



Save the Children

# **GENDER-SENSITIVE PROTECTION RISK AND GAP ANALYSIS**

**Keçiören and Altındağ Districts, Ankara  
Avcılar and Ümraniye Districts, İstanbul**

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# LIST OF ACRONYMS

AFAD	Disaster and Emergency Management Presidency
ALP	Accelerated Learning Programme
ASAM	Association for Solidarity with Asylum Seekers and Migrants
ASDEP	Family Social Support Programme
BA	Bar Association
CCTE	Conditional Cash Transfer for Education
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CMC	Child Monitoring Centre
CP	Child Protection
CVME	Comprehensive Vulnerability Monitoring Exercise
ÇODEM	Child Support Centre
DGMM	Directorate General of Migration Management
ESSN	Emergency Safety and Security Net
FGD	Focus Group Discussion
FHH	Female-Headed Household
FRIT	Facility for Refugees in Turkey
GBV	Gender-based Violence
GoT	Government of Turkey
Göç-Der	Association of Migrant Rights and Social Cohesion
HH	Household
ILO	International Labour Organization
IOM	International Organization for Migration
IP	International Protection
IPA	Individual Protection Assistance
İŞKUR	Turkish Employment Agency
KII	Key Informant Interview
LFIP	Law on Foreigners and International Protection
LGBTI	Lesbian, Gay, Bisexual, Transgender and Intersex
LLH	Livelihoods
MHPSS	Mental Health and Psychosocial Support
MoFLSS	Ministry of Family, Labour and Social Services
MoH	Ministry of Health
MoI	Ministry of Internal Affairs
MoJ	Ministry of Justice
MoNE	Ministry of National Education
MoYS	Ministry of Youth and Sports
MHC	Migrant Health Centre
NFI	Non-Food Items
NGO	Non-governmental Organisation
PDMM	Provincial General of Migration Management
PDoFLSS	Provincial Directorate of Family, Labour and Social Services
PDoH	Provincial Directorate of Health
PDoNE	Provincial Directorate of National Education
PEC	Public Education Centre
PRGA	Protection Risk and Gap Analysis
PSS	Psychosocial Support
RAM	Guidance and Research Centre

SASF	Social Assistance and Solidarity Foundation
SCI	Save the Children International
SED	Social- Economic Support
SGBV	Sexual and Gender-based Violence
SNF	Special Needs Fund
ŞÖNİM	Violence Prevention and Monitoring Centre
SP	Service Provider
SRH	Sexual and Reproductive Health
SSC	Social Service Centre
SuTP	Syrians under Temporary Protection
TAC	Temporary Accommodation Centre
TEC	Temporary Education Centre
TP	Temporary Protection
ToR	Terms of Reference
TPID	Temporary Protection Identity Document
TPR	Temporary Protection Regulation
TRC	Turkish Red Crescent
TRY	Turkish Lira
UN	United Nations
UNCRC	United Nations Convention on the Rights of the Child
UNDP	United Nations Development Programme
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UOSMM	Union of Medical Care and Relief Organisations
UTBA	Union of Turkish Bar Associations
VTC	Vocational Training Centre
WFP	World Food Programme
WGSS	Women and Girls Safe Space
WHO	World Health Organization
YÖS	Foreigner Student Exam

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## DEFINITION OF KEY TERMS

**Asylum Seeker:** A person whose sanctuary has yet to be processed. (UNHCR)<sup>1</sup>

**Child Protection:** Measures and structures to prevent and respond to abuse, neglect, exploitation and violence affecting children. (SCI)<sup>2</sup>

**Migrant:** Any person who moves, usually across an international border, to join family members already abroad, to search for a livelihood, to escape a natural disaster, or for a range of other purposes. (UNHCR)<sup>3</sup>

**Refugee:** Someone who ‘owing to well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence, is unable or, owing to such fear, is unwilling to return to it.’ (1951 Geneva Convention and 1967 Additional Protocol)<sup>4</sup>

**Registered:** Registered individuals are those who have been provided ID documents by the Directorate General of Migration Management (DGMM). Registration grants individuals legal stay in Turkey and enables access to public services and assistance in the province of registration.

**Unregistered:** Individuals who are currently not registered with the DGMM including people who have not yet registered or have pending applications.

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<sup>1</sup> <https://www.unhcr.org/asylum-seekers.html>

<sup>2</sup> <https://resourcecentre.savethechildren.net/library/save-childrens-definition-child-protection>

<sup>3</sup> <https://emergency.unhcr.org/entry/44937/migrant-definition>

<sup>4</sup> <https://emergency.unhcr.org/entry/55772/refugee-definition>, Article 1(A) (2) of the 1951 Convention amended by its 1967 Protocol.

# EXECUTIVE SUMMARY

Turkey is the largest refugee-hosting country in the world, with a registered refugee population of approximately 4 million including 3.68 million registered Syrians under Temporary Protection (TP)<sup>5</sup> as well as 368,000 refugees from Afghanistan, Iraq, Iran, Somalia and other countries under International Protection (IP) registered with the United Nations High Commissioner for Refugees (UNHCR).<sup>6</sup> Following the gradual closure of Temporary Accommodation Centres (TACs), the majority of Syrians (96%) reside in urban areas with the host community and with refugees from other countries. Moreover, there are refugees residing in urban areas, such as Ankara and İstanbul, who are unregistered due to various reasons. As of November 2019, İstanbul is home to 552,080 registered Syrian refugees.<sup>7</sup> Depending on the data source, the total population of ‘migrants’<sup>8</sup> is estimated to be as high as between 888,000 and 1.4 million in İstanbul.<sup>9</sup> The estimated figures include individuals with TP and IP status, those with residence permits as well as the unregistered.<sup>10</sup> In Ankara, there are 94,836 Syrians under Temporary Protection,<sup>11</sup> 30,965 refugees under International Protection<sup>12</sup> as well as those with residence permits and unregistered refugees whose exact numbers are not publicly available.

The Government of Turkey (GoT) undertook significant institutional changes with the ratification of the Law on Foreigners and International Protection (LFIP) (No 6458) in 2013 and replaced the 1994 Regulation<sup>13</sup> which defined procedures with respect to mass arrival and to individual asylum applicants. The LFIP introduced forms of protection namely international, subsidiary, and temporary protection statuses. From 2014 onwards, the GoT further ratified relevant regulations on Temporary and International Protection, defined rights and responsibilities for refugees with regard to accessing basic services such as health, education, formal employment, social services and assistance. In recent years, the role of state actors expanded by assignment of key state institutions at provincial and local level with specific mandates and responsibilities in the provision of services to registered refugees in Turkey.

In the transition period in which state actors assume lead roles in the response to the protection needs of refugees, Save the Children International (SCI) undertook a Gender-Sensitive Protection Risk and Gap Analysis (PRGA) in Ankara with partner organisation Association of Migrant Rights and Social Cohesion (Göç-Der) and in İstanbul, in order **to identify strategic approaches, interventions and modes of dialogue**

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<sup>5</sup>Directorate General of Migration Management, Statistics on Temporary Protection, November 2019, accessed via <https://www.goc.gov.tr/gecici-koruma5638>

<sup>6</sup>UNHCR, Turkey Key Facts and Figures, August 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/71511.pdf>

<sup>7</sup>Directorate General of Migration Management, Statistics on Temporary Protection, November 2019, accessed via <https://www.goc.gov.tr/gecici-koruma5638>

<sup>8</sup>The term ‘migrants’ is used here as per the IOM report’s terminology.

<sup>9</sup>IOM, Turkey DTM Baseline Assessment Report İstanbul, May 2019, accessed via <https://migration.iom.int/reports/turkey-dtm-baseline-assessment-report-istanbul-province-round-1-october-december-2018>

<sup>10</sup>Ibid.

<sup>11</sup>Directorate General of Migration Management, Statistics on Temporary Protection, November 2019, accessed via <https://www.goc.gov.tr/gecici-koruma5638>

<sup>12</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>13</sup>Regulation on the Procedures and the Principles Related to Population Movements and Aliens Arriving in Turkey either as Individuals or in Groups Wishing to Seek Asylum either from Turkey or Requesting Residence Permission in order to seek Asylum from Another Country (Council of Ministers Decision No 94/6169).

**with local and national authorities. This was done with the aim of achieving longer-term, sustainable protection solutions for refugee communities** by examining the following sub-topics:

- National legal framework and policy developments which affect the access of refugees to rights and services.
- District-level policies and programmes in place to prevent and respond to the protection concerns of the most marginalised groups.
- The gaps and barriers in service provision at district-level that hinder the most marginalised groups from achieving adequate protection.
- Resources and capacities at family and community level to enhance resilience, self-reliance and community support.
- Current situation of Syrian and non-Syrian refugees in need of protection services.

The data collection for the PRGA was undertaken between April and July 2019 in the Altındağ and Keçiören districts in Ankara and the Avcılar and Ümraniye districts in İstanbul and relied on primary and secondary data collection methods. The study engaged a wide range of stakeholders, namely refugees from Syria, Iraq and Afghanistan as well as frontline workers from service providers at direct implementation and at policy-making levels.

The presented findings are based on a total of 72 meetings comprising 150 respondents (93 refugees and 57 service providers). Key Informant Interviews (KII) with frontline workers and refugees, along with Focus Group Discussions (FGD) with children, youth and adults were conducted to document needs and capacities with sensitivity to age, gender and nationality. The KII and FGD findings were then triangulated with relevant secondary sources on national legislation, policy documents, assessments by NGOs, UN Agencies and academic sources to interlink the national protection developments to the district-based findings.

## The Protection Context and Services in the Targeted Districts

Responding to the protection needs of refugees with different registration statuses (i.e. unregistered refugees, short-term and humanitarian residence holders, refugees under IP and TP) constitutes a major challenge. The service providers in Ankara and İstanbul have noted difficulties in achieving sustainable solutions for refugees who do not have TP and IP registration. Addressing the protection needs of refugees with registration issues requires the identification of alternative support channels as well as flexible funds to cover lifesaving expenses which refugees often cannot afford; continuation of information dissemination on registration under protection schemes in Turkey. Furthermore, the provision of legal assistance and long-term support for unregistered non-Syrian refugees who are in a position to move to satellite cities is of paramount importance in order to achieve sustainable protection solutions.

