges**

Language remains an important obstacle in accessing mental health services (MDM, 2018). Non-Greek speaking patients are virtually excluded from mental health services as most asylum seekers with mental health disorders are excluded from the National Referral System of Accommodation and municipal shelters due to their mental health condition (MDM, 2018). The National Referral System is funded by the Ministry of Health and is accessed by people by being hospitalized for a long time in a psychiatric clinic of a national hospital. These referrals are based by competent departments of the National Psychiatric Hospitals and depend on the availability and capacity of the aforementioned facilities (MDM, 2018). Thus, those who do not speak the Greek language and do not have residency permits are excluded from these accommodation facilities. Furthermore, several refugees and asylum seekers often mention having no access to interpreters during their appointments with doctors due to continuous funding constraints in appointments with doctors.

## IRAQ<sup>52</sup>

### Legal and Institutional Framework

Iraq's current healthcare system does not rest upon a legislature, but rather on an interlaced effort with contributions from the government, Non-governmental Organizations, and International Organizations. Such a system of healthcare must be understood within the context of the political, social and economic woes in the past decades. Historically, Iraq's health care system had been strong in terms of the availability of infrastructure, including hospitals, specialized medical centres, factories, and pharmaceutical companies. Even in spite of these historic structural efforts from the government, the country lacked the presence of professional and experienced medical staff, and this has only worsened in the last 25 years due to the economic sanctions imposed by the United Nations on Iraq in the period (1990-2003). In addition to the repercussions of the sanctions, the 1991 Gulf War further destroyed the urban health institutions. Further destruction of infrastructure and healthcare has ensued from the conflicts and violence experienced in the years after (2003-2011). And lastly, the threat and occupation of ISIS since 2014 has only deteriorated health services and infrastructure as many specialized medical and expert health staff has fled the affected regions (Nineveh, Anbar, Salahuddin, Baghdad and Iraqi Kurdistan). These extenuating conditions thus place the burden of access and provision of healthcare to existing hospitals, civil society organizations, operating NGOs in these areas, and the World Health Organization in conjunction with UNICEF.

### Main trends

Trends here refer to the general overview of healthcare in Iraq and among refugees and IDPs. Generally, refugees who reside in the urban areas have better access to state hospitals. Yet depending on the area that they reside, they may be faced with restrictions. For example, refugees face stricter restrictions related to their residence status if they go to the Centre or South of Iraq, while in other areas, they might get free access to health care. Despite this access to government health services, healthcare is limited and disproportionate to the scale of suffering. Opportunities for health care in the private sector does not arise too much as it is difficult to access and expensive when measured to the limited income of most refugees.

Health problems among refugees and IDPs living in the camps are more present compared to those living outside the camps. This is partly related to the problems of overcrowding in the camps, which allows for the spread of infectious diseases especially in the denser exclusive places (IOM – Iraq 2013). Therefore, there is the need for continuous evaluation for health conditions in these areas to prevent such outcomes.

Given the extenuating factors aforementioned, health centres in the camps provide only primary health services assisted by the World Health Organization, Medecins Sans Frontieres (MSF), UNICEF, and other international, local and national organizations. More recently, UNHCR oversees health care, and provides the camp population with a health insurance card with main health issues that are referred to local hospitals and pharmacies outside the camps. To address mental health problems, MSF teams have opened a health care centre in Bardarach camp which hosts 11 thousand Syrian refugees. MSF teams are also working to enhance rapid adaptation by providing residents with advice on how to take care of themselves and others and how to deal with psychological stress (MSF 2019).

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<sup>52</sup> Warda, W.K. and Almaffraji, H.S. (2020, September 8). Integration Policies, Practices and Experiences – Iraq Country Report (Version v.1). Zenodo. <https://doi.org/10.5281/zenodo.4019804>



## Main Problems and Challenges

The main challenge for accessing health care is the instability caused by conflict and its strain on health care system. Furthermore, efficiency and effectiveness of these institutions are affected by the economic and political problems that arise from time to time between the Kurdistan Regional Government and the Federal Government.

Perhaps, help from NGOs and INGOs may step in to keep healthcare services afloat, yet the strain is a challenge. For example, the World Health Organization says that providing healthcare to about 250.000 Syrian refugees in Iraq presents a great challenge to the local health authorities, WHO and other humanitarian organizations in Iraq, due to lack of resources resulting from the big internal displacement crisis in 2014. The instability also affected the coordinated efforts to ensure adequate services reaching the nine camps in the region (Syrian Observatory Human Rights, 2019).

## ITALY<sup>53</sup>

### Legal and Institutional Framework

When viewed from a comparative law perspective, the Italian legislation has one of the models most inclusive to migrants in their access and right to health care (Cerrina Feroni 2019, 19). This legislature is made up of various Articles, Court Decisions and Cassations, though the basis of migrants right to this healthcare resides in Article 32 of the Italian Constitution, which accords, “The Republic safeguards health as a fundamental right of the individual and as a collective interest and guarantees free medical care to the indigent.” This Article in addition with combined provisions of Articles 32, 2, 3 and 10 of the Constitution, the Constitutional Court clarifies the essential core of the right to health should encompass migrants too (ex multis, Decisions nos. 252/2001, 432/2005 306/2008). The edicts of these articles are further buttressed by the Supreme Court Cassations (Cassation Nos. 14500/2013 and 7615/2011) which stresses the importance of the right to health of foreigners, clarifying that the need for treatment precludes the enforcement of an expulsion order.

The Italian health care system is branched into two forms: The taxpayer funded Universal health care model which provides health care to anyone in need; and the private which has special relevance in the fields of ophthalmology and dentistry. Though, Articles 34 and 35 of Legislative Decree No. 286/1998 introduces a distinction between foreign nationals enrolled in the National Health Service and other foreign citizens. Foreign nationals in this case refer to foreign nationals with a regular residence permit, unaccompanied minors, asylum seekers and beneficiaries of international protection. They are required to register with the National Health Service and benefit from the National Service to the same degree as Italian citizens. Foreign citizens on the other hand are composed of other foreigners, irregular migrants in particular, and are eligible to receive essential or urgent outpatient and hospital treatment in public facilities. They are also eligible for prolonged treatment for diseases and injuries and they may also access programs of preventive medicine for the protection of the individual and collective health.

Mental problems are handled by the National Health System that provides specialised services to support migrants with mental problems. According to Article 1 of Legislative Decree No. 18/2014, which implements EU Directive 2011/95, the Ministry of Health must adopt guidelines concerning assistance and rehabilitation interventions, as well as the treatment of mental disorders of refugees and asylum seekers. Such guidelines were adopted in March 2017 and

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<sup>53</sup> Ibrido, R. and Marchese, C. (2020, June 15). Integration Policies, Practices and Experiences– Italy Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3894103>

attempted to harmonise the various approaches already taken in the national territory. Although the guidelines identify all refugees as a “vulnerable group”, they devote special attention to the needs of 2 vulnerable subgroups: women and minors (especially unaccompanied minors).

### **Main trends**

Given that some asylum seekers and refugees are victims of torture, inhuman or degrading treatment in their home country, during their journey or in the detention camps, the presence of serious mental and psychosocial problems is not uncommon among asylum seekers and refugees. As some of the interviewees said, after their arrival in Italy, their medical problems were especially related to their own psychological condition got worse rather than of a physical nature. Among asylum seekers and refugees, the most common health and mental problem have been symptoms potentially compatible with the so-called “exhausted migrant effect”.

### **Main Problems and challenges**

Despite migrants’ right to accessing healthcare and the broad services rendered by the Italian healthcare system, there are some challenges that hinder asylum seekers and refugees’ rights and access to healthcare. The most prominent of these challenges has been the language barrier. The Italian medical personnel usually only speak Italian, and this coupled with the lack of cultural mediators can hinder the essential mutual understanding between patient and health care worker. Furthermore, there are bureaucratic delays in the issuance of health care cards and renewal of residence permits, without which access to health care is made more difficult.

## **POLAND<sup>54</sup>**

### **Legal and Institutional Framework**

In theory, Polish law does not offer separate legislation regarding healthcare for foreigners, including refugees, and this stems from the 1997 Constitution which stipulates under Art. 68, a right of everyone to the protection of their health. Public authorities are further mandated to ensure special healthcare to children, pregnant women, handicapped people and persons of advanced age, thus indicating universal access to healthcare without distinguishing between citizens and foreigners. But in practice, access to healthcare is legislated differently depending on whether one is a refugee, foreigner or under international protection. The access to healthcare for asylum seekers is regulated differently than the same provision for persons with international protection (Pachocka et al. 2020). In this regard, apart from Article 68 of the Constitution, persons under international protection have two main laws that cover their access to healthcare. The first is the Article 74 of the Law on Protection, where social assistance and medical care is provided to a foreigner granted international protection two months from the date of delivery of his/final decision on the asylum application. This Law is further augmented by the Law on Healthcare Benefits, which is financed by the public and provides further access to healthcare. In this regard beneficiaries of international protection are generally subject to the same rules as residents of Poland. However, persons not covered under the Law on Healthcare Benefits have their health services provided in terms set out in separate provisions and international agreements (Art. 2(2)). In this case, asylum seekers, as the group not under international protection, have their health relegated to the Private Sectors.