In Avcılar and Ümraniye, prolonged registration problems for Temporary Protection status result in members of the same households having different registration statuses, limited access to services and the risk of separation. Legal assistance and support in acquiring the relevant documentation is essential for Syrians in İstanbul following the official declaration in July 2019 to halt new registration for Syrians in the province, in order to ensure a legal right to reside in İstanbul, the family unity of Syrians who belong to the same household and yet have different registration statuses.

Gaps in information on district-level policies and procedures were raised as being a major impediment to the access of refugees and of frontline workers on respective rights and responsibilities. Moreover, a need on up-to-date information on service access points, procedures to follow on health, education and social assistance were also pointed out. Furthermore, policy changes based on internal decrees at provincial and district levels and institutional discretion applied at hospitals, schools and Public Education Centres (PECs) calls for establishing two-way communication channels with state agencies in order to help follow policies and clarify the eligibility criteria for services for Syrian and non-Syrian refugees.

The public protection and social assistance schemes in place primarily target children, women, the elderly, persons with disabilities and large households. The services are, in principle, accessible to registered refugees who reside in their province of registration. These comprehensive assistance schemes do not cover unregistered refugees and have limited targeted interventions adequate to the needs of single men, smaller households and Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) refugees. As an example, the Emergency Safety and Security Net Programme (ESSN) provides cash assistance to households with four or more children, thereby intrinsically excludes which are small in size. The Social Service Centres (SSCs) have expanded over time in physical and technical service delivery capacity. Yet, they still are unable to attend to all protection cases thoroughly, as a result of limited number of staff, language limitations (e.g. only Arabic speaking personnel with regard to refugees' languages), technical ability and lack of official mandate (no mandate for unregistered refugees). Restricted feedback and the lack of structured referral pathways between SSCs and non-governmental organisations (NGOs) at the local level impairs effective case management (i.e. timely interventions, risk prioritisation) and may cause duplication in services.

The diversity of needs among the refugee population (e.g. registration status, special and protection needs per age and gender) necessitates the development of complementary (specialised) services at district-levels, aimed to target refugees who are not covered by the existing protection services due to eligibility or service delivery capacity.

Bar Associations operate within limited legal aid budgets, and encounter language barriers in the lack of provision of interpretation services, coupled with a shortage of lawyers. NGO legal assistance experts in addition to Bar Associations need additional capacity-building on (child) protection and gender issues and on district-based referral pathways to function effectively in the social service system in supporting refugees with different registration statuses, age and gender.

Impediments to institutional outreach hinder the access of NGOs to the most vulnerable and marginalised refugees in Ankara. In İstanbul, the concentration of refugees in peripheral locations, the persistent registration issues that exist and the limited mobility of refugees in the province due to language and financial barriers adversely affects their access to services.

Access to information for non-Syrians is more difficult given the language barriers and the lack of sufficient and accurate information on local services in the refugees' native languages. The communication issues encountered due to language barriers at district-level between refugees and service providers inversely affects the refugees' access to health, education and social services. This appears to also impede the use of facilities such as those provided by local agencies for administrative procedures (e.g. registering home addresses, bills, application for courses, and the acquisition of health reports). The gaps in written and oral communication channels weaken the reliability of formal information disseminated with regard to services and consequently

causes refugees to lean towards information that is circulated by word of mouth or through social circles and online sources, as well as to engage with intermediaries and NGOs in order to make use of services.

## Community Support Mechanisms and Information Sources

Refugee communities make use of different community support mechanisms and information access points in the targeted districts. In Ankara, Syrians predominantly reside in Altındağ, whereas Keçiören is home to Iraqis and Afghans. There is a considerable Afghan community further in Dışkapı, and Ulus reflecting the spatial segregation in the choice of residence among refugees. The spatial distance accompanied by the variety of registration statuses and spoken languages paves the way for closed community structures. This consequently results in the limited sharing of information and support among refugee communities. A lesser amount of support and information-sharing was noted in the case of Afghan and Iraqi refugees, as a result of the scarcity of service provision targeted at these communities. Instead, Afghan and Iraqi participants to this study highlighted formal channels and actors such as NGOs, municipalities, and also local associations as key sources of support and information on services.

Ethnicity-based differences among Afghans and Iraqis affect the level of community support refugees experience in Ankara. Refugees of Turkman and Uzbek origin appear to access information and support more effectively than others. The language and kinship affiliations to Turkey, and presence of local associations established by fellow Turkmans or Uzbeks and by the host community (e.g. provision of charity-based donations, information sharing) enable (sporadic) assistance. However, ethnic minorities such as Farsi Afghans, Iraqi Arabs, and refugees with weaker connections to associations or community members are at risk of becoming disadvantaged.

Syrian refugees, by factors such as availability of services and information in Arabic, seemingly have more access to information on services compared to non-Syrian refugees. On the other hand, the increasing number of Syrian refugees with registration problems, and prevalent issues with high poverty and unemployment as well as social and gender norms pose barriers to both utilising services and the provision of community support amongst this community. In regard to information sources, Syrians make use of online networks such as WhatsApp and Facebook groups more than other refugee communities. Provincial affiliations (from within Syria) cause small community networks to be established among Syrians in Avcılar and Ümraniye where refugees from the same or similar provinces and backgrounds exhibit community support. Decreasing levels of trust in the formal information channels have been displayed by Syrians in Ankara, Avcılar and Ümraniye with the exception of the information channels operated by/through the municipalities.

Access points to information are comparatively limited for most women, girls and the elderly in all districts, with primary sources of information being relatives, siblings, neighbours and male figures in the households. Syrian women in the Yeşilkent neighbourhood of Avcılar are further disadvantaged, many of whom have either registration issues or a member in the household who is unregistered, or lower education levels and limited mobility due to the peripheral location of this neighbourhood in the Avcılar district.

Gatekeeper bias was noted when it comes to the roles of community leaders and local associations. In Ankara Iraqi Turkmans, Uzbek and Turkman Afghans appear to have more diverse access points to the local community and kinship-based local associations. In Ümraniye, the role of Syrian imams and local shop owners in facilitating aid and charity-based distributions raises concerns related to favouritism among the refugees. In

addition, the access to these local networks and gatekeepers by women, and also their safety while doing so is an issue that requires further scrutiny.

Community relations among different refugee groups were explored in Ankara and appear to be limited to small social circles, relatives and neighbours with limited level of interaction observed between Syrian and non-Syrian communities. The seemingly easier access of the registered Syrian refugees to services, provision of supportive measures (interpretation, transportation), as a result of a larger number of programs targeting Syrians, cause resentment among non-Syrian refugees.

In all districts, community relations with the host community seem to take place on personal levels, with increasing introversion observed on the part of the refugee communities following the economic downturn in Turkey and the changing socio-political landscape following the local elections. On the other hand, municipalities, trusted NGOs, local teachers, mukhtars and women active in the community were raised by participants as potential contributors to improved community relations between refugees and the host community.

## Refugees in Need of Protection Services

Despite the efforts at national and provincial level in mainstreaming refugee-access to services, wide spread coverage with increasing specialised services remains a mid to long-term goal. At present, addressing the protection needs of refugees still remains an issue, including the right of children to be protected from violence, abuse, neglect and exploitation. This is as a result of factors such as registration status, limitations around an adequate service capacity, and a lack of available services (both specialised and integrated/holistic) for complex protection issues, at state and non-governmental agency levels.

The primary barrier to protection and accessing basic services is related to registration status. Despite the information dissemination efforts on registration processes, among refugees, persistent information gaps remain. This is aggravated by policy changes on registration, a lack of eligibility criteria on registration in Ankara and İstanbul, and emerging limitations of new registration of Syrians under Temporary Protection (SuTP) in İstanbul. Additionally, the misinformation on the rights and entitlements residence permits bestow upon refugees who may be eligible for IP contributes to the information gaps observed. Unregistered refugees are the most at risk, with no legal entitlement to services other than emergency health care.

With regard to access to education, **40% of school-aged, registered refugee children in Turkey,<sup>14</sup> and 32% of those in the targeted districts<sup>15</sup>** are out of school. **The unregistered refugee girls and boys are deprived of** access to education due to a lack of registration, information, impediments by school administrations in lack of enabling legal framework and stretched physical capacities of public schools. The absence of official recognition of guest student schemes that allow the continuation of studies is an additional barrier for unregistered children's enrolment in schools. Whilst some schools in both Ankara and İstanbul were seen to

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<sup>14</sup>UNICEF Humanitarian Situation Report #34, July 2019, accessed via [https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report\\_Mid-Year%202019.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report_Mid-Year%202019.pdf)

<sup>15</sup>Save the Children International, Baseline Report: Strengthened Protection and Wellbeing Among Refugee, Youth and Adults in İstanbul and Ankara, 2018.

facilitate the admission of unregistered refugees, the policy of İstanbul's Provincial Directorate of National Education (PDoNE) of admitting refugees with valid registration in İstanbul to public schools requires province-level advocacy or identification of alternative support mechanism, i.e. open schools. This is based on the right to education (Article 42 of the Turkish Constitution) and on The United Nations Convention on the Rights of the Child (UNCRC), to which Turkey is a party.

Moreover, a number of risk factors impede refugee children's continuation to education. These include limited language skills on the part of the child and family members, and a lack of complementary support to facilitate the child's adaptation to the school environment. Examples of the types of support that are needed are early-childhood education and compulsory preparatory and language courses prior to the start of the academic year. Public teachers encounter difficulties in supporting children due to the language barriers and limited technical skills. They are further challenged in implementing the sustained integration of refugee and host children in the classrooms. The testimonies seen in the main body of the report from Avcılar and Ümraniye point to the need to support public educators working with refugee children, particularly adolescents, via enhanced skills in communication, and mentoring and support to establishing relations between refugee and host caregivers. High levels of poverty impact significantly on households with multiple children in that they are often forced to choose between children to send to school. Mixed-gender classes in public schools appear to hinder the continuation of girls to further education after primary school, while boys are pushed more into child labour and girls into domestic work.

**Refugee children**, through poverty and the social acceptance of work among refugee and host communities prevalent in the districts, are at risk of or engaged in **child labour**. Syrian and non-Syrian children as young as 10 and 11 years old were noted to be working in the informal market, textile workshops, small local shops, and in manufacturing businesses. For this study, no district-based systematic prevention mechanism on child labour was referred to by the participants. Referrals between SSC and NGOs are taking place, however the capacity of SSCs to effectively deal with all cases (particularly complex child protection) is limited. Additionally, efforts to engage child workers in skills-building activities are undertaken by NGOs in the districts. These interventions, however, are insufficient to address the risks faced by the refugee children. There is a pressing need to document the prevalence of child labour and to advocate for **systematic, holistic and integrated approaches to be put in place for refugee girls and boys** (e.g. job placement for adults, support with ID registration, engaging employers who hire children and facilitating the admission of refugee children into school irrespective of registration status and generation of activities pertaining to MHPSS needs of child labourers).

The issue of **child marriage** was discussed, albeit reluctantly, by Syrian participants in Ankara and Ümraniye. The fear of legal repercussion causes concealment of the harmful practice, and such marriages remain unofficial. Factors compounding child marriage amongst refugees are social acceptance (particularly among the males in the households), poverty and the view that marriage is necessary to guarantee the safety and security of adolescent girls, in particular.

The wellbeing of refugee **girls and boys** is affected by the physical and social risks surrounding them. Precarious physical and social conditions such as neighbourhoods being detached from services, lack of road safety, substance abuse in close proximity to children and deserted roads and houses, have been observed in all the targeted districts. Sources of information available to girls are fewer in comparison to those available to boys and adults due to the social and gender barriers in place. Social pressure and the risk of being confined to the home occurs in the case of adolescent girls. This is caused by efforts on the part of caregivers to allay

insecurities brought on by what are perceived to be risks in the neighbourhoods. On the other hand, boys arguably are more susceptible to discrimination and maltreatment while outside the home because they have more access to the wider community.

Poverty, limited information sources and having relatively lower education levels hinders **women's and girls'** chances and opportunities to engage in the community and take care of their own wellbeing. In addition, language barriers, social and gender norms and a lack of registration also impacts in a negative way. They are susceptible to protection risks such as gender-based violence in the household or in the informal economy and forced marriage. Female heads of households are further made vulnerable by having limited means to access an income, as a result of a lack of child-care for dependents and available jobs, as well as limited resources for self-care. Working with women and girls in the targeted districts necessitates the provision of dedicated safe spaces, childcare services, legal assistance, development/skills-building activities (e.g. language and vocational courses) and venting opportunities. It also necessitates addressing discriminatory gender norms by working with boys and men as well.

Arguments in the household with males and indications of profound stress were noted in Altındağ and Avçılar. This, however, could well apply to all districts, stressing the continuous need to provide women and girls with information and support with regard to their rights and access to protection mechanisms. There are ongoing initiatives, preventative in its nature, to address the risk of Sexual and Gender-based Violence (SGBV) as well as responses undertaken by NGOs and the SSCs in the districts which are further detailed in the main body of this report. Yet, many women refrain from seeking institutional support. Also, a number of structural impediments hamper those refugee women and girls who do seek to utilise public protection mechanisms. These are complex administrative processes to access shelters, unclear access pathway for unregistered women, sub-par assistance at access points such as police stations, hospitals, ŞÖNİMs based on lack of knowledge or at times neglect and limited supportive conditions in shelters for refugee women. Community-based activities and building on a woman-to-woman approach, which would increase the skills and agency of women, are essential to create a sense of safety for them. There is also a need to work in tandem with specialised actors and increase the service delivery and technical capacities of public agencies which provide protection services to women and girls.

The wellbeing and needs of **boys and men** are often under addressed given the lack of priority given to their vulnerabilities and challenges, coupled with limited targeted interventions. Structural impediments persist in the access of male refugees to adequate protection solutions (e.g. lack of systematic screening of boys' and men's vulnerabilities in assessments, limited specialised actors with provision of protection services including supporting male survivors of SGBV). There is a need for the targeted assessment of their needs and modes of support in line with input from them, in close collaboration with protection, and generation of integrated intervention by protection, livelihoods, education and legal assistance actors. Lack of registration and being outside of the conventional vulnerability criteria, exacerbated by responsibilities to the care of themselves and their household renders men invisible to assistance schemes and disadvantage them in making use of skills-building activities in place. As a result, this inherently impairs their potential for self-reliance. The sources of information that single men use remain limited to peers and online platforms. In addition to this, single, unregistered males are particularly at risk of legal repercussions and possible deportation.

Other notable underserved groups which are not being adequately reached by services are **LGBTI refugees, sex workers, the elderly, unregistered refugees with life threatening or chronic health issues and people with disabilities** who have differing levels of risk.

The limited number of specialised actors and insufficiency of public tailored-services adversely affects the safe identification and facilitation of access to services of **LGBTI refugees** in Ankara and İstanbul. **The elderlies**, to a certain extent, are visible in health services and are targeted by social assistance programmes, whereas limited dedicated protection services are designed for their wellbeing and which utilise their abilities.

Besides limited access to education and protection, the (lack of) registration status significantly affects refugee communities' (particularly non-Syrians) access to **health services**. Unregistered refugees in health risks are forced to resort to negative coping strategies such as indebteding in return for seeking treatment, not seeking treatment at all, self-medication or taking turns with family members to get treated. Moreover, a lack of registration, coupled with fear of legal sanctions, compounds the concealment of adolescent pregnancies, in that a use of unlicensed clinics by refugee girls and women were raised a number of times in this study. The stretched capacity in public health facilities also hinders effective service provision in hospitals for registered Syrians who reportedly have limited access to interpreters. Inconsistent practices in the issuing of disability health reports have also been raised by participants, with a low rate of disability diagnosis as well as complex objection procedures.

The findings summarised above indicate i) a **critical need to engage with national and local duty-bearers, both at provincial and district levels**, in order to ensure accurate information dissemination on registration under protection schemes for both Syrian and non-Syrian refugees, and ii) **a need for complementary service provision in various sectors including (child-focused) case management, referrals and legal assistance to refugee communities with respect to protection and child protection**. The diverse needs of refugees, prevalent urban poverty experienced at household levels and multi-layered vulnerabilities in Ankara and İstanbul further **call for interagency and inter sectoral cooperation among non-governmental and state actors at district-level whilst advocating for the mainstreaming of all refugees in to existing protection mechanisms**.

## KEY RECOMMENDATIONS

The following section summarises key recommendations made to SCI in line with the findings of this study. It includes proposed actions on strategic approach, interventions and dialogue with stakeholders to ensure long-term solutions for refugees and their self-reliance. A more detailed list of key findings and recommendations are presented at the end of the report. It should be noted that most of these recommendations are already included in SCI' current approach and it is matter of *continuing, deepening or reinforcing* rather than starting.

### Relevant Programmatic Interventions

- Continue and scale up information (i.e. incorporation of information on registration into existing activities, dedicated outreach to unregistered refugees) dissemination on rights and responsibilities as defined under protection frameworks and provide structural assistance to refugees (e.g. legal and financial assistance, case management) for registration.
- Increase service capacity of legal assistance experts via capacity building and experience-sharing on protection topics, in particular child and women protection, and referral pathways as well as on working with gender-sensitive and child-friendly approaches.

- Explore options to develop capacity building schemes ranging from general to more specialised protection awareness for legal experts who engage with refugee communities.
- Increase information dissemination on available local services, eligibility criteria, admission periods and processes for Syrian and non-Syrian refugee communities, advocating for the mainstreaming of non-Syrian refugees into services (e.g. emergency health services, education and skills-building to increase self-reliance).
- Enhance the accessibility of services for different refugee groups by diversifying information access points, i.e. better targeting of community-based information sources, such as engagement in refugees' social circles, mapping of local associations, shops and community leaders, efficient use of social media channels referred by refugees as well as increased community-based activities in households.
- As per the role of SCI, reinforce the focus of addressing the needs of *girls and boys below 18 years old*, and the promotion of protection, respect and fulfilment of children's rights. This includes addressing root causes of child labour and child marriage by dedicated research and combining complementary service provision with efforts of influencing norms and beliefs linked to gender, parenting and child protection issues.
- Expand girls and women's protection activities by engaging in community-based interventions on gender equality and cross-learning/venting sessions (engaging more boys and men), strengthening access to multi-sectoral SGBV services and legal aid in coordination with state actors.
- Adopt stronger gender inclusive approaches by undertaking specific assessment (where applicable with specialised actors) on protection challenges encountered by boys, men and LGBTI community, and thereby generate multi-sectoral interventions on issues pertaining to these groups.
- Further explore different forms of community engagement, ranging from community-based protection mechanisms to community-led initiatives, by engaging both male and female community leaders from host and refugee communities, such as educators, mukhtars, imams, employers and by mapping of local associations and shops in the targeted districts.
- Enhance outreach to girls and women confined to the home, the elderly, men and boys, ethnic refugee minorities and LGBTI refugees through the support of key community actors.
- Continue to undertake flexible programming; namely adequate hours, weekends for protection and skills-building activities, and provide child care support to increase single parents' and women's access. Advocate for same in public education and vocational courses.
- Further develop structured psychosocial activities/adapt existing SCI psychosocial support material to the local needs and context, with a focus on diversity and children's rights awareness, non-violence, and inclusion of all persons (i.e. non-discrimination, disability, gender roles and identity). Do this in order to increase protective factors around refugee and host children and to counter social cohesion and adaptation issues, bullying and exclusion as reported in the wider community and in public schools.
- Support local teachers, counselling teachers and administrations with capacity-building activities, thus enabling them to work with host and refugee children in a gender-sensitive and inclusive approach, as well as facilitating better communication between caregivers and school managements, and also host community caregivers.
- Undertake targeted outreach and provide assistive measures to increase the reach to children with disabilities, child labourers, children at risk of or engaged in child marriage via programmes designed in line with their MHPSS needs.
- Pursue partnerships with specialised actors in addressing social and physical barriers encountered by refugees (in particular children) with disabilities' in their access to services.

- Develop programmes for Early Childhood Care and Development (ECCD) targeting girls and boys under 5 years old with a focus on increasing their healthy development and also for their preparation for entry into schools.