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<sup>54</sup> Sobczak-Szelc, K., Pachocka, M., Pędziwiatr, K. and Szałańska, J. (2020, August 30). Integration Policies, Practices and Experiences – Poland Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4008666>

## Main trends

The trends in healthcare in Poland are based on the legal status of asylum seekers. As evidenced in the different legislature, the provision of health care services to beneficiaries of international protection is formally equal with the same services provided to other members of the Polish society while asylum seekers healthcare operates in a different sector. Asylum seeker medical services are provided by the private company Petra Medica, and when officially recognized and under international protection, they are moved to the general public health care system. This transition in health care providers has been deemed by interviewed migrants as difficult, problematic, and fraught with uncertainties. In this regard, this system is problematic because it sets different standards and access to healthcare among migrants. Thus, it is suggested that all refugees, not only persons under international protection be treated like citizens when it comes to healthcare provision (PLMZSO1). This system is also inefficient because it results in certain organizational and financial deficiencies. For example, at present, the cost of the medical care for persons in reception can be either overestimated or underestimated, given that it is a subject of agreement between the Office for Foreigners and the institution that wins the competition for provision of medical services to asylum seekers. Thus, if healthcare provisions for asylum seekers were made public and under supervision of the National Health Fund, such a situation should not occur. An additional benefit of such a change could be a smooth transition with health care provision from the reception phase to the integration phase, which at present remains highly problematic.

## Main Problems and Challenges

The challenges for accessing healthcare are abundant. The language barrier remains the biggest problem. The inability to communicate with the health providers coupled with the intercultural competences makes access to healthcare difficult. The general demarcations between asylum seekers also provide some structural challenges. For persons under international protection, there is the challenge of being short-changed and taken advantage of, as some agencies have taken to paying health insurance contributions to those who cannot do it themselves. This challenge arises from the fact that persons with international protection often lack knowledge of their rights in this respect. Other groups like asylum seekers, on the other hand have to contend with the general discrimination that comes with their access to healthcare.

Another challenge is the lack of specialized treatments for vulnerable persons. Poland lacks qualified psychologists and therapists that specialize in treating trauma, in particular in an intercultural context to victims of torture or traumatized asylum seekers. Even when assistance is provided from the non-governmental organizations, it is not sufficient to fill the systemic gaps such as lack of psychotherapy available under general healthcare provisions (AIDA, n.d; Szczepanik 2017).

## SWEDEN<sup>55</sup>

### Legal and Institutional Framework

The governance of the Swedish healthcare system is mainly regulated by the Health and Medical Services Act (Sweden 2020), the Patient Act, the Patient Safety Act, and the Patient Data Act (Region Stockholm 2020). The Swedish healthcare system is not centrally governed and the county administrative bodies and the municipalities share the responsibility for the different

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<sup>55</sup> Cetrez, O., DeMarinis, V., Pettersson, J. and Shakra, M. (2020, July 19). Integration Policies, Practices and Experiences – Sweden Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3951714>

aspects of the healthcare system together with county councils. The main national healthcare organisations are the National Board of Health and Welfare, the Swedish Association of Local Authorities and Regions and the Health Responsibility Board (Sweden, 2020) and the Public Health Authority of Sweden (PHAS). Additionally, the Swedish Red Cross society augments the provision of healthcare and in some cases provides information on health care services to immigrants (Röda Korset 2018).

When it comes to Asylum health, Sweden has a special act (lag 2008:344 om hälso- och sjukvård åt asylsökande) called the Act on Health and Emergency Care for Asylum Seekers that regulates the rights and access of the asylum seekers, beneficiaries of protection and certain other foreigners to the Swedish healthcare system. This act contains provisions about the region's obligations, in addition to what follows from the Health Care Act (2017: 30) and the Dental Care Act (1985: 125), to offer healthcare and dental care to asylum seekers, beneficiaries of protection and certain other foreigners. Asylum seekers are also entitled to the Swedish Communicable Diseases Act (SMA 2020g) that provides reproductive health care services such as abortion care, contraception, maternity and childbirth care. Undocumented migrants on the other hand, fall under regulatory Acts (2013:407, Government Bill 2012/13:109) that provides emergency care, somatic and psychiatric healthcare and dental care (Socialstyrelsen 2019).

Asylum seekers are entitled to emergency care, dental care, and healthcare that cannot be postponed as well as a health examination as soon as possible after their asylum application unless it is clearly unnecessary. Emergency and healthcare can be provided to them to a greater extent than required by law since it is up to each county council/region to decide which type of healthcare the asylum seeker can receive (Socialstyrelsen 2019).

## **Main trends**

Main trends here refer to the general overview of the health system current situation and the health trajectory of asylum seekers and refugees. By the end of 2015, Sweden received an influx of asylum seekers not seen since the Second World War, resulting in enormous pressure and strains on many central social functions – the healthcare system is one of those systems (Government Bill 2015/16:174, 3). Thus, the healthcare system became challenged in meeting the needs of the newcomers within a short period of time (Socialstyrelsen 2015, 7).

In general, the mental and somatic health condition of immigrants depends on a variety of factors: notably on their legal status, their experience in the home country, transit experience, experience (in the labour market, education, housing and the community) in the host country according to the patterns we have observed throughout this material.

Notably participants' mental health is remarkably connected with their legal status as it defines their access to different opportunities and services including the health service.

## **Main Problems and Challenges**

Challenges here refer not primarily to legal issues, but to the obstacles that migrants face accessing health care. In this regard, language has been one of the most hindering factors towards accessing healthcare. The challenge of language extends more than communication to include not only difficulties in communication, but also, the lack of interpretations that includes shortages of interpreters, lack of expertise, and difficulties in booking an interpreter. In cohorts with the lack of communication, cultural understanding and cultural competence are needed to build rapport. The lack thereof can lead to problematic misinterpretations between patients and healthcare professionals.

In addition, there is the problem of perceived discrimination, which breeds a lack of compassion by health caregivers, migrants' feelings of not being trusted, not given the needed medication or even being denied necessary care.

## **TURKEY<sup>56</sup>**

### **Legal and Institutional Framework**

Migrants who neither have a health insurance nor the financial means to pay for health care services are provided for by the General Health Insurance scheme under Turkey's public social security scheme (Kaya 2020a: 44). This also includes mental health services in public hospitals. However, access to health services is only provided in the provinces where the individuals are registered with the exception of emergency cases in which also non-registered individuals will receive treatment.

### **Main trends**

Due to communication problems, some migrants who can afford this financially seek treatment at private hospitals or at Syrian Health Centres which are located in areas with high numbers of refugees and are staffed with Arabic speaking personnel (Syrian and bilingual Turkish medical staff). These Centres offer care for basic medical needs for a small fee regardless of the legal status of the patients.

What could be detected is a general interplay between poor health, psychological impact of migration and little financial means. Thus, psychological stress can induce physical ill-health and vice versa. Accordingly, it is important that psychosocial services are provided, and IO and I/NGOs offer mental health services such as mobile teams making house visits.

### **Main Problems and Challenges**

In practice, accessing health care services has posed its difficulties for refugees. One of them is related to the identity card of refugees that is sometimes registered in a province different from the one where the person is currently living. This may be due to employment reasons (see also, Cloeters and Osseiran 2019: 14). As mentioned above, treatment can thus be limited to emergency care. Additionally, a small number of migrants do not have any ID card at all and thus are not eligible for free national health care. Refugees have also reported that they have experienced both, neither receiving proper attention for their ill-health condition, nor proper treatment as a consequence of what they identified as discrimination. Further obstacles are overcrowded state hospitals, feelings of being rushed through by the doctors and long waiting times. As mentioned above, one of the main barriers that has been detected is the difficulty of communication and not being able to express their discomfort/health issues properly. Another challenge is that there is no financial support for fertility treatment and prosthetics (for war victims). The number of female doctors available to refugees (female) is inadequate and pre-natal care needs improvement. In terms of mental health, there is a strong need for greater awareness of psychological ailments/symptoms and wider access to information on psychosocial support and available services.

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<sup>56</sup> Rottmann, S.B. (2020, May 30). Integration Policies, Practices and Experiences – Turkey Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3865824>



## UNITED KINGDOM<sup>57</sup>

### Legal and Institutional Framework

The healthcare of the UK is devolved to the National Health Service (NHS), and since its establishment in 1948, exists as an umbrella term for the UK's public funded health care systems from which includes: Northern Ireland, Scotland, England and Wales. Migrant access to healthcare in the UK is an extremely complicated issue with rules that are subject to frequent changes. Migrants' access to healthcare and the subsequent costs are charged depending on the type of service, the relevant devolved administration as well as the immigration status of the individual.

Every refugee in the UK has free access to the NHS, and asylum seekers with a current asylum claim can access healthcare through registration with the General practice although they face some difficulties in navigating the process (Asylum Information Database, 2019: 74). Refused asylum seekers with an outstanding application and in receipt of Section 95 or Section 4 support can still register with a General Practitioner albeit with some difficulty while unaccompanied minors are looked after by the local authority (Asylum Information Database, 2019: 74). That being said, every person in the UK, irrespective of immigration is able to access emergency and accident services, free GP services for primary health care, and treatment for specific diseases (Asylum Information Database, 2019: 75; UK Government, 2019).

The NHS is facing increasing pressure owing to a growing and an ageing population (Duncan and Jowitt 2018; Greer 2016: 18). This has resulted in significant workforce shortages, long waiting times of up to one year for non-emergency hospital services, financial deficits across the NHS (Anandaciva, et al. 2018; Duncan and Jowitt 2018). In 2018, public satisfaction with the NHS was 53%, a low level not being seen since 2007 (Robertson et. al. 2019). Fortunately, there has been no evidence to suggest that the influx of immigrants has exacerbated the situation (Matthews-King 2018).

For psychological health, treatment for torture and trauma victims is largely provided by the not-for-profit sector, with notable charities in this space including Freedom from Torture, the Helen Bamber Foundation and the Refugee Therapy Centre (Asylum Information Database 2019: 75). Although in principle undocumented migrants can access free primary mental health services, fear of engaging with professions linked to the government and denial of GP registration deter many from taking this route.