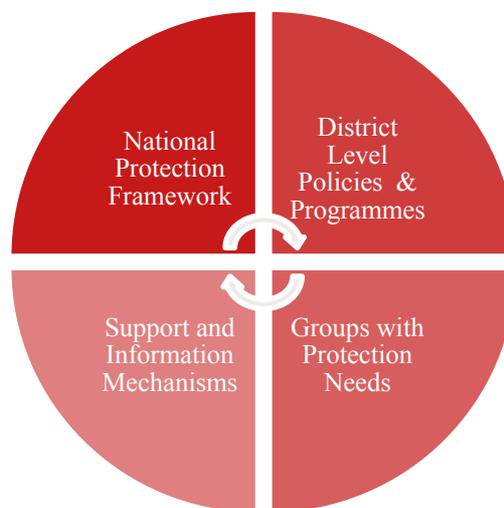
### Complementarity, Coordination and Advocacy

- Pursue continuous coordination and collaboration with district-based service providers, i.e. Social Service Centres, Provincial Directorates of Family, Labour and Social Services, District Directorates of Education, District Directorates of Health, municipalities, NGOs, public schools and Public Education Centres in addressing protection risks pertaining to Syrian and non-Syrian refugees.
- Engage with municipalities and Social Assistance and Solidarity Foundations (SASFs) by clearly depicting the protection risks and service needs of vulnerable refugee communities. Advocate for wider coverage from social assistance and supplementary services for those at risk.
- Generate complementary interventions in coordination and/or partnership with other district-based state and non-governmental actors and aim for holistic service provision in the district which address the rights and needs of children. In particular, provide complementary assistance to refugees who are currently ineligible for social services and assistance. This includes continued *child-centred* protection service provision (e.g. skills-building courses, access to health services, advocacy for access to education, basic needs assistance or social assistance for high risk cases).
- Continuously explore direct support to enhance the capacity of formal child-focused service providers, such as interpretation support, technical assistance and collaboration on case management processes (e.g. two-way referrals, joint assessments, collaboration to execute the case plan and follow-up).
- Maintain update mapping of programs conducted by education, livelihoods, basic needs actors to ensure complementarity and inter-sectoral collaboration for holistic and integrated service provision.
- Undertake regular assessments, protection monitoring on prevalent protection risks and contribute to policy making (i.e. advocacy for the strengthening of local CP response mechanisms) at district-levels.
- Conduct inter-organisational and multi-sectoral assessments to identify longer-term (durable) solutions to protection risks stemming from multi-layered vulnerabilities (i.e. poverty, registration status, information gaps affecting different communities, ages and genders).
- Collaborate with education and livelihoods actors in increasing access to vocational education and skills-building as well as job placement for young women and men.
- Develop activities pertaining to the needs of both refugee and host communities, in particular children, in the targeted districts that would help establish sustainable local response mechanisms to the benefit of refugees as well as the host community at risk.

# SCOPE OF THE STUDY

The Gender-Sensitive Protection Risk and Gap Analysis examines the protection situation of the most marginalised groups of men, women, boys and girls in Ankara and İstanbul to inform future programming by SCI and partners in the targeted districts of Keçiören and Altındağ in Ankara, as well as Ümraniye and Avcılar in İstanbul. Its broader purpose is to define the strategic approaches, interventions and facilitate dialogue with local and national duty-bearers, to promote longer-term and sustainable (durable) solutions for refugee groups.

The study focuses on the legal, social, economic and psychosocial dynamics that have an impact on the protection situation of the most marginalised groups in the districts. It employs a micro-perspective and primarily relies on the experiences and observations of frontline workers from state and non-governmental actors in addition to the experiences of the refugee communities themselves.



In the light of the transition process whereby state agencies are gradually taking over the response to the protection needs of refugees, the PRGA describes the protection environment in the targeted districts in Ankara and İstanbul by answering the overall research question:

- **What strategic approaches, interventions and dialogue with local and national duty bearers should NGOs/civil society pursue, to promote longer-term and sustainable protection solutions for the most marginalised groups?**

Based on the socio-ecological model, the study looks into the national protection framework (i.e. legislation) which regulates the rights and responsibilities of diverse groups (refugees under Temporary or International Protection, unregistered refugees and individuals with residence permits). It further analyses the social environment and district-level policies which have an impact on the protection of refugee communities, community support and information mechanisms, and finally the refugee groups with protection needs.

The table below details the analytical structure of the report:

**Table a. PRGA Analysis Axes**

<b>Section</b>	<b>Sub-analysis content</b>
<b>National Protection Framework</b>	<ul style="list-style-type: none"> <li>• An overview of the national legislation on protection statuses and services.</li> <li>• Laws and policies which regulate access to services and affect protection of refugees.</li> </ul>
<b>District Level Policies and Programmes</b>	<ul style="list-style-type: none"> <li>• District-level policies and programmes in place to prevent and respond to the protection concerns of the most marginalised groups.</li> <li>• Gaps and barriers in service provision in the districts.</li> <li>• Emerging trends in the protection context and service provision at district-level.</li> </ul>
<b>Support and Information Mechanisms</b>	<ul style="list-style-type: none"> <li>• Role of community support mechanisms/networks and information sources on the protection of refugees.</li> <li>• Individual, family and community resources.</li> </ul>
<b>Refugee Groups with Protection Needs</b>	<ul style="list-style-type: none"> <li>• Refugee groups with protection needs in the district.</li> <li>• Social, legal, and economic factors compounding the vulnerability of refugees.</li> </ul>

**Scope and Representation:** The information provided in this report is primarily based on key informant interviews and focus group discussions with refugees and service providers in the targeted districts. It does not represent the experiences of all refugee populations or service providers. It instead sets out an overview of the protection concerns encountered. As such, the findings should be considered as indicative of the protection environment that was studied at a specific time and context.

Given the ever-changing policy and socio-political context in Turkey, the findings in this report may apply at the moment of its finalisation. It should be noted that some of the issues raised in the report might have since been addressed or be changing.

**Terminology:** Acknowledging the diverse legal definitions, namely: asylum seeker, migrant and refugee pertaining to the communities of concern in Turkey, the study refers to all groups as ‘refugees’ irrespective of their origin and registration status.

# METHODOLOGY

## I. Sampling Strategy & Respondent Profile

The study employed a purposive sampling strategy to put forward specific issues which refugees experience in the targeted districts as well as services and gaps and barriers in service provision. To achieve this, the study utilised as primary respondents, frontline workers from service providers in the protection, social assistance, education, legal assistance, livelihoods and health sectors as well as Syrian and non-Syrian refugees themselves. The selection of relevant agencies and informants from refugee communities was undertaken with SCI and Göç-Der teams in separate meetings.

## II. Data Collection

The primary data collection is based on Key Informant Interviews and Focus Group Discussions that were conducted in order to understand the respective district protection environments. In order to present the interrelation between the district-based policies, services and gaps and barriers, secondary data resources were used, namely:

- legislative documents (laws, regulations, decrees) on protection statuses,
- national policy documents,
- reports, assessments, and infographics by non-governmental organisations, UN agencies and by SCI.

The qualitative data collection was undertaken between April and July 2019 over 31 working days following desk research and the development of standardised tools for KIIs and FGDs, targeting service providers, community leaders and individuals from refugees. The tools were developed in an age and gender sensitive manner including different tools for children (9-12 years old), youth (13- 17 years old) and adults (18 years old and older) as well as specific questions focusing on the needs of women, girls, boys and men respectively.

**Table b. Number and Types of Meetings Conducted**

Location	KII with Refugees	KII with Refugee Community Leaders	FGDs with Refugees	KII with Service Providers	Total (per location)
Ankara	4	2	4 <sup>16</sup>	22 <sup>17</sup>	32
Avcılar	6	2	3	5	16
Ümraniye	1	4	4	5	14
İstanbul <sup>18</sup>	0	0	0	10	10
Total (per activity)	11	8	11	42	

<sup>16</sup>1 FGD with children (9-12 years old) is not counted due to low quality of data collected.

<sup>17</sup> Includes 7 semi- structured interviews with UN agencies.

<sup>18</sup>The organisations are not based in Avcılar or Ümraniye however are either knowledgeable about the situation of refugees or extend services to refugees residing in the aforementioned districts via referrals or mobile activities.

In total, 72 meetings took place in the targeted districts with different refugee communities, frontline workers from state, non-governmental organisations and UN agencies. The data collection was conducted in an age and gender-sensitive manner, organising separate sessions for girls, boys, women and men except for two mixed gender FGDs (see below Table c. Breakdown of Focus Group Discussions).

11 FGDs and 19 individual KIIs with refugees as well as 42 KIIs with service providers were conducted. This includes meetings with 10 non-governmental actors in İstanbul who are not based in Avcılar or Ümraniye, but who extend services to refugees residing in these districts.

Three group meetings were undertaken with the SCI and Göç-Der field teams. In these meetings, the key informant questionnaire designed for service providers was utilised. As such these meetings were counted under KIIs as service providers.

In Ankara, Syrian participants from the Altındağ district as well as Afghan and Iraqi refugees from the Keçiören and Altındağ districts were interviewed. In Avcılar and Ümraniye in İstanbul, all refugee participants were Syrians.

### Focus Group Discussions

A total of 11 Focus Group Discussions took place with refugee participants for the study, comprising of 74 individuals.

**Table c. Breakdown of Focus Group Discussions**

Province	District	Nationality	Age	Gender	Number of Participants
Ankara	Keçiören	Mixed (Afghan, Iraqi, Syrian)	13-17 years old	Male	15
	Keçiören	Afghan	13-17 years old	Female	5
	Altındağ	Syrian	Adults	Mixed	5
	Altındağ	Syrian	Adults	Female	7
İstanbul	Avcılar	Syrian	13-17 years old	Male	3
	Avcılar	Syrian	Adults	Female	6
	Avcılar	Syrian	Adults	Female	9
	Ümraniye	Syrian	9-12 years old	Mixed	7
	Ümraniye	Syrian	Adults	Female	4
	Ümraniye	Syrian	Adults	Male	8
	Ümraniye	Syrian	13-17 years old	Female	5

### Key Informant Interviews with Refugees

In total 19 KIIs were undertaken with refugees, out of which 11 (8 women and girls, 3 men and boys) were with individual refugees and 8 (3 women and 5 men) were with refugee community leaders. Of 19 KIIs with refugees, 6 were conducted in Ankara, 8 in Avcılar and 5 in Ümraniye, İstanbul.

**Table d. Breakdown of Key Informant Interviews with Refugees**

KII Breakdown	Gender	Syrian	Afghan	Iraqi	Total
KII with Refugee Individuals	Male	3	-	1	11
	Female	5	2	-	
KII with Refugee Community Leaders	Male	4	-	1	8
	Female	2	1	-	

### Key Informant Interviews with Service Providers

Out of 42 meetings (including 3 meetings with Göç-Der and SCI teams in Keçiören, Avcılar and Ümraniye) undertaken with service providers, the respondents were predominantly from the host community.