### Main trends

Main trends refer to the general overview of the health system and the health trajectory of migrants. Psychological health of asylum seekers and refugees is depending on a variety of factors, all of which fall under the stressors of navigating in a new country. Although legal policy and restricted healthcare affect all asylum seekers and refugees, the effects are not felt the same across all legal categories. There exists a clear discrepancy between asylum seeker and refugees in terms of emotional wellbeing, as well as notable divisions in emotional health between those in detention or those who have experienced detention. The biggest factor for these differences is the anxiety of legal status and its influence in navigating and building roots in a new country.

The socio-economic factors pose great determinants to the psychosocial wellbeing. The experiences and challenges of the language barrier plays a significant role in finding a job and navigating in the labour market, being abreast with government policies regarding employment,

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<sup>57</sup> Atto, N., Hirst, C. and Hall, V. (2020, July 14). Integration Policies, Practices and Experiences – United Kingdom Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3945509>



difficulties in finding housing, and access to healthcare. All which weigh on the wellbeing of immigrants. These factors sometimes invariably create secondary traumas that directly impact the outcomes of integration as immigrants are not able to fully integrate into their communities, and build roots in their new home.

Another factor among immigrants has been isolation and physical separation from family. It is explicitly linked with psychosocial health, wellbeing, and integration; but it is also simultaneously linked with other perceived difficulties, be it overtly or implicitly. These could include physical health, or more extended social problems – such as economic stability, access to work, and broader community.

### **Main Problems and Challenges**

Challenges here refer to the obstacles that immigrants face accessing health care. There are challenges to migrants' psychosocial wellbeing. The first challenge is the language barrier. This lack of adequate communication affects all facets of the wellbeing and integration of immigrants. The language barrier invariably contributes to difficulty in navigating the system, finding appropriate help, communicating with their health providers, finding jobs and ultimately building roots in the new home. Furthermore, there is a stigmatization of mental health issues in immigrant communities, which further enhances difficulties in navigating the system, and the unavailability of independent translators and the lack of a permanent address to receive correspondence are all key issues affecting access to mental health services (Fassil and Burnett 2015: 10-11).

Another challenge resides in the bureaucratic challenge as mental health services in the UK are subpar to the physical health services, and though providers try to cope with the increased demand for mental health services, it still exists shortages with the trained health care personnel (psychiatrists, nurses) dealing with mental health.

## 5.2. Summative Table – Health

Country	Governance model	Main actors	Main trends in Psychosocial Health	Main barriers and challenges
Austria	Hybrid due to the Federal System.	Federal provinces, NGOs (e.g. <i>Hemayat</i> ), Family and community networks.	<ul style="list-style-type: none"> <li>Stress from uncertainty of legal status.</li> <li>Beneficiaries of international protection feel more secure.</li> <li>Asylum seekers devoid of international protection are more prone to showing signs of despair and depressions.</li> <li>High number of visits in emergency units in hospitals and a lower share of visits to general practitioners and resident specialists.</li> </ul>	<ul style="list-style-type: none"> <li>Language barrier</li> <li>Lack of knowledge about the structure of the Austrian healthcare system.</li> <li>Stress from long asylum procedure.</li> <li>Wide scope of “trauma”.</li> </ul>
Germany	Hybrid due to the Federal System.	State, Municipalities, Private sector, NGOs, Religious Institutions.	<ul style="list-style-type: none"> <li>Limitations in terms of mental health care provision.</li> <li>Trauma among asylum seekers and refugees.</li> <li>Considerable demand for psychological treatment.</li> <li>Necessary but expensive treatment or therapies are not always covered by local authorities.</li> <li>Joint endeavours between municipalities and NGOs and local hospitals and individual psychotherapists.</li> </ul>	<ul style="list-style-type: none"> <li>Complex structure of healthcare system.</li> <li>Lack of information.</li> <li>Language barrier.</li> <li>Mental health issues remain untreated, in some cases for several years.</li> <li>Lack of (long term) therapy places.</li> <li>Negative experiences, personal abuses with/by officials.</li> </ul>
Greece	Hybrid (both central and local).	National Organisation of Public Health, Ministry of Health, PHILOS, NGOs (e.g. <i>Médecins du Monde</i> ).	<ul style="list-style-type: none"> <li>Further restrictions on the access to medical services as well as outpatient consultations especially on the Aegean Islands.</li> <li>Structural deficiencies due to financial crisis.</li> <li>Discrepancies between rural and urban access to limited healthcare.</li> <li>Attempts to reform the healthcare system often fail at the implementation phase.</li> </ul>	<ul style="list-style-type: none"> <li>Structural and operational inadequacies within the health system.</li> <li>Inadequate funding for the health system.</li> <li>Language and communication barriers.</li> <li>Asylum seekers suffer from depression and post-trauma disorders, leading to increasing suicide attempts and self-harm, including among young people.</li> </ul>
Iraq	Fragmented, Region-based differences between the Central state and Kurdistan Region of Iraq (KRI).	Government, Regional authorities, NGOs, INGOs (e.g. WHO, UNHCR, UNICEF, <i>Médecins Sans Frontières</i> )..	<ul style="list-style-type: none"> <li>Stricter restrictions to the Centre or South of Iraq, while in other areas refugees may get free access to health care.</li> <li>Deteriorating health services and infrastructure in recent decades.</li> <li>Differences in access to healthcare (urban vs. rural).</li> <li>Religion as a coping mechanism among refugees.</li> </ul>	<ul style="list-style-type: none"> <li>Political, social and economic instability.</li> <li>Strain on healthcare services.</li> <li>Healthcare is limited and disproportionate to the scale of suffering.</li> <li>Health centres in the camps provide only primary health services.</li> <li>Lack of coordinated efforts to ensure adequate health services in camps.</li> </ul>
Italy	Hybrid (both central and local)	The State,	<ul style="list-style-type: none"> <li>Development of one of the most inclusive models of migrant access to healthcare.</li> </ul>	<ul style="list-style-type: none"> <li>Lack of linguistic and intercultural competences of medical personnel.</li> </ul>

		<p>Regional and local authorities,</p> <p>The National Health System,</p> <p>NGOs (such as ASGI: the Association for Juridical Studies on Immigration),</p> <p>Religious institutions (e.g. Community of Sant'Egidio and the Waldesian church).</p>	<ul style="list-style-type: none"> <li>• Migrants show better health conditions than Italians in the period immediately after their arrival in Italy.</li> <li>• Serious mental and psychosocial problems are found among asylum seekers and refugees in Italy.</li> <li>• In terms of mental health, special attention given to the needs of 2 vulnerable subgroups: women and minors (especially unaccompanied minors).</li> </ul>	<ul style="list-style-type: none"> <li>• Too many visits to the emergency room and the inability to explain to medical personnel.</li> <li>• Bureaucratic delays in the issuance of health care cards.</li> <li>• Highest levels of misperception among citizens, especially about immigrants.</li> </ul>
Poland	Hybrid, fragmented (after the communist regime still transforming)	<p>State,</p> <p>Private sector (Petra Medica),</p> <p>NGOs,</p> <p>Religious organizations (e.g. the Volunteer Centre in Lublin, Community Sant'Egidio).</p>	<ul style="list-style-type: none"> <li>• Discrepancy in healthcare access between beneficiaries of international protection and asylum seekers.</li> <li>• Highly problematic transitions from reception to integration phase in terms of healthcare provision.</li> <li>• Low healthcare funding, insufficient and ageing medical manpower and poor infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>• Organizational and financial deficiencies due to different sets of standards and access to healthcare among immigrants.</li> <li>• Language barrier and cultural differences.</li> <li>• Structural challenges of access to healthcare (beneficiaries of international protection vs. asylum seekers).</li> <li>• Lack of qualified psychologists and therapists who specialize in treating trauma.</li> <li>• Significant levels of Islamophobia or anti-Muslim racism in the country.</li> </ul>
Sweden	Hybrid (both central and local)	<p>The county council (<i>Landsting/Region</i>),</p> <p>The county administrative bodies (<i>Länsstyrelserna</i>),</p> <p>The municipalities (<i>Kommunerna</i>),</p> <p>NGOs (Swedish Red Cross Society).</p>	<ul style="list-style-type: none"> <li>• Strain on healthcare system after refugee influx.</li> <li>• No uniform system of provision of healthcare services in Sweden for immigrants.</li> <li>• Legal status is noticeably connected with participants' mental health conditions.</li> <li>• Most devastated group in terms of psychosocial health is the asylum seekers at the deportation stage.</li> <li>• Women respond higher to PTSD and lower on resilience than men.</li> <li>• Religion, children, family, friends, success, associations, work are observed to be meaning-making systems among refugees and asylum seekers.</li> </ul>	<ul style="list-style-type: none"> <li>• Language barriers and lack of interpreters.</li> <li>• Lack of cultural understanding and competence.</li> <li>• Long distance to the healthcare centres from housing of Asylum seekers.</li> <li>• Lack of compassion by caregivers.</li> <li>• Sometimes, the time to get a diagnosis is very long, resulting in a deteriorating health condition.</li> <li>• Perceived discrimination.</li> </ul>
Turkey	Neoliberal governance (for the labour market) but also centralist approach	<p>Government,</p> <p>NGOs (e.g. Turkish Red Crescent, ASAM),</p> <p>INGOs (e.g. WHO)</p>	<ul style="list-style-type: none"> <li>• Rush in identifying problems and writing a prescription by doctors in state hospitals.</li> <li>• Cyclical relationship between physical and psychological health.</li> <li>• Socio-economic stressors found among refugees.</li> <li>• Half of the Syrian refugees think they or their family members need psychological support</li> </ul>	<ul style="list-style-type: none"> <li>• Repercussions of mobility on access to healthcare (ID card issues).</li> <li>• Lack of interpreters in most healthcare facilities.</li> <li>• Overcrowded hospitals.</li> <li>• Communication barriers.</li> <li>• Discrimination.</li> </ul>

			<ul style="list-style-type: none"> <li>• Receiving psychological support from friends and family.</li> </ul>	
UK	Fragmented between levels of government (horizontal) and within levels of government (vertical)	National Health Service (NHS),  NGOs (e.g. The British Red Cross Society).	<ul style="list-style-type: none"> <li>• In terms of immigrants' access to healthcare, the rules are frequently changing in the UK, creating immense complexity.</li> <li>• Legislation to restrict access to healthcare based on immigration status.</li> <li>• Since the creation of the 'hostile environment', numbers of people being denied registration at GP practices have increased.</li> <li>• Increased demand for mental health services, leading to shortages in psychiatrists and nurses with training in mental health.</li> <li>• Discrepancy in emotional wellbeing (Asylum seekers vs. Refugees, and in detention vs. out of detention).</li> </ul>	<ul style="list-style-type: none"> <li>• Language barriers.</li> <li>• Lack of understanding about how the NHS works and the services available prevent refugees from using services they are entitled to.</li> <li>• Isolation.</li> <li>• Inability to successfully link up with a community or to build up a new community.</li> <li>• Confusion about entitlements amongst health workers often prevents refugees receiving free services.</li> <li>• Complexity of the rules and confusion surrounding proof of identity documents.</li> <li>• Lack of a permanent address to receive correspondence affects access to mental health services.</li> <li>• Sub-par mental health services.</li> </ul>

## 6. Citizenship and Civic Participation

This section reviews the main tendencies in the modalities of naturalization and citizenship with an emphasis on asylum seekers and refugees. It highlights common criteria for citizenship acquisition across receiving countries by pointing out common trends. It briefly discusses the main challenges and barriers to accessing citizenship, and it also highlights aspects of civic and political participation of refugees.

From an institutional perspective, “citizenship is a legal relationship between a state and an individual” (Triandafyllidou 2015: 43). The granting of citizenship to ‘non-nationals’ is under the authority of state institutions and rooted in the political history of a given country (Washbrook 2019). The European Union (EU) defines citizenship as “the particular legal bond between an individual and his or her State, acquired by birth or naturalisation, either by declaration, choice, marriage or other means under national legislation” (EC 2019).

Current statistics on citizenship acquisition in the EU demonstrate a stable trend in recent years in member states. The naturalisation rate, calculated as the share of foreign citizens acquiring the citizenship of a state in relation to the total number of foreign citizens resident in the same state is around 2% in the EU member states (Sobczak-Szelc et al. 2020: 115). As **Table 1** displays, the total number of persons who gained citizenship in one of the EU-28 Member States, is slightly down from 887.743 in 2014 to 829.274 in 2018. Most new citizenships in 2018 were granted by Germany (116,800 or 17% of the EU-27 total), Italy (112, 500 or 17%), France (110, 000 or 16%), Spain (90, 800 or 14%) and Sweden (63 800 or 9%) (EC 2020) while the numbers are relatively lower in Austria and Poland.

**Table 2: Acquisition of citizenship by country**

<b>GEO/TIME</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
<b>EU – 28 countries (2013-2020)</b>	887.743	839.740	993.266	823.667	829.274
<b>Germany</b>	110.610	110.128	112.843	115.421	116.750
<b>Greece</b>	20.913	13.933	33.210	34.305	27.857
<b>Italy</b>	129.887	178.035	201.591	146.605	112.523
<b>Austria</b>	7.570	8.144	8.530	9.125	9.355
<b>Poland</b>	4.073	3.974	3.684	4.233	5.115
<b>Sweden</b>	43.510	49.044	61.294	68.898	63.818
<b>United Kingdom</b>	125.605	118.000	149.372	123.106	157.004

Retrieved from Eurostat Data [Acquisition of citizenship \[TPS00024\]](#), Last updated 30.03.2020 Last extracted 13.09.2020.

Of those acquiring the citizenship of an EU-28 Member State, more than half had previously been citizens of non-EU countries as shown in Table 2 below. Regarding the country of origins, the citizens of Morocco made up the highest numbers, followed by citizens of Albania, Turkey and Brazil (EC 2020).

**Table 3: Acquisition of citizenship in EU-28 countries by non-EU nationals**

<i>GEO/TIME</i>	2014	2015	2016	2017	2018
<i>Germany</i>	82.408	81.463	79.621	76.038	79.100
<i>Greece</i>	20.248	13.315	32.329	33.297	27.052
<i>Italy</i>	120.455	158.885	184.626	135.804	103.463
<i>Austria</i>	6.335	7.011	7.173	7.482	7.316
<i>Poland</i>	3.816	3.697	3.460	4.040	4.872
<i>Sweden</i>	30.528	34.034	42.924	48.717	44.179
<i>United Kingdom</i>	115.392	104.792	131.796	90.688	106.263

Retrieved from Eurostat Data [Acquisition of citizenship \[TPS00024\]](#), Last updated 30.03.2020 Last extracted 13.09.2020.

Asylum seekers and refugees also have access to naturalization, which refers to “any mode of acquisition after birth of a nationality not previously held by the person that requires an application by this person or his or her legal agent as well as an act of granting nationality by a public authority” (IOM 2019: 145). Both the Refugee Convention and the Convention on Stateless Persons requires States to “facilitate the naturalization of refugees and stateless persons respectively, in particular by expediting naturalization procedures and reducing the charges and costs of such procedures” (IOM 2019: 145).

Asylum seekers and refugees often want to access the citizenship of their country of residence and/or obtain dual citizenship to enjoy certainty and stability and to be able to develop a vision for future. Despite some uncertainties, a substantial number of refugees in our country samples (but not all of them) feel positively towards acquiring the citizenship of the settlement country. For example, a study of recognized asylum seekers who arrived between 2008 and 2012 showed that four out of five refugees were aiming to obtain permanent residence and naturalization in Germany (Chemin and Nagel 2020: 64). A recent survey in Turkey, titled “Syrian Barometers” has illustrated that 80,3% of Syrians would like to have either dual citizenship – both Syrian and Turkish- (57,7) – or only Turkey citizenship (22,6) (Syrian Barometer 2019: 144).

Gaining citizenship for asylum seekers/refugees is considered a tool to access rights as described by Brettell (2006) who calls this “pragmatic citizenship”. Acquiring citizenship may enable practical benefits such as eligibility to sponsor family members, freedom of movement both within the country and within the EU as well as full rights in education, work and health. From a sociological viewpoint, citizenship is a process of identity construction and of developing a sense of belonging to the host country or a dual sense of belonging towards both home and host countries (Coutin 2003).



As naturalization falls under state jurisdiction, there are few common binding rules about it that are endorsed by international instruments (EUDO 2015). The requirements for naturalization are multiple and vary across countries, as illustrated in the **table** in Section 6.2. The requirements include objective criteria, such as proof of identity, having a permanent residence permit for a certain number of years, as well as subjective criteria like having a decent way of life or good character. Self-support, language proficiency and citizenship tests have become increasingly common criteria for naturalizations. Language and citizenship tests aim to measure the 'social integration' of applicants as naturalization is considered to be the final step in the integration process.

The main trends and challenges in the access of asylum seekers and refugees to naturalization and citizenship can be summarized as shown in **Table 6.2**.

- The countries addressed in this study (Germany, Sweden, Austria, UK, Poland, Italy, Greece, Turkey and Iraq) have diverse citizenship regimes and multiple procedures for the naturalization of asylum seekers and refugees. The residency duration criteria, which is the main criteria for applying for naturalization, varies according to the status and country of origin of immigrants.
- Granting citizenship is mainly under the imperative command of the state, while supranational authorities (mainly the EU) have limited power over rules and standards.
- Institutionally, the governance system of citizenship is highly fragmented. Although there are multiple application modules, including local-municipal and regional authorities, central state institutions hold a discretionary power over citizenship decisions.
- The naturalization processes – both in legislation and administration – have been more constrained since 2015-16. A restrictive turn in policies moved liberal immigration regimes towards EU minimum level (e.g., Sweden, Germany). Obtaining a permanent residence permit became extremely difficult, while issuing temporary protection to asylum seekers from the main origin countries, such as Syria became the new norm (e.g. Sweden, Germany, Austria, Turkey). The barriers to accessing permanent residency prevent the possibility of family reunification and mobility and this is readily observable in Sweden, Austria and Germany. The exception in this regard is Poland, which liberalized its citizenship regime with a new law that entered into force in 2012.
- Asylum seekers, who are given subsidiary protection status (and are not recognized as refugees), are put in more disadvantageous positions as they are asked to maintain a longer period of residency in order to apply for naturalization than refugees (e.g. in Austria, Poland and Greece).
- Policy makers attribute particular importance to attendance in courses and the meeting of educational requirements of the country of residence in order to obtain citizenship. Language acquisition and citizenship tests have become more popular as part of the procedures of naturalization. For instance, Italy introduced a language requirement in late 2018. Greece launched its citizenship test in 2019, and Sweden has begun discussions about introducing a test.
- The bureaucratic procedures are highly complex and costly for applicants who are required to submit multiple documentations, translations, applications and payments. Some refugees do not have a detailed understanding of their rights and the procedures for citizenship applications (e.g., Sweden, Turkey).
- Long waiting periods of up to a decade, delays (e.g., Sweden, Germany), loosely grounded rejections on the basis of subjective criteria (e.g., the UK) or the impossibility of appeal in some cases (the presidential type in Poland) are observable in the practices of citizenship applications.

- Identity-related sensitivities and geopolitics may overwhelm debates on which nationalities are given the right to access citizenship, causing inconsistencies and a lack of transparency (e.g., Turkey, Iraq).
- Dual citizenship is not possible in all countries. Both in Austria and in Germany, applicants of naturalization need to renounce their original citizenship.
- While civil society and municipalities take active roles in asylum seekers and refugees' paths to integration and belonging, national level support remains limited. Some practices of the national authorities, such as detention upon arrival (e.g., UK), mass poor reception conditions (e.g., Greece), structural discrimination (e.g., Germany) and backlogs in the system (e.g., Sweden) hamper the integration aspirations of immigrants.