**Table e. Breakdown of Key Informant Interviews with Service Providers**

Location	State Actor		Non-Governmental Actor		UN Agencies		Total	
	Host	Syrian	Host	Syrian	Host	Syrian	Host	Syrian
Ankara	1	0	13	1	7	0	21	1
Avcılar	2	0	3	0	0	0	5	0
Ümraniye	2	0	3	0	0	0	5	0
İstanbul	0	0	10	0	0	0	10	0

### Total Numbers, Representation Per Age, Gender and Nationality

In total, the study reached 150 participants, 93 refugees, as well as 57 service providers, 15 of whom are SCI or Göç-Der staff. Overall 62% of respondents were from refugee communities and 38% from the host community (service providers).

Additionally, 75,4% of the respondents were adults, 24,6 % were minors under 18 years old and composed of 20% youth (13-17 years old) and 4,6% children (9-12 years old). 58% of the refugee participants were female and 42% male. Among the minors the gender segregation was 59,4% males and 40,6% females.

Among the refugee communities, the representation as per nationality was 75% Syrian, 15.4 % Afghan, and 9.6% Iraqi.

### III. Procedures

- In the inception period, standardised qualitative tools were designed for the KIIs and FGDs to be used with refugee communities, service providers, community leaders and UN agencies in both Turkish and English. The tools were approved by SCI.
- The consent forms were made available in Farsi, Arabic, Turkish and English.
- All meetings were conducted by the consultant and where necessary, with interpretive support from

the SCI and Göç-Der staff who are fluent in Arabic and Farsi.

- Prior to the meetings, the interpreters were inducted on the scope of the meetings, questionnaires and principles to adhere to during the meetings.
- Gender balance within the interviewer team in the FGDs was adhered to as far as possible.
- Prior to the meetings, the scope of the study and consent forms, including anonymity principles, were explained to each refugee participant with the support of an interpreter and their written consent was then obtained in their native languages.
- For minors, the written consent of parents or legal guardians was obtained before the meetings.
- Oral consent was acquired from the service providers explaining the scope of the study and each participant was assured of full anonymity regarding their contribution.
- During the inception and fieldwork period, weekly Skype meetings were undertaken with SCI to track the progress and challenges encountered in the study.

#### IV. Limitations

- The lack of district and province-based statistical information on different refugee groups, ages and genders is an impediment to establishing a representative picture of the respective protection environments in the districts. The PRGA primarily relied on national-level representative data and the SCI Baseline Assessment conducted in 2018 to provide further context and comparison.
- Field duration of primary data collection was extended in all districts, as the initially assigned number of days was deemed insufficient. Despite the extension and efforts to schedule meetings, a number of service providers refrained from participating due to workload or did not respond to meeting requests.
- Given the limited time frame and human resources, the study prioritised achieving a data collection saturation level with service providers. As such, a saturation level with respect to Focus Group Discussions with refugees was not reached. This was mitigated via individual meetings with refugees including community leaders.
- Conducting focus group discussions with men was very difficult in Ankara and Avcılar partially due to Ramadan and work hours. Individual KIIs with men were prioritised in these locations.
- Given the limited number of non-governmental actors operating in Avcılar and Ümraniye, in order to ensure in-depth data collection, the study reached out to front line workers of NGOs working in neighbouring Esenyurt (for Avcılar) and Sultanbeyli (for Ümraniye) and wider İstanbul who have services extending to the target districts.
- The data collection was undertaken at a time when none of the NGOs based in Ankara had outreach authorisation and only a limited number of NGOs were performing outreach in İstanbul. Consequently, a number of questions, particularly those on community relations and resources, were not answered or answered generically by the frontline workers.
- SCI and Göç-Der staff who are fluent in Arabic and Farsi attended the meetings with refugees in a supportive interpretive capacity. While the approach proved to be useful in understanding the colloquial language, localised references and did indeed help to foster rapport, the engagement and presence of team members may have created a tendency amongst the refugee participants towards focusing on topics and areas in which SCI or Göç-Der provides assistance.
- The scope and aim of the study and also the anonymity principles were explained to the participants, however the depth of questions as well as participation of SCI and Göç-Der staff as interpreters may have inversely affected their frankness, causing some to withhold information particularly on child marriage, child labour and informal work. A similar risk applies to the frankness of frontline workers with respect to gaps and barriers in service provision.

- The interviews with refugees brought forward significant issues particularly around the lack of registration and created a focus on individual problems more so than issues experienced at the community level. To provide a correlated analysis, the results of the interviews with refugees were triangulated with findings from service provider meetings and desk research.
- Given the tendency to focus on individual problems by the refugee respondents, the study chose to conduct less individual KIIs with refugees in Ümraniye (the last field location), and more KIIs with refugee community leaders and FGDs in this location.

# 1. INTRODUCTION

Turkey currently hosts the largest number of refugees in the world, including more than 3.67 million Syrian refugees as well as refugees from Afghanistan, Iraq, Iran and other countries. The emergency response efforts following the onset of the Syria Crisis in 2011 was primarily undertaken by the Disaster and Emergency Management Presidency (AFAD). In time, the amount and diverse needs of the refugee populations, continuous arrivals and internal movements in Turkey paved the way for Government of Turkey to introduce the Law on Foreigners and International Protection (LFIP) (No 6458). Accordingly, a dedicated agency Directorate General for Migration Management (DGMM) under the Ministry of Internal Affairs (MoI) was established to regulate migration management and related policies in 2013. The LFIP and pursuant regulations on Temporary and International Protection defines status determination processes, the rights and responsibilities of refugees and the pursuant services.

In the light of the changing legal framework and the increasing engagement of state agencies in mainstreaming refugees into public service provision, the following section lays out the definition of protection frameworks by the national legislation applicable to refugees in Turkey (i.e. International Protection and Temporary Protection), information on other populations of concern (i.e. individuals with residence permits and unregistered refugees) and also key national stakeholders.

## 1.1 PROTECTION FRAMEWORKS

Under the Law on Foreigners and International Protection (LFIP), three different statuses are defined within International Protection (IP): ‘refugee status’, ‘conditional refugee status’ and ‘subsidiary protection’. Most of the refugees from other than Syria are considered under ‘conditional refugee status’ which applies to “persons unable to return to their home country due to a fear of being persecuted on account of race, religion, political opinion, nationality, membership to a particular social group, or are facing indiscriminate violence arising from a situation of international or domestic armed conflict, or are subjected to the death penalty or torture or inhuman or degrading treatment or punishment in their home country (LFIP, Article 62).”

Turkey maintains ‘geographical limitation’ on the 1951 Convention Relating to the Status of Refugees (Geneva Convention) and its 1967 Additional Protocol. Accordingly, ‘refugee status’ may be granted to individuals who, seek protection as a result of events occurring in European countries, whereas ‘conditional refugee status’ may be granted to asylum seekers originating from countries outside Europe.

### International Protection

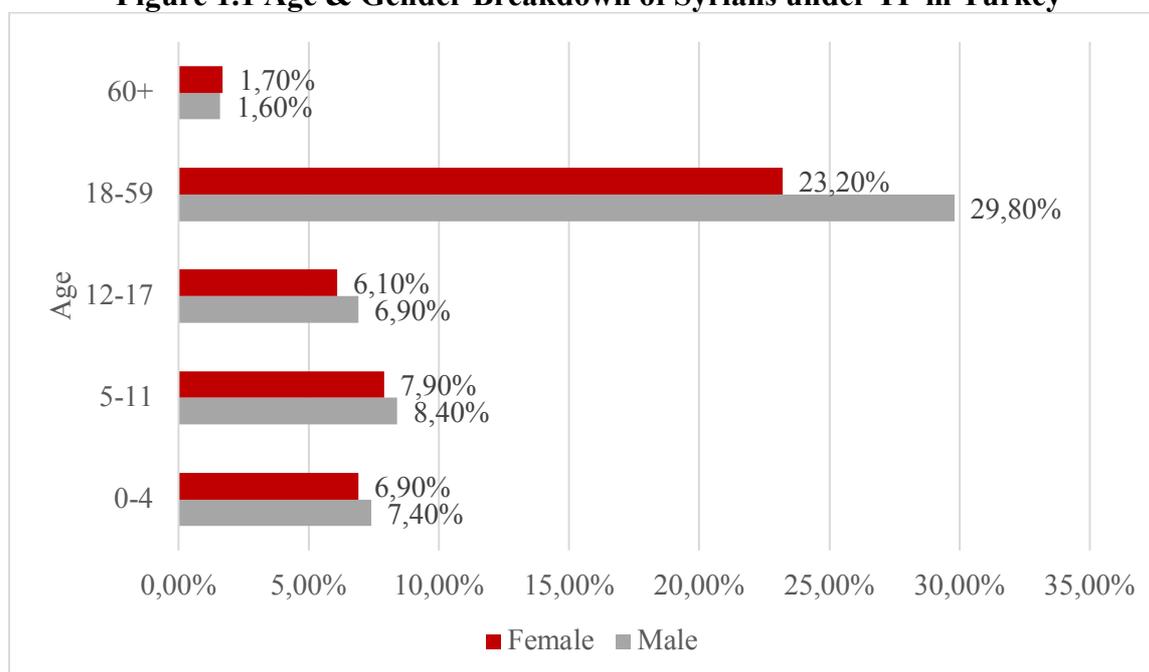
Refugees under IP status and IP applicants are required to register and reside in ‘satellite cities’ while their resettlement and IP applications are processed by Provincial Directorates of Migration Management (PDMM). In Turkey, 48 provinces are designated as satellite cities which do not include İstanbul, Ankara or İzmir. Refugees under IP may, in principle, move residence to İstanbul when this is approved by Directorate General of Migration Management. These moves are allowed under exceptional conditions such as health care provision and for higher education purposes.

According to Directorate General for Migration Management figures, the number of annual **International Protection** applications increased from **8,932 in 2010 to 114,537** by the end of 2018.<sup>19</sup> As of September 2018, **368,400** refugees (170,000 from Afghanistan, 142,000 from Iraq, 39,000 from Iran and 5,600 from Somalia in descending order) are registered with UNHCR<sup>20</sup> in Turkey.<sup>21</sup> **120,000** of registered refugees under IP are estimated to be children.<sup>22</sup>

## Temporary Protection

According to the LFIP, Temporary Protection status is granted to individuals (i) who were forced to leave their country, (ii) cannot return to the country they left, or (iii) arrived at or crossed Turkish borders en masse or individually. Currently, Syrian nationals and stateless persons, as well as refugees from Syria and Palestinians normally resident in Syria, are granted TP status. The scope of Temporary Protection is further detailed under the Temporary Protection Regulation (TPR, 2014) which was last amended in 2018.