An important recent step for integration is political participation and representation that mobilize active citizenship – the way citizens work agentively as part of a democratic society (e.g., voting, standing for election, campaigning, volunteering, civil society activism). According to EU law, EU nationals who live in another member state have the right to vote in local elections and in elections for EU Parliament. In general, barriers exist for non-EU immigrants' to fully access electoral participation, such as voting in elections (national, regional), establishing or joining political parties and standing in elections. Despite general restrictions over political rights over non-EU nationals, some countries (e.g., Sweden, the UK, Belgium, Spain, the Netherlands, Greece) have gradually extended municipal voting rights to some categories of third country nationals meeting a number of criteria (e.g., duration of residence, registration, specific residence status, reciprocity) (Groenendijk 2008). Nevertheless, the political rights of immigrants have been on the agenda of many EU countries. In Germany, immigrants are not allowed to vote in local and municipal elections if they are not EU citizens, but they are allowed to participate in political parties. Discussions about voting in local elections continue in Italy and Poland.

As shown in **Table 6.2**, the civic engagement of refugees is limited and varies across place of residence (urban vs rural). While many refugees are interested in the political developments both in their country of origin and in their country of residence, newly arrived refugees often avoid visible political engagement due to their precarious situation while waiting for asylum decision. Long waiting times and uncertainties in the asylum process, challenges in stabilizing financial status and barriers in getting permanent residency hinder the civic involvement of asylum seekers. The establishment of immigrant organisations is more common among refugee groups and diasporas that have been in the country for an extended period of time. In almost all countries, immigrants tend to engage with local advisory councils and to participate in civil society activities.

## 6.1. Country cases

### AUSTRIA<sup>58</sup>

#### Legal and Institutional Framework

The 1985 Citizenship Act (amended 2011) regulates the rules in acquisition in Austria. Austrian citizenship is acquired through descent from Austrian parents, marriage to an Austrian partner, or through application. Naturalization requires at least ten years of uninterrupted residence in Austria, whereby five years must have been spent under a permanent residence). Applicants are also obliged to submit proof of self-support, a proof of police clearance of any criminal offences,

<sup>58</sup> Josipovic, I. and Reeger, U. (2020, June 17). Integration Policies, Practices and Experiences – Austria Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3898430>

language skills and a citizenship test (Josipovic and Reeger, 2020: 55). As in Germany, applicants also need to renounce their original citizenship due to the impossibility of dual citizenship (Ibid.).

### **Main trends**

The amendments to the citizenship law in 2011 made the rules more restrictive, aiming to prevent further immigration and family reunification (Josipovic and Reeger, 2020: 55). It upgraded language requirement from level A2 to level B1. This law also introduced an interesting rule in which voluntary entry into foreign military service started to be considered as reason for withdrawal of Austrian citizenship. In 2013 there was a progressive reform recognizing good language skills and voluntary civic engagement services as a basis of reducing the time period for naturalization from 10 to 6 years. This progressive act did not last long, because in 2018, a new Aliens Law amendment act extended their waiting period for application to citizenship to ten years again. In overall, naturalization rate is very low, below one percent and around 10,000 people in 2018.

### **Main Problems and Challenges**

Requirements for naturalization are restrictive particularly for migrants with low income and low level of education. Many of the migrants who have been living in Austria for several decades or were even born in the country, do not have a chance for naturalization (Josipovic and Reeger, 2020: 55-56).

## **GERMANY<sup>59</sup>**

### **Legal and Institutional Framework**

New Citizenship Law of Germany was introduced in 2000. There are three pathways to acquire German citizenship, including by descent (at least one parent is German), by birth on German territory (if at least one parent has been legally in German for at least eight years and has the right to permanent residence) or by naturalization (Chemin and Nagel 2020: 64). For naturalization, the following criteria have to be met: at least eight years of residence permit, completion of integration course, knowledge of Germany, and naturalization test.

### **Main trends**

Since 2000, more than 2.3 million migrants have been naturalized as German citizens; naturalization numbers have remained constant by year. Around one out of three applicants in were from Turkey. It is expected that around 5 million people in Germany would fulfil the formal requirements for naturalization, leading to an annual two per cent naturalization rate (Chemin and Nagel 2020: 65).

There is a desire for participation of refugees in NGOs' refugee consulting and local administration bodies such as municipality level integration councils both for the sake of representation and "teaching" them democratic values in a paternalistic manner (Chemin and Nagel 2020: 65). The tendency among the recognized refugees to be members of an association or organization seem high, particularly those in sport and religion (Ibid.). Some refugees, particularly those with a higher education and from a middle-class position find opportunities in engaging with issues about politics and asylum rights when they live in urban centres (Ibid.: 66). Some refugees have also limited access to following the news about Germany due to the language barrier, while many are interested in pursuing political developments in their country of

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<sup>59</sup> Chemin, J.E. and Nagel, A.K. (2020, June 3). Integration Policies, Practices and Experiences – Germany Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3874426>

origin (Ibid.: 68). In general, many refugees show engagement with local communities and turn into volunteers whenever the opportunities appear and they have needed resources such as language (Ibid.: 68).

### **Main Problems and Challenges**

Majority of the refugees aim at permanent residence and naturalization in Germany. However, for newly arrived refugees, naturalization is a long-term process spanning almost a decade since they first have to document several years of residence permit along with fulfilling other criteria such as language and citizenship test (Chemin and Nagel 2020: 65). Notably, the applicant's previous citizenship must be abdicated. All these make German citizenship acquisition a long and demanding process, but still desirable one (Ibid.: 77). Structural racism in the German refugee bureaucracy can be added as a challenge, having implications over getting permanent residence permit, family unification and naturalization (Ibid.: 65).

## **GREECE<sup>60</sup>**

### **Legal and Institutional Framework**

Greek Citizenship Code (Law 3284/2004, amended 2019) regulates the procedure and conditions for the acquisition of Greek citizenship. It is possible to get citizenship by birth, attendance of school implementing the Greek mandatory curriculum, recognition, adoption, ranking in the armed forces (of non-nationals of Greek origin) and naturalisation (Leivaditi et al. 2020: 20).

Recognised refugees are allowed to apply for naturalization after having lived in the country continuously and legally for at least three years, while beneficiaries of subsidiary protection need seven years of residence. Both are obliged to meet the conditions of social integration that are stipulated by law (Ibid.: 60). Importantly, a conviction for illegal entry in the country does not obstruct the naturalisation procedure (Ibid.: 20). Procedure first starts with a submission of a statement for naturalization to Municipal Authority of the place of permanent residence and an application to the Naturalisation Committee, with final decision to be made by the of Ministry of Interior (Ibid: 60). After acquiring Greek citizenship through naturalisation, migrants are able to enjoy full access to citizen rights, including getting the right to free movement within Greece and the EU, the right to vote and stand for elections and the right to work in civil service (Ibid.: 61).

### **Main Trends**

The acceptance rate for naturalization is as high as 66.5%, some 2528 persons in 2018. Majority of naturalised persons are from Albania, Ukraine, Russia, Moldova, and Romania, while only 528 are from other countries. There is no specific data about the naturalisation of refugees or beneficiaries of international protection (Leivaditi et al. 2020: 61). Eurostat data provides some proxies about it. Some 285 person from Africa, 7 from Afghanistan, 20 from Iraq and 78 from Syria in addition to the 16 stateless persons were granted citizenship in 2018 (Eurostat 2020 in Ibid.: 61).

A wide range of different organisations and solidarity initiatives are engaged in integration programmes and actions, often in collaboration with local governments (Ibid.: 63). One of the active organizations is the *Greek Forum of Refugees* that focuses on refugee participation, raising awareness, protection rights and advocacy. It encourages refugees and asylum seekers

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<sup>60</sup> Leivaditi, N., Papatzani, E., Ilias, A. and Petracou, E. (2020, June 9). Integration Policies, Practices and Experiences – Greece Country Report (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3886993>

to organise themselves in order to collectively elect their own leaders and engage in the public debate (Ibid: 64).

### **Main Problems and Challenges**

The naturalization procedure is extremely slow, lasting in average 1,494 days due to a considerable backlog pending, repetitions in decision procedures and delays since 2010 (Leivaditi et al. 2020: 60). Only 73% of 113,724 citizenship applications submitted between March 2010 and April 2018 had been decided as of mid-2018 (Ibid.). Since 2019, applicants are obliged to take citizenship tests for naturalization. The test is complex and necessitates the extensive knowledge of the Greek history, culture, politics, and literature (Ibid.: 60-61).

In general, the civic engagement of refugees is limited and depends on the place of residence (Ibid.: 66). Refugees living in the large Greek cities find more opportunities for civic participation at the local level than those living in the Hotspots at the North-eastern Aegean islands as the latter group deal with tragic survival challenges, such as safety and security (Ibid.). Refugees in the islands are criticized by NGOs for not organizing to take collective action and for the lack of community leadership that is expected to mediate conflicts in reception centres (Ibid.). While many refugees are interested in the political developments, both in their country of origin and in Greece, newly arrived refugees often avoid political engagement due to their precarious situation (Ibid.: 69-70). Among long-staying refugees, some formed refugee political organisations or groups, such among Kurdish political refugees.

## **IRAQ<sup>61</sup>**

### **Legal and Institutional Framework**

Iraq has a political refugee law, Law No. (51) of 1971, stating that refugees are equal to Iraqi citizens. However, this law has not been put into practice effectively due to the fragile political structure and political interactions between the various forces that control political process and conflicts that exist between the Federal government and the Kurdistan Regional Government (Warda and Almafraji 2020: 62). Iraq has historically been home to large stateless populations (ca. 47,515 stateless people), such as Farsi Kurds fled from Iran to Iraq who were stripped of their nationality in 1980, Palestinian Refugees from Syria, Bidoon from Kuwait and Doms (Statelessness 2019).