**Figure 1.1 Age & Gender Breakdown of Syrians under TP in Turkey**



Source: DGMM, October 2019

Syrians in Turkey seeking protection pursuant to the onset of the Syria Crisis constitute the majority of refugees. As of October 2019, the number of registered Syrians under **Temporary Protection** stands at **3.682, 434 including 552, 080 in İstanbul and 94,836 Syrians under TP in Ankara.**<sup>23</sup> As seen in the table above,

<sup>19</sup>DGMM Migration Statistics, Number of International Protection Applications, accessed via [https://www.goc.gov.tr/icerik3/uluslararasi-koruma\\_363\\_378\\_4712](https://www.goc.gov.tr/icerik3/uluslararasi-koruma_363_378_4712)

<sup>20</sup>UNHCR ended Refugee Status Determination (RSD) duty on 10 September 2018 and handed over the RSD process to DGMM.

<sup>21</sup>UNHCR, Turkey Key Facts and Figures, August 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/71511.pdf>

<sup>22</sup>UNICEF Humanitarian Situation Report Turkey #33, May 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report%20-%20May%202019.pdf>

<sup>23</sup>DGMM Migration Statistics, Number of Syrians under Temporary Protection in Turkey, November 2019, accessed via <https://www.goc.gov.tr/gecici-koruma5638>

the registered Syrian population is young with 43,30% of Syrians between 0-18 years old in need of access to rights and services that are essential to their wellbeing and development.

The LFIP and the Temporary Protection Regulation do not, in principle, restrict the provinces where Syrians are allowed to register under Temporary Protection, however, the legislation indicates that Syrian refugees are *eligible to access services in their province of registration*. It must be noted, certain provinces such as İstanbul and Antalya appear to be stretched in terms of service delivery capacities, and as such there are recent policy developments which de facto restrict provinces where Syrians are allowed to register (for more see Section 1.3 Refugees with Registration Issues).

## 1.2 INDIVIDUALS WITH RESIDENCE PERMITS

Within the scope of this study, addressing the situation of short-term residence permit holders (i.e. Iraqi, Afghan, Syrian individuals and others) and humanitarian residence permit holders (i.e. Iraqi and Afghans, nationals of Turkic countries in Central Asia and others) is of importance. In Ankara and İstanbul where SCI operates, there are refugee communities with different types of residence permits who have limited access to services and assistance due to the fact that residence permits do not provide free/subsidised access to services or facilitate access to assistance in the same way that TP and IP statuses do.

The types of residence permits granted under the LFIP are: (i) short-term residence permits (ii) student residence permits, (iii) long-term residence permits, (iv) family residence permits (v) humanitarian residence permits (vi) residence permits for victims of human trafficking.

The latest figures released by DGMM point to a total of **1.076,030** residence permit holders in Turkey and **552, 050** in İstanbul and **101,865** in Ankara as of November 2019.<sup>24</sup> The breakdown of types and numbers of residence permits issued are published annually. The age and gender disaggregation is not publicly available, however the primary recipients of residence permits by nationality are Iraqis, Syrians followed by the nationals of Turkmenistan. The table below indicates the most updated annual overview for 2018:<sup>25</sup>

**Table 1.2 Number of Residence Permit Holders by Type in Turkey<sup>26</sup>**

Type of Residence Permit	Number
Short-term residence permit	563,093
Family residence permit	75,122
Work permit	85,840
Student residence permit	79,225
Other	53,190

Source: DGMM, October 2019

<sup>24</sup>DGMM, Residence Permits (updated on 7 November 2019), accessed via <https://www.goc.gov.tr/ikamet-izinleri>

<sup>25</sup>Ibid.

<sup>26</sup>The figures on the types of residence permits released annually by DGMM does not cover all the residence permit types stipulated under the LFIP.

## Humanitarian Residence Permits

The LFIP Article 42 stipulates that humanitarian residence permits are issued (i) *where the best interest of the child is of concern; (ii) where, notwithstanding a removal decision or ban on entering Turkey, foreigners cannot be removed from Turkey or their departure from Turkey is not reasonable or possible; (iii) in the absence of a removal decision in respect of the foreigner pursuant to Article 55; (iv) where there is a judicial appeal against the actions carried out pursuant to Articles 53, 72 and 77; (v) throughout the removal actions of the applicant to the first country of asylum or a safe third country; (vi) in cases when foreigners should be allowed to enter into and stay in Turkey, due to emergency or in view of the protection of the national interests as well as reasons of public order and security, in the absence of the possibility to obtain one of the other types of residence permits due to their situation that precludes granting a residence permit; (vii) in extraordinary circumstances.*

The humanitarian residence permit only allows legal residence in Turkey for a one-year period, is in principle renewable at the discretion of respective governorships. It also provides limited access to services - similar to short-term residence permits. The acquisition of humanitarian residence permits has reportedly increased in recent years for refugees with Turkic kinship or origin, namely for Afghans (Uzbek and Turkman origin), Iraqis (Turkmans) and Uighur nationals from the Republic of China.<sup>27</sup> Whilst the exact number of humanitarian residence permit holders is not publicly available, in a separate report, International Organisation for Migration (IOM) indicates that **the ‘other’ category in all residence permits (see Table 1.2 above) also includes the number of humanitarian residence permits.**<sup>28</sup>

### 1.3 REFUGEES WITH REGISTRATION ISSUES

Consultations undertaken with refugees and service providers indicate that the registration problems are ongoing in 2019. The most pressing issue is related to the lack of registration or residence in another province than originally registered in, which limits the level of access to basic services by refugees.

A baseline study conducted in İstanbul by IOM puts the overall number of ‘migrants’<sup>29</sup> at 1.410,635, out of which 897,718 are Syrians, 89,713 are Afghans followed by Turkmans, Uzbeks and Iraqis (in descending order).<sup>30</sup> While the registration status of the population concerned is not detailed in the assessment, a comparison of official figures and the baseline figures shows that the figures highlighted in the baseline are higher. This can be interpreted as a sign that there are groups of unregistered refugees or refugees registered in a different city but residing in İstanbul (both Syrian and non-Syrian), Syrians with registration problems (e.g. delays) and individuals with different residence permits in İstanbul.

#### Refugees under IP status registered in satellite cities but residing in İstanbul or in Ankara

Both İstanbul and Ankara are major destinations for refugees, however in the given legal framework refugees

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<sup>27</sup>NTV News Article, ‘89,951 Humanitarian residence permits have been issued in Turkey’, June 2019, accessed via [https://www.ntv.com.tr/turkiye/suleyman-soyly-89-bin-951-kisiye-insani-ikamet-izni-duzenlenmistir.0um8t\\_OAPE6pFiw4akAyWQ](https://www.ntv.com.tr/turkiye/suleyman-soyly-89-bin-951-kisiye-insani-ikamet-izni-duzenlenmistir.0um8t_OAPE6pFiw4akAyWQ)

<sup>28</sup>IOM, Migrant Presence Monitoring Situation Report, June 2019, accessed via <https://migration.iom.int/reports/turkey-%E2%80%94-migrant-presence-monitoring-situation-report-june-2019>

<sup>29</sup>The term ‘migrants’ is used here as per the IOM report’s terminology.

<sup>30</sup>IOM, Turkey DTM Baseline Assessment Report İstanbul, May 2019, accessed via <https://migration.iom.int/reports/turkey-dtm-baseline-assessment-report-istanbul-province-round-1-october-december-2018>

under International Protection cannot reside in these provinces except for official authorisation by DGMM. Yet, perceived opportunities to earn a livelihood in conjunction with the variety of basic services and assistance, cheap rents in the peripheries, proximity to family members and acquaintances from their countries of origin are among the reasons why refugees under IP status reside in İstanbul and Ankara instead of in the satellite cities. This is aggravated by factors such as limited work options to earn income in satellite cities and potential risk of discrimination. It is estimated there are significant numbers of refugees registered under IP in another province but are residing in İstanbul or Ankara. Yet, they have limited access to services as well as are at risk of losing their rights and entitlements due to the fact that they reside outside of their province of registration (satellite cities).

### Unregistered refugees residing in Ankara and İstanbul

The presence of unregistered refugees in Turkey is recognised by the European Commission through its needs assessment report published in late 2018 and also by the respective policy and interventions undertaken by the Government of Turkey (with respect to İstanbul) explained below. Their exact number is unknown, however unregistered refugees also reside in Ankara and İstanbul due to similar reasons that apply to refugees under IP status. Their lack of registration poses a risk of administrative detention and possible deportation in addition to barriers against accessing basic services namely health, education and access to the formal labour market. This exacerbates protection risks such as child labour, child marriage and deteriorating health, faced with which, the affected refugees may employ to negative coping mechanisms and harmful practices (for further information see Section 5. Refugee Groups in Need of Protection Services).

### Syrians with registration issues residing in İstanbul

The European Commission noted that since 2016 the registration process for the SuTP had become lengthy, complex and selective, with only vulnerable Syrians being registered in a number of provinces including İstanbul.<sup>31</sup> The Commission further revealed, based on independent surveys by IOM and Support to Life (STL), an estimated ratio of Syrians affected by registration challenges in İstanbul as follows: 12% to 17% of Syrians are living unregistered, 10% with pending registration and 12% of Syrians with registration in another province – all unable to access services.<sup>32</sup> NGO frontline workers underlined that during the past year only a marginal number of Temporary Protection Identification Documents (TPID) were granted to Syrians. These include Syrians with chronic health issues, female survivors of violence, pregnant women without ID and, to a very limited extent, for Syrians whose family members are registered in İstanbul. Furthermore these ‘successful’ registrations were evaluated case by case as per their vulnerabilities and without communication of a clearly defined criteria.<sup>33</sup>

### The policy developments on registration in İstanbul

At the time of drafting this report, İstanbul Governorship officially declared the province closed to new Temporary Protection registration. Syrians registered in other provinces as well as those Syrians without registration have been directed to return to their province of registration or to provinces assigned by the two PDMMs in İstanbul by 20 August 2019. The deadline was later extended to 30 October 2019. The

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<sup>31</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>32</sup>Ibid.

<sup>33</sup>PRGA KII Service Provider, İstanbul (25/05/2019), KII Service Provider, İstanbul (07/05/2019)

Governorship issued a list of criteria on exceptions to allowing residence in the province for (i) Syrians with established businesses and their families, (ii) immediate family members of İstanbul-registered Syrians who are themselves registered in different provinces, (iii) children enrolled in primary and secondary school and their families, (iv) Syrians in higher education, (v) and orphaned children in the care of extended families.<sup>34</sup>

The statement issued by the İstanbul Governorship's office on 22 July 2019 also outlined that "efforts to alleviate 'irregular migration' will be continued".<sup>35</sup> According to various news reporting and human rights groups, the policy implications included systematic monitoring and ID checks for non-Syrians and resulted in deportation of unregistered refugees. The Governorship also announced that "between 12 July and 25 August 2019, 16,423 'irregular migrants' (*non-Syrians*) were moved to 'repatriation centres' and processed for 'return' (*to their countries of origin*)."<sup>36</sup>

The policy change affects the lives of unregistered refugees residing in İstanbul, putting them at risk of family separation and deportation, in addition to the ongoing protection risks they face in lack of registration. Whilst it was not possible to capture the overarching impact of the policy change and reflect to this report, it is evident that unregistered refugees as well as Syrians and non-Syrian refugees registered under TP or IP in a different province but residing in İstanbul are in immediate need of legal assistance with respect to following registration processes.

## 1.4 KEY NATIONAL STAKEHOLDERS

In the light of policy and legislative developments with respect to migration management, the GoT assigned key national agencies responsible for the coordination and provision of services in health, education, access to the labour market, social services and social assistance for refugees.

Directorate General of Migration Management (DGMM) under the Ministry of Internal Affairs is responsible for refugee status determination and registration for both IP and TP, as well as preliminary screening of vulnerabilities in course of registration. DGMM undertakes its registration role via Provincial Directorates of Migration Management established in each province<sup>37</sup>. The Ministry of Family, Labour and Social Services (MoFLSS) is designated with responding to and regulating social assistance and protection services for refugees. Additionally, the Ministry of National Education (MoNE), Ministry of Justice (MoJ), Ministry of Health (MoH) and Ministry of Youth and Sports (MoYS), in conjunction with their respective provincial directorates and units, conduct programmes predominantly for the registered refugees. Furthermore, a vice-governor's office is designated to the coordination of refugee related efforts at provincial level.<sup>38</sup>

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<sup>34</sup>İstanbul Governorship Press Release, August 27, 2019, accessed via <http://www.İstanbul.gov.tr/duzensiz-goc-kayitsiz-suriyeliler-kayit-disi-istihdam-basin-aciklamasi>

<sup>35</sup>İstanbul Governorship Press Release, July 22, 2019, accessed via <http://www.İstanbul.gov.tr/duzensiz-gocle-mucadele-ile-ilgili-basin-aciklamasi>

<sup>36</sup>İstanbul Governorship Press Release, August 27, 2019, accessed via <http://www.İstanbul.gov.tr/duzensiz-goc-kayitsiz-suriyeliler-kayit-disi-istihdam-basin-aciklamasi>

<sup>37</sup>In İstanbul, there are two PDMMs, one on the European and one on the Asian side of the province.

<sup>38</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

## 2. THE NATIONAL PROTECTION DEVELOPMENTS IN TURKEY

This section provides an outlook on the national policy developments in regard to protection of refugees in Turkey. It details key legislation and regulations that facilitate refugees' access to basic services. The subsequent sections identify the current situation in relation to accessing basic rights and services and also underline impact of relevant policies and key challenges encountered by Syrian and non-Syrian refugees with respect to their protection and access to services.

### 2.1 PROTECTION SERVICES

#### 2.1.1 Protection Services and Social Assistance

The Ministry of Family Labour and Social Services is the ministerial authority responsible for the provision of assistance to refugees under TP or IP and residence permit holders with special needs and vulnerabilities. The Ministry provides services for women, children, persons with disabilities and the elderly via six Directorates General. It administers social service institutions including nursing and children's homes (*çocuk evleri*), child support centres (ÇODEM), care and rehabilitation centres for persons with disabilities, elderly care centres, family consultancy centres, Social Service Centres, shelters for women, and Violence Prevention and Monitoring Centres.<sup>39</sup>

At the provincial and district-levels, Social Service Centres and Social Assistance and Solidarity Foundations are the primary providers of protection and social assistance services. SASFs provide social assistance including different types of in-kind and financial assistance<sup>40</sup> to vulnerable households based on economic vulnerability. Furthermore, they are a service point for the Emergency Safety and Security Net (for further information see Section 2.4 Basic Needs and Protection) and Conditional Cash Assistance for Education, (CCTE) (for further information see Section 2.5 Education and Protection) which are the most utilised assistance tools by refugees.

The interventions of the Social Service Centres target the host community and registered refugees in their province of registration and, to a limited extent, individuals with residence permits. More specifically, the groups targeted by SSC service provision are children, women, the elderly and persons with disabilities and their immediate families. Services range from counselling; recommending and follow up of precautionary measures (*tedbir kararı*) on education, counselling, health and (child) protection; supportive one-off or periodic financial aid (i.e. Social- Economic Support, home care disability allowance), awareness-raising sessions, and referrals to vocational and language trainings and to other protection mechanisms (e.g. Violence Prevention and Monitoring Centres, shelters for women, Child Support Centres) under the coordination of the respective Provincial Directorate of Family Labour and Social Services.<sup>41</sup>

The Social-Economic Support (SED) provided by SSCs has been extended to registered refugees. The social assistance scheme targets children at risk mainly due to economic hardship experienced at the household level

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<sup>39</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>40</sup>Including allowance for widows, persons with disabilities, veterans, ESN, CCTE, cash assistance for pregnant women and for health, coal aid, assistance for shelter etc.

<sup>41</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

(i.e. drop-out of school, child labour, children at risk of being taken into institutional care) and provides one-off or periodic financial aid to families and single parents in order to improve the living conditions of the child.

Via the Family Social Support Programme (ASDEP), mobile units based in SSCs undertake the identification of protection needs and recommend precautionary measures (education, health, child protection) and interventions.<sup>42</sup> While registered refugees are, in theory, catered for by ASDEP (through mobile outreach) and SSC programmes (walk in), caseloads of ten to fifteen thousand per SSC unit create delays and affect the quality of service provision.<sup>43</sup> This excess results in the sporadic or decreasing regularity of home visits and/or the thorough follow-up of cases.<sup>44</sup>

The state-provided protection and social assistance schemes primarily focus on child and family support, with targeted interventions towards registered refugee children, women, the elderly, and people with disabilities. In this regard, the present services, in effect, exclude **refugees with registration in a different province and unregistered refugees, in addition to single men, some of whom may be LGBTI refugees, even if they are registered.** The latter group's needs are also largely unidentified, due to the lack of gender-identity sensitised criteria during the original screening process and limited service delivery capacity.

The MoFLSS in collaboration with UN agencies works to increase the physical and technical capacities of Social Service Centres and mainstream refugees into public services. In that regard, United Nations High Commissioner for Refugees (UNHCR), United Nations Children's Fund (UNICEF) and United Nations Population Fund (UNFPA) provide funding as well as technical capacity building to SSCs.<sup>45</sup> A number of SSCs have established specific migrant support desks, which included the hiring of social workers, Arabic speaker-interpreters and psychologists and the expansion of ASDEP teams is also planned. The role of NGOs providing complementary support to that which the UN provides to SSCs is increasingly recognised as important, to be coordinated under the umbrella of the inter-agency Social Service Centre Task Force.

Whilst the developments outlined above are commendable, the service delivery capacity of social service actors, primarily SSCs, is still limited by factors of primary focus being the SuTP and lack of dedicated personnel and technical ability to respond to refugees other than Syrians. According to a source, child protection and diversity awareness is still developing among state service providers in the form of response measures to complex protection cases including child labour, child marriage and supporting LGBTI refugees.<sup>46</sup> **It is worth noting that, while the structural developments enable registered refugees to access social assistance and protection services to a certain extent, unregistered refugees (including Syrians and non-Syrians) and those with registration in a different province cannot make use of the services explained above. Girls and boys under 18 are often ending up at risk as a result, with concerns ranging from school drop-out to child labour and child marriage.**

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<sup>42</sup>MoFLSS, ASDEP Programme, accessed via <https://ailevecalisma.gov.tr/ss/aile-ve-toplum-hizmetleri-genel-mudurlugu/asdep/>

<sup>43</sup>PRGA KII Service Provider, Ankara (17/05/2019)

<sup>44</sup>PRGA KII Service Provider, İstanbul (29/05/2019)

<sup>45</sup>PRGA KII Service Provider, Ankara (17/05/2019)

<sup>46</sup>Ibid.

## 2.1.2 Legal Aid and Assistance

In Turkey, the legal framework that enables the access of refugees to legal assistance and aid is stipulated under the LFIP (Article 82) and the Turkish Bar Association Legal Aid Regulation (2004 /No 25418). Refugees in need are entitled to legal aid (*adli yardım*) which refers to assignment of a lawyer free of charge by the Bar Associations (BAs). Some Bar Associations such as the Ankara BA have further established dedicated units namely Refugee Rights Commissions/Centres. UNHCR, in conjunction with Refugee Rights Turkey works with the Union of Turkish Bar Associations (UTBA) by supporting judges and lawyers in capacity building on refugee and humanitarian law and the national protection frameworks on IP and TP as well as dissemination of good practices among Bar Associations.<sup>47</sup>

Legal assistance includes the provision of legal advice and assistance by a lawyer to a beneficiary concerning his/her specific legal circumstances and the follow-up of legal procedures with official authorities, (Attorneyship Law No.1136) A number of non-governmental organisations including those in Ankara and İstanbul support refugees via provision of legal assistance. They do not, however, have the mandate to provide legal representation. A broader reach and quality of legal assistance provision by non-governmental organisations is critical. A number of legal experts who participated in this study outlined the complexity of cases that require further knowledge and experience-sharing in international humanitarian law, refugee law and Syrian Civil Law (the latter for cases mainly to do with marriage or divorce, having implications for children.) They further underlined the need to developing understanding on protection mechanisms including child protection, sexual and gender-based violence, women's protection as well as referral pathways to state service providers.<sup>48</sup>

Despite the aforementioned developments which point to an increased service delivery capacity on legal assistance and aid to refugees, the legal aid funding allocated to the BAs from the state budget is not sufficient. The limitations in funding have resulted in a shortage of lawyers and a lack of supplementary support in such important areas as interpretation services for refugees. According to a recent report by Refugee Rights Turkey, the limited legal aid budgets impede sufficient legal service provision to refugees in provinces with a high density of refugees. These provinces include Şanlıurfa, Gaziantep and Hatay. Adequate legal service provision also suffers in metropolitan provinces (e.g. İstanbul and Ankara).<sup>49</sup> These areas have large 'removal and detention centres' and, as a result, refugees there with different registration statuses and issues may require immediate legal support

Additionally, persistent gaps remain in consistent guidance on administrative processes to follow in notaries, affecting both Syrian and non-Syrians. Also observed is a lack of interpreters that can facilitate communication with both notaries and Bar Associations. To that end, the complementary support by NGOs to provide interpretation assistance and also facilitate the accompaniment of refugees to court procedures and with civil documentation needs, plays an important role to meet immediate needs.