The Iraqi Nationality Law (# 26) of 2006 regulates the citizenship acquisition of both migrants and refugees. The law allows registered asylum seekers to apply for citizenship after 10 years of continuous stay in Iraq. Additionally, applicants are required to “not be convicted of a felony or misdemeanour of honour and can support himself by any apparent means of living, and does not have serious transitional diseases” (Ibid.: 62). The Minister of Interior may also accept the naturalization of a refugee married to an Iraqi woman or man with a period of residence not less than five years in Iraq and remain married for at least five years. Despite the existence of political refugee law since 1971 Palestinians (numbering ca. 8,000) had no opportunity to access citizenship, similar to many other Arab countries. The naturalization is not possible for Palestinian refugees in relation to political concerns. However, this is legitimized with guaranteeing the right to return to their homeland as proposed by the Ibid.: 62).

After getting the nationality, refugees have the same rights as Iraqi citizens, except the right to be elected as a minister or a member of a parliament ten years before the date of acquiring the

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<sup>61</sup> Warda, W.K. and Almafraji, H.S. (2020, September 8). Integration Policies, Practices and Experiences – Iraq Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4019804>

Iraqi nationality. Political participation of non-Iraqi citizens is limited, as they are not allowed to establish parties, participate in elections and referendums.

### **Main Problems and Challenges**

The Iraqi authorities have significant discretion to deprive naturalised Iraqis of their nationality, including in situations where the person planned or committed an act against State security or safety. Access to civil registration can be problematic, especially for IDPs and other stateless groups residing in the country. Civil registration procedures differ between governorates. One of the most significant obstacles to access is lacking documents that prove identity and the difficulties with seeking replacements. As a result, many families, specifically IDPs, are unable to access civil registration procedures.

Syrians, especially in the Kurdistan Region of Iraq, were able to involve in self-governance activities such as joining camp management, the decision-making on their own affairs and forming neighbourhood committees that work with local authorities. The Syrians established professional unions as the Union of Syrian Kurdistan teachers in Erbil in 2014. Despite some early achievements of Union in the appointment of some Syrian teachers to the territory schools and mapping the problems faced by Syrian students and teachers in education sector, the union has gradually been reactivated due to lack of adequate cooperation and coordination and resources to address teachers' needs. In general, human rights and humanitarian organizations as well as religious and ethnic organizations have contributed to the integration of refugees (Warda and Almafraji 2020: 53).

## **ITALY<sup>62</sup>**

### **Legal and Institutional Framework**

Citizenship Law (1992) regulates the Italian citizenship that is based on the *jus sanguinis* criterion, being Italian citizens' descendants. Also, Italian citizenship can be granted through request, adoption, state employment and residency. The residency duration criteria for applying for naturalization varies according to the status and country of origin of immigrants. While it is four years for a citizen of a Member State of the European Union, five years for a stateless person and beneficiaries of international protection and ten years for non-EU migrants. The second-generation migrants must have uninterrupted residency from birth to the age of 18 years (Ibrido and Marchese, 2020: 50). The Law in December 2018 obliged applicants for Italian citizenship to have knowledge of the Italian language. Even if all criteria are met, the Ministry of the Interior has a discretionary power over citizenship decisions.

### **Main Trends**

In 2011-2017 period the highest number of foreigners that acquired Italian citizenship originated from European states. For the same period, foreigners of African origin who acquired Italian citizenship more than doubled. The year 2015 represented a peak in successful application procedures, some 122,196 migrants were granted Italian citizenship and 39,749 applicants originating from non-European countries such as those situated in the European continent (Albania, Romania, Moldova, Ukraine, Macedonia) and elsewhere (Morocco, India, Pakistan, Ecuador, Peru) (Ibrido and Marchese, 2020: 58). Number of recognized refugees among these groups are not available, but expected to be low due to the fact that the noted countries of origin are source of labour migration and more than 30 per cent of citizenship applications in Italy are related to marriage (Ibrido and Marchese, 2020: 59). Eurostat data gives insights about the

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<sup>62</sup> Ibrido, R. and Marchese, C. (2020, June 15). Integration Policies, Practices and Experiences– Italy Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3894103>



numbers as it differentiates with country of origin. For example, in 2018, some 112 persons from Syria, 51 from Iraq, 48 from Afghanistan, 370 from Turkey and 15 stateless persons were granted Italian citizenship (Eurostat 2020).

There has been a prospect for reforming the citizenship law of 1992 particularly for enabling the acquisition of citizenship by minors born or educated in Italy that is inspired by the German citizenship model (Ibrido and Marchese, 2020: 51). The bill in 2015 failed to be concluded due to the dissolution of Parliament. Since 2018, three different bills about naturalization eligibility criteria for foreign minors have been under discussion (Ibrido and Marchese, 2020: 51).

Civil society activism of pro-migrant organizations is also outstanding in Italy such as campaigns organized to recognize Italian citizenship for children born in Italy to foreign parents and voting of immigrants in local elections. (Ibrido and Marchese, 2020: 51).

### **Main Problems and Challenges**

The main obstacles include the long and complex bureaucratic process of naturalisation, restrictive requirements and the wide margin of administrative discretion. These barriers often resulting in negative decisions.

Associations established by migrants are not able to take a prominent role in the governance architecture of Italy, with some exceptions (Ibrido and Marchese, 2020: 61). Migrants do not take part in political decision-making, despite the existence of Councils of Migrants. Often, the views of migrants is consulted through associations that work in the field of migration (Ibrido and Marchese, 2020: 61).

## **POLAND<sup>63</sup>**

### **Legal and Institutional Framework**

Naturalisation in Poland is regulated by the Law on Polish citizenship (2 April 2009) which entered into force on 15 August 2012. The new Law is considered as an “open vision of Polish citizenship” as it introduced a relatively liberal approach to naturalization in contrast to the previous citizenship law that dated back to 1962 (Sobczak-Szelc et al. 2020: 114-5). According to his Law, beneficiaries of international protection can obtain Polish citizenship through two procedures: by being granted citizenship by the Polish President or by being recognized as a Polish citizen (Sobczak-Szelc et al. 2020: 111). For the first procedure, there is no criterion of knowledge of Polish language and fee. The President’s refusal is a final decision and cannot be appealed. For the second procedure administered by *Voivode* (regions or provinces), both refugees and subsidiary protection beneficiaries have to obtain first a permanent residence permit or EU long-term residence permit after their continuous stay in Poland for at least 5 years before the submission of the application. After getting residence permit, a refugee can get Polish citizenship after staying 2 more years. The beneficiaries of subsidiary protection have to fulfil the same criteria as any other foreigners who obtained permanent residence permit or EU long term residence permit in Poland (i.e. 2-3 years’ stay in Poland on this basis or 10 years of legal stay in Poland independently of the basis of the stay, stable and regular sources of income, legal entitlement to stay in a residential property) (Sobczak-Szelc et al. 2020: 112). Both refugees and beneficiaries of subsidiary protection to be recognized as a Polish citizen have to prove that they

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<sup>63</sup> Sobczak-Szelc, K., Pachocka, M., Pędziwiatr, K. and Szałańska, J. (2020, August 30). Integration Policies, Practices and Experiences – Poland Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.4008666>

know Polish language. Applicants do not require renouncing previous citizenship, which could be possible according to the Polish previous law on citizenship dated to 1962.

### Main trends

The naturalisation rate<sup>64</sup> of 2%, positioned Poland in the middle among the EU member states (Sobczak-Szelc et al. 2020: 115). Numbers of foreigners who have acquired Polish citizenship either by being recognized as a Polish citizen by *Voivode* or by being granted Polish citizenship by the President increased from 2,361 in 2011 to 6,450 in 2019, but the data on the ratio of those under international protection in this picture is not available (Sobczak-Szelc et al. 2020: 115). However, the data obtained from the Ministry of the Interior and Administration shows that only 162 refugees were granted Polish citizenship between 2012 and 2019, while office of foreigners provided the number of 50 (Sobczak-Szelc et al. 2020: 116).

Some migrants are involved in volunteering and in consultancy activities. For example, the Multicultural Centre in Warsaw, which is currently the main space for actions aimed at increasing integration (cultural projects, language training, and serving as an entry point for regularisation of stay applications) (Sobczak-Szelc et al. 2020: 122). Few cities, such as the City of Gdańsk and Wrocław have a local immigrant council that was formed to advise the Mayor and other local authorities on issues and policies related to migrant and refugee integration. Twelve non-national residents, including refugees living in this city take part in local councils (Sobczak-Szelc et al. 2020: 123). Refugees tend to follow the news in Poland to familiarize themselves with political developments, particularly those concerning policies and attitudes towards migrants (Sobczak-Szelc et al. 2020: 11).

### Main Problems and Challenges

Civic participation and acquisition of citizenship in Poland is not an easy process for refugees (Sobczak-Szelc et al. 2020: 11). Beneficiaries of international protection have to wait at

least for 7 years (in case of refugees) or 10 years (in case of persons with other types of protection) after their arrival in Poland in order to apply to *Voivode* to be recognized as a Polish citizen. Meeting the criteria of language acquisition turn into an obstacle to naturalisation due to the costs of transportation to the city of the exams and high fees.

Other difficulties include getting a legal entitlement about a residential property (e.g. landlords often do not want to sign a rental agreement, prefer oral agreements) and accessing civil registration documents from a country of origin (Sobczak-Szelc et al. 2020: 112). In theory, the decision to naturalization application should last up to two months, but in practice it often takes longer (Sobczak-Szelc et al. 2020: 111). An additional factor hindering naturalisation of beneficiaries of international protection is a lack of information about the naturalization procedures provided by the administration offices (Sobczak-Szelc et al. 2020: 131).