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<sup>47</sup>UNHCR, Strengthening Legal Protection and Access to Justice Note, August 2018, accessed via <https://www.unhcr.org/tr/wp-content/uploads/sites/14/2018/09/04.-UNHCR-Turkey-Strengthening-Legal-Protection-and-Access-to-Justice-Fact-Sheet-August-2018.pdf>

<sup>48</sup>PRGA KII Service Provider, Avcılar, İstanbul (02/05/2019), KII Service Provider, Keçiören,Ankara (25/04/2019)

<sup>49</sup>Refugee Rights Turkey, Access to State Funded Legal Aid Services: Opportunities and Challenges, 2019, accessed via <https://www.mhd.org.tr/images/yayinlar/MHM-74-EN.pdf>

### 2.1.3 Women's Protection

The Law to Protect Family and Prevent Violence Against Women (No 6284) is the main legislation to address the protection of women Turkey. The law was drafted based on commitments to The Convention on Preventing and Combating Violence against Women and Domestic Violence (The İstanbul Convention 2011) and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) in consultation with stakeholders, including some grassroots women's movements. The ratification of the law in 2012 is considered a milestone in the protection of women in Turkey despite the gender-neutral language and references to preservation of the family in its content.<sup>50</sup>

The Violence Prevention and Monitoring Centres (ŞÖNİMs) that have been established based on Law 6284 aim to provide comprehensive guidance and rehabilitation services to survivors and those at risk of violence, as well as to coordinate referrals to women's shelters. In principle, an internal directive issued by the MoFLSS allows the admission of registered refugee women and girl survivors of violence to shelters and ŞÖNİMs, whilst unregistered women and girls need to go through ID verification and registration to be admitted. This in itself constitutes a challenge.<sup>51</sup> Institutional barriers and complex administrative pathways, as well as the level of support available in shelters and ŞÖNİM negatively affects the use of these mechanisms by refugee women. In addition, women's-rights activists point to difficulties in the referral of refugee women to ŞÖNİM, outlining that rigorous advocacy on the part of the women is required to ensure admission.<sup>52</sup> Refugee women, on average, stay in shelters for a short period of time, which, according to a service provider is considered to be a few days.<sup>53</sup> Limited empowerment activities and language barriers are major factors which impede refugee women in making use of the protection mechanisms in place or cause their short duration of stay in shelters.<sup>54</sup> (For more on specific challenges noted in access to protection mechanisms, see Section 5.3. Women and Girls).

## 2.2 CHILD PROTECTION

The Child Protection Law (No 5395) regulates measures to protect children. According to the law, children in need of protection are defined as 'those whose physical, mental, moral, social or emotional development and personal safety is in danger, who are neglected or abused, or who are victims of crime'.<sup>55</sup> Child protection response in Turkey falls under the remit of the Ministry of Family, Labour and Social Services MoFLSS). The operationalisation of relevant measures on child protection is shared among various national stakeholders. This includes MoFLSS in ensuring overall protection, and prevention of/response to neglect, abuse, exploitation of children, the Ministry of Health in relation to child abuse and substance addiction, the Ministry of Justice for children who are victims of crime and are in conflict with the law, and the Ministry of Education in performing education policies and measures.

The provincial key actors are Social Service Centres and Child Monitoring Centres (CMCs) who take on the identification and response to child neglect, abuse and exploitation as well as children's homes (*çocuk evleri*)

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<sup>50</sup>Ekmek ve Gül News Portal, '6284 Sayılı Şiddetle Mücadele Yasası Neden Hedefte?', 2017, accessed via <https://ekmekvegul.net/gundem/6284-sayili-siddetle-mucadele-yasasi-neden-hedefte>

<sup>51</sup>MoFLSS, Directive on Foreign Survivors of Violence Against Women and Girls.

<sup>52</sup>PRGA KII Service Provider, İstanbul (15/05/2019), KII Service Provider, İstanbul (28/05/2019)

<sup>53</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>54</sup>PRGA KII Service Provider, İstanbul (15/05/2019)

<sup>55</sup>Interagency Guidance Note on Child Marriages, 2018.

and Child Support Centres (ÇODEM) that provide shelter and development activities for children taken into institutional care. Child protection issues pertaining to child labour and marriage and their impact on refugee children are further detailed below.

## 2.2.1 Child Labour

Despite the legislative measures and efforts in place, child labour remains a prevalent issue in Turkey. Article 50 of the Constitution of the Republic of Turkey states, “No one may be required to perform work unsuited to his age, sex, and capacity.” According to Article 71 of the Labour Law (No 4857), it is prohibited to employ children who have not completed the age of 15. However, children who are 14 and have completed compulsory primary school can be employed in light work that will not impede their physical, mental, social and moral development, or their continued education.<sup>56</sup> Turkey has further ratified the United Nations Convention on the Rights of the Child (UNCRC), the International Labour Organisation (ILO) Minimum Age Convention No.138 and ILO Convention No.182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

The latest in-depth analysis on child labour in Turkey was conducted in 2012 and is not representative of the working patterns of host community children in 2019, nor of refugee children. According to the Child Labour Force Survey (2012), 5.9% of children between 6-17 years old work primarily in the agriculture, service and industry sectors. 292,000 children who are 6-14 years old and 601,000 children who are 15-17 years old are employed.<sup>57</sup> The ratio of boys within the numbers of employed children was 68.8%, while it was 31.2% for girls with no gender breakdown available as per age.<sup>58</sup> The rate of participation in the child labour force in the 15-17 age group<sup>59</sup> increased from 20.3% to 21.1% in the period 2017 to 2018.<sup>60</sup>

The National Programme on the Elimination of Child Labour (2017-2023) provides further information on the drivers that push children in to work. The majority of children work to either to contribute to household income or help economic activity (70,1% combined) followed by 15,2% working to learn a skill to gain profession.<sup>61</sup> The national programme also points to an increase in domestic work from 43% to 50.2%<sup>62</sup> indicating children are assuming caretaker responsibilities at home, and not only as child labour to generate an income. The numbers of children who attend school and work at the same time increased by 64% between 2006-2012.<sup>63</sup>

Whilst information on the working conditions of refugee children is limited, especially regarding those in urban settings, according to WFP the rate of refugee boys working in Turkey stands at 28%.<sup>64</sup> Understanding child labour patterns in Syria may shed light on the drivers that push refugee children into work and areas of work they might be exposed to in Turkey. ILO’s 2012 study on the worst forms of child labour in Syria indicates that most child labour is found in rural areas of Syria and is focused on the service sector, industry,

<sup>56</sup>Save the Children International & INGEV, Child Rights Situation Analysis, 2018.

<sup>57</sup>Turkstat, Child Labour Force Survey 2012, released in 2013 accessed via <http://www.turkstat.gov.tr/PreHaberBultenleri.do?id=13659>

<sup>58</sup> Ibid.

<sup>59</sup>While the percentage of working boys increased from 28,5 % to 30%, for girls remained at 11,8%

<sup>60</sup>Turkstat, Statistics on Child 2018, accessed via <http://www.turkstat.gov.tr/PreHaberBultenleri.do?id=30708>

<sup>61</sup>Ibid.

<sup>62</sup>Ibid.

<sup>63</sup>DISK, Türkiye’de çocuk İşçiliği Gerçeği Raporu (Reality of Child Labour in Turkey), 2015, accessed via <http://disk.org.tr/2015/04/disk-ar-turkiyede-cocuk-isciligi-gercegi-raporu-2015/>

<sup>64</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

agriculture, begging on the streets, garbage collection and sexual exploitation. Whilst the working ages encountered were as low as 9-10, child labour is more prevalent among boys, whose exposure to work increases with age; whereas girls' employment is concentrated in the younger age categories and decreases as they grow older. Child labour for boys is concentrated in urban settings while it is the opposite for girls, who are more likely to work in rural areas.<sup>65</sup>

In Turkey, refugee children in metropolitan cities are more likely to work in medium-sized industries and informally in small enterprises.<sup>66</sup> These enterprises are mainly in the areas of textile and manufacturing, but children are also to be found working daily in small shops and engaged in street work such as collecting garbage and paper. The findings of this study point to a decreasing working age among refugee children for both boys and girls. High levels of poverty – exacerbated by the aforementioned registration issues among some – negatively impact on enrolment in school, causes school drop-out and drives children into work, where they are 'preferred' as cheap labour by employers.

With the National Programme on the Elimination of Child Labour (2017-2023), the Government of Turkey acknowledges that refugee children are at risk of child labour. Therefore, the programme's policies and measures do, in principle, target all children without discrimination.<sup>67</sup> While particular reference is attributed to Syrians under Temporary Protection in the document, the interventions should extend to all refugees, irrespective of their place of origin and registration status in Turkey. To that end, some SSCs have mobile child labour task forces in charge of identification of child workers and referrals to CP mechanisms.<sup>68</sup> UNICEF has provided training to 90 MoFLSS labour inspectors on the Children's Rights and Business Principles,<sup>69</sup> in addition to trainings for newly established Provincial Child Labour Prevention Units in six provinces<sup>70</sup> in the first half of 2019.<sup>71</sup> The incorporation of the Children's Rights and Business Principles at district-level (with small and medium scale enterprises) would also be an additional relevant measure in targeting employers at local levels. That being said, at present the response efforts against child labour at province and district-levels appear to remain scattered across agencies and sufficient support by the primary agency, the SSC, is limited due to is already stretched in service capacity.

## 2.2.2 Child Marriage

Child, early and forced marriage are all types of gender-based violence and are acknowledged to hinder progress towards the empowerment of women and girls.<sup>72</sup> Although there is no clear definition of child marriage in the national legislation, according to the Turkish Civil Code (No.4721) Article 124, the legal age for marriage is 18. Children who have not yet completed 18 years of age are legally prohibited from marriage. Yet, in exceptional circumstances