Refugees participation in local politics such as elections and referendums is curtailed, as the country “has neither signed, nor ratified any of the chapters of the Council of Europe Convention on the participation of foreigners in public life at local level” (Sobczak-Szelc et al. 2020: 120). In 2012, a debate started about granting foreigners with permanent residence the right to vote at the local elections within the context of ‘Poland's migration policy - current state and postulated actions’ however, this document was revoked in 2016. Despite a few examples, participation of migrants in general and refugees in particular in consultative bodies at the central and local government in Poland is very limited (Sobczak-Szelc et al. 2020: 123). Beneficiaries of international protection are members of few social organisations, but there is an aspiration for

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<sup>64</sup> Naturalisation rate - calculated as the share of foreign citizens acquiring the citizenship of a state in relation to the total number of foreign citizens resident in the same state

self-organization and active participation in social organisations among long-residing migrants (Sobczak-Szelc et al. 2020: 124). Refugee-led organizations such as Refugee Self-Help Centre (look for means to facilitate their integration (e.g. cultural and civic education, language education) as well as space for assistance and information exchange for the asylum seekers and refugees who try to navigate in the Polish system (Sobczak-Szelc et al. 2020: 125).

## **SWEDEN<sup>65</sup>**

### **Legal and Institutional Framework**

The Swedish Citizenship Act (2001:82) (SCA) regulates the rules of obtaining Swedish citizenship, while Swedish Migration Agency (SMA), as the executive administrative agency has the main responsibility in granting citizenship. Main pathways for citizenship include application to naturalisation, citizenship acquisition by declaration, and citizenship acquisition by birth (Cetrez et al. 2020: 74). The requirements for naturalization application include proof of identity, having a permanent residence permit in Sweden, having a decent way of life, and being above 18 years old. Criteria for residing in the country vary according to the legal status and country of origin. It is two years for the citizens of other Nordic countries (Danish, Finnish, Icelandic or Norwegian citizens); four years in the case of those who are stateless or classified as a refugee, and five years in relation to other foreigners (e.g. beneficiaries of subsidiary protection status) (Cetrez et al. 2020: 74). The requirements are less complicated than other EU member states and other Nordic countries. Unlike these countries, Sweden does not ask for proof of language proficiency, require citizenship (or social orientation) test, financial self-reliance, and an oath of allegiance (Cetrez et al. 2020: 76).

### **Main trends**

The process of citizenship acquisition and naturalisation cannot begin without having a permanent residence permit. This is the most challenging requirement in the case of those under international protection, particularly for temporary protection beneficiaries. The legal changes in the Temporary Act 2015-16 (TA) stipulated that only asylum seekers granted asylum before 20 July 2016 would be able to obtain a permanent residence permit that is necessary for naturalization. Asylum seekers granted asylum after that date were only able to get a three-year residence permit if they were recognised as refugees, and a 13-month residence permit if they were recognised as beneficiaries of subsidiary protection. Quota refugees who settle in Sweden as the part of UNHCR's resettlement program could be granted a permanent residence permit, meaning to enjoy right the apply for naturalization (Cetrez et al. 2020: 75).

Nevertheless, the number of applications for Swedish citizenship remained at a historically high level in 2019 (Cetrez et al. 2020: 77). Total submitted citizenship cases reached 91,498, while 73,047 of them are naturalization cases (Cetrez et al. 2020: 107). The rise is attributed to the fact that the large number of people who were granted residence permits in Sweden, in line with their asylum process during the mid-2010s became eligible and applied for naturalization. Accordingly, for the same year, the top five nationalities whom were granted citizenship included Syrians, Somalis, stateless, Iraqis and Afghans (Cetrez et al. 2020: 108).

In general, through the introduction of the TA 2015-6, Sweden has shifted its migration and asylum policy from the most liberal and generous in the EU to one that reflects only the minimum EU level. Moreover, there is a political pressure to introduce new obligatory requirements for the

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<sup>65</sup> Cetrez, O., DeMarinis, V., Pettersson, J. and Shakra, M. (2020, July 19). Integration Policies, Practices and Experiences – Sweden Country Report (Version v.1). Zenodo.  
<http://doi.org/10.5281/zenodo.3951714>

newcomers or asylum seekers, such as test on society orientation or language proficiency as being exercised in other EU member states (Cetrez et al. 2020: 76).

Solidarity, empowerment and refugee-to-refugee support are common means of civic participation. Asylum seekers attempt to create and get involved in a space for socialization such as language cafes or other voluntary community projects. They tend to be more interested in social welfare and social integration issues that fall under the agenda of the parties on the left side of the political spectrum such as the Social Democrats. Similarly, particularly those residing in Sweden for a longer time involve in associations and civil society organizations that deal with social issues (Cetrez et al. 2020: 81).

### **Main Problems & Challenges**

Obtaining permanent residence permit is a common obstacle for all asylum seekers who arrived in Sweden after 2016, making them subjected to the maintenance requirements and the limitation in the right to family reunification. A move from a temporary residence permit to a permanent one becomes possible through changing protection permits to job permits. This situation creates a pressure over residents with refugee and asylum backgrounds and some need to seek for fake employment contracts to obtain permanent residency (Cetrez et al. 2020: 77). Specific barrier, particularly for Afghani residents, has been the absence of proof of identity or identification documents (Cetrez et al. 2020: 74). Prolongation of waiting periods for all decisions from asylum to citizenship applications appears a challenge. Processing times gets longer in relation to the implementation of New Administrative Act in 2017, budget cuts of SMA and departure of employees from SMA due to the job insecurity (Cetrez et al. 2020: 76).

Refugees associate gaining citizenship with a vision for the future for themselves and their families as well as gaining legal and psychosocial level security (Cetrez et al. 2020: 87). The obstacles over naturalization and limitation of the right to family reunification can negatively influence efforts of integration into the Swedish society and belonging (Cetrez et al. 2020: 79). With regards to civic engagement, limited involvement of refugees, particularly among newcomers is reported for the Swedish case (Cetrez et al. 2020: 81).

## **TURKEY<sup>66</sup>**

### **Legal and Institutional Framework**

The Citizenship Law (2009, amended in 2014, 2018) regulates the citizenship acquisition of foreigners. It includes provisions for acquisition by kinship or place of birth as well as the citizenship through the decision of a competent authority, through adoption or by right of choice. In December 2016, the Government of Turkey introduced a new law for Syrians access to citizenship through “exceptional citizenship acquisition” criteria based on financial investment in Turkey or made available to “those who stay in the country legally and have already contributed and/or have the potential to contribute to the Turkish society in the fields of science, economy, social life, sports, culture and arts” (Rottmann, 2020: 63). Turkish migration authority Directorate General of Migration Management, under Ministry of Interior proceed all applications for citizenship.

### **Main trends**

Around 110,000 Syrians were granted Turkish citizenship as of December 2019 (Multeciler, 2020 in Rottmann 2020). Although there is uncertainty about criteria and procedures for application,

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<sup>66</sup> Rottmann, S.B. (2020, May 30). Integration Policies, Practices and Experiences – Turkey Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3865824>

our field notes show that Syrians who were granted citizenship commonly have either hold financial capital such as businessmen or educational capital such as engineers, dentists, teachers, doctors or journalists. Many of the interviewed Syrians expressed their desire to get Turkish citizenship and/or dual citizenship for practical reasons such as easiness in travel, gaining more stability and access more rights in education, work and health while some are hesitant to apply, even if eligible, due to the compulsory military service and lack of feeling of belonging.

Most NGOs do not actively lobby for political rights for refugees, although some do attempt to educate refugees about their rights. Refugees themselves also engage in civic and political participation. Since 2012, Syrians formed hundreds of formal and informal establishments labelling them as forums, cultural centres, cultural houses, community centres, associations, courses or gatherings. While some of these entities provide humanitarian aid to Syria, others assist the Syrian refugee community within Turkey. A few organizations have organized themselves as an umbrella forum to collaborate with transnational organisations of the Syrian diaspora abroad and seek to represent Syrians in international platforms (Sahin Mencutek 2020). Some organizations and individuals have been also politically active regarding Syrian politics or local political networks while in Turkey (Rottmann 2020: 68).

### **Main Problems and Challenges**

Turkey does not have a concrete and transparent strategy and legal framework for the naturalization of Syrian refugees who are under the temporary protection scheme. Most of the Syrian refugees do not have a detailed understanding of their rights and procedures about citizenship application.

Although refugees are able to participate in civil society activities through refugee-led community organizations and as being part of Turkish NGOs, they have not yet been able to change existing power relations, as the country's political context categorically opposes rights-based advocacy of any marginalised group, and the national refugee governance is based on temporary protection (Sahin Mencutek 2020).

Non-citizens are not allowed to vote or to officially politically organize, according to Turkish law. When the possible candidacy of a Syrian man was suggested for the national election in 2018, it caused a large public outcry (Rottmann 2020: 68). It gave the political parties the signal that the Turkish public was not ready for any type of formal representation possibility of Syrians – even those who received Turkish citizenship – in local and national elections.

## **UNITED KINGDOM<sup>67</sup>**

### **Legal and Institutional Framework**

The initial legal framework of citizenship regime in the UK was drawn by the Naturalization Act of 1870 which was the precursor to the 1981 British Nationality Act, which constitutes the primary basis for the current law on naturalisation (Atto et al. 2020). The framing of citizenship in current legislation and policy discourses is linked to the main trends in immigrant integration policies. Home Office is the main actor dealing with the citizenship applications.

Application to naturalization requires the five-year residency requirement, the knowledge of both the English language and life in the UK, a loyalty oath and pledge (Atto et al. 2020: 82-83). Refugees and holders of humanitarian protection are eligible to apply for naturalization. First,

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<sup>67</sup> Atto, N., Hirst, C. and Hall, V. (2020, July 14). Integration Policies, Practices and Experiences – United Kingdom Country Report (Version v.1). Zenodo. <http://doi.org/10.5281/zenodo.3945509>



they need indefinite leave to remain after they have been in the UK for five years. After one year of holding indefinite leave to remain status, they can then apply for citizenship. Refugees who are resettled under the Mandate and Gateway schemes are granted indefinite leave along with their refugee status, so they are treated like other migrants during naturalization (Ibid.). An interesting criterion for eligibility for the UK citizenship is having a 'good character,' determined by criminality, the perpetration of international crimes, financial stability, deception, notoriety, and dishonesty, transgression of immigration laws and prior deprivation of citizenship. Home Office has the discretionary power in measuring 'good character' and making substantial number of refusals on this ground, such as 37 per cent of refusals in 2012 (Ibid.).

### **Main trends**

Regarding integration and belonging in general, the UK has a fragmented governance structure, showing difference between levels of government (horizontal) and within levels of government (vertical). National-level support is most frequently seen as inadequate, while local support seems more promising but varies according to context. The same is relevant for the treatment of refugee community organization by governance actors. Localities such as Oxford seem to be eager to include and cooperate with refugee-led grassroots organizations to foster integration (Atto et al. 2020: 87).

### **Main Problems and Challenges**

There are restricted pathways to the regularisation of immigration status in the UK (Atto et al. 2020: 83). Detention of asylum seekers upon their arrival is the worst practice, continuing its negative impact over the belonging as it brings a sense of humiliation (Ibid.: 89). Similar to the experiences of asylum seekers in other countries, long waiting times and uncertainties in the asylum process are common, impeding the access to work, stabilizing financial status, and housing, getting permanent residency and starting a way to naturalization. These barriers also hinder civic involvement of asylum seekers. According to the new Act on Scottish Elections (Franchise & Representation) which passed on the 20th February 2020, the new legislation extends the right to vote in Scottish Parliamentary and local government elections to include everyone with "leave to remain in Scotland," including people with refugee status (or any other form of leave to remain) (Ibid.: 92).



## 6.2. Summative Table – Citizenship

	Governance model	Main actors	Trends	Best / Good practices	Main problems expressed
<b>Austria</b>	Fragmented (in relation to the Federal System)	Federal Office for Immigration and Asylum	<ul style="list-style-type: none"> <li>Restrictive for migrants with low income and level of education; restrictive for family unification</li> </ul>	<ul style="list-style-type: none"> <li>2013 observed a progressive reform recognizing good language skills and voluntary civic engagement services as a basis of reducing the time period for naturalization from 10 to 6 years, but the law was revoked in 2018.</li> </ul>	<ul style="list-style-type: none"> <li>Difficulty to meet the language requirement and to obtain financial support</li> <li>Low level of naturalizations</li> </ul>
<b>Germany</b>	Centralist	Federal Ministry of the Interior, Building and Community; Federal Office for Migration and Refugees; Central Aliens Office	<ul style="list-style-type: none"> <li>Restrictive</li> <li>Long decision process</li> </ul>	<ul style="list-style-type: none"> <li>The highest naturalization rate</li> <li>Inclusion of refugees in local bodies</li> <li>Integration Councils at the local level</li> </ul>	<ul style="list-style-type: none"> <li>For newly arrived refugees, naturalization takes at least a decade</li> <li>Structural discrimination and racism in the German refugee bureaucracy</li> </ul>
<b>Greece</b>	Fragmented (both central and local)	Ministry of the Interior Municipal authorities Naturalization Committee	<ul style="list-style-type: none"> <li>Becoming more restrictive (introduction of citizenship tests) <ul style="list-style-type: none"> <li>Slow process</li> </ul> </li> <li>Low levels of naturalization among those under international protection compared to other migrants</li> </ul>	<ul style="list-style-type: none"> <li>Local solidarity initiatives</li> <li>Activities of NGOs</li> </ul>	<ul style="list-style-type: none"> <li>Difficulty of succeeding in citizenship test</li> <li>Long waiting processes and delays in the naturalization process</li> </ul>
<b>Italy</b>	Fragmented (both central and local)	Ministry of the Interior  Municipalities	<ul style="list-style-type: none"> <li>Prospect for reform in citizenship law</li> <li>Introduction of language requirement</li> </ul>	<ul style="list-style-type: none"> <li>Pro-immigrant association campaigns "I'Italia sono anche io" ("I am Italy too") for 1) recognition of Italian citizenship for children born in Italy to foreign parents who are regularly present in the country and 2) a new rule that recognises the right of foreign workers who have been in Italy for at least five years to vote in local elections.</li> </ul>	<ul style="list-style-type: none"> <li>A long and complex bureaucratic process to obtain naturalisation,</li> <li>Restrictive requirements</li> <li>A wide margin of administrative discretion</li> <li>Often negative decisions.</li> </ul>
<b>Iraq</b>	Fragmented, Differences between Central state and Kurdistan Region in Iraq	Permanent Committee for Refugee Affairs of Ministry of the Interior, Ministry of Migration and Displacement, Kurdistan Regional Government	<ul style="list-style-type: none"> <li>Limited opportunities for naturalization that is also affected by regional political dynamics (e.g., Palestinian refugee)</li> </ul>	<ul style="list-style-type: none"> <li>Syrians involves in self-governance activities (camp-management, decision-making)</li> <li>Syrians established unions, e.g., "Syrian Kurdistan Teachers", Erbil, 2014</li> </ul>	<ul style="list-style-type: none"> <li>Limitations in access to naturalization</li> <li>Short-term self-organizing of refugees, such as into unions</li> <li>Limited civic participation</li> </ul>

Poland	Hybrid, fragmented	Ministry of Family, Work and Social Assistance and regional family support centres	<ul style="list-style-type: none"> <li>• Limited liberalization in naturalization</li> <li>• Volunteering and consultancy activities of refugees at the local level</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• City of Gdańsk has a local immigrant council</li> <li>• Refugee-led organizations contribute to facilitating integration</li> </ul>	<ul style="list-style-type: none"> <li>• Long waiting period for decisions on naturalization</li> <li>• Difficulties in meeting application criteria (e.g. language test, rental registration document)</li> <li>• Limited access to political participation</li> </ul>
Sweden	Fragmented (both central and local)	Sweden Migration Agency	<ul style="list-style-type: none"> <li>• Restrictive turn</li> <li>• From liberal generous policies to EU minimum</li> </ul>	<ul style="list-style-type: none"> <li>• No test or language requirement for citizenship acquisition</li> </ul>	<ul style="list-style-type: none"> <li>• Identity proof requirement for naturalization is a serious challenge for Afghan refugees</li> <li>• Additional difficulties are introduced to get permanent residency</li> <li>• Temporary protection status becomes new norm</li> </ul>
Turkey	Centralist	Ministry of the Interior, Directorate General of Migration Management	<ul style="list-style-type: none"> <li>• Restrictiveness</li> <li>• Non-transparency</li> </ul>	<ul style="list-style-type: none"> <li>• Refugee political inclusion: the example of the Sultanbeyli Municipality in Istanbul</li> <li>• Exceptional citizenship acquisition of some Syrians</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary Protection Status for Syrians is an insufficient legal status</li> <li>• No clarity about naturalization procedures of Syrians</li> <li>• Restrictions over rights-based activism</li> <li>• Limited access to political rights and formal representation</li> </ul>
UK	Fragmented between levels of government (horizontal) and within levels of government (vertical)	<p>The Home Office</p> <p>The Department for Communities and Local Government</p> <p>The Government Equalities</p>	<ul style="list-style-type: none"> <li>• Restrictive</li> <li>▪ Criminalization</li> <li>• Hampering the sense of belonging</li> </ul>	<ul style="list-style-type: none"> <li>• Local initiatives (e.g. Asylum Welcome) and their collaboration with initiatives run by refugees (e.g. Syrian Sisters)</li> <li>• Good relations between local government and local NGOs in Oxford.</li> <li>• Voting rights for refugees in Scotland</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequacy of national-level support</li> <li>• The effectiveness of local support</li> <li>• and cooperation between local government and NGOs varies according to context.</li> <li>• Detention upon arrival</li> </ul>

### 6.3. Summative Table – Requirements for Naturalization by country

	Sweden	UK	Germany	Austria	Italy	Poland	Greece	Turkey	Iraq
<b>Permanent residency permit</b>	5 years	5 years	8 years	10 years residence with 5 years settlement permit	4 years for EU citizens, 5 years for a stateless person and beneficiaries of international protection, 10 years for non-EU migrants	5 years, plus 2 years after application; 10 years for subsidiary protection status holders	7 years for migrants, 3 years for recognized refugees, 7 years for subsidiary protection	5 years, temporary protection holders are exceptional	10 years
<b>Language proficiency</b>	No	B1 level	B1 level	B1 level	Yes Since Dec. 2018	B1 level	Yes	No	No
<b>Self-support</b>	No	Yes	Yes	Yes	nd.	Requirement for subsidiary protection holders	nd	Yes	Yes
<b>Citizenship test</b>	Under discussion	Yes	Integration course and naturalization test	Integration course and citizenship test	No	No	Yes, since 2019	No	No
<b>Citizenship ceremony and oath of allegiance</b>	voluntary	Yes	allegiance to constitution	nd	nd	nd	No	No	No
<b>Conduct criteria</b>	Having a decent way of life, 7 years waiting time for criminal acts	'good character'	No criminal record	No criminal record	Permanent exclusion in the case of criminal acts	nd	nd	Good moral character, no contagious illnesses	not convicted of a felony or misdemeanour of honour

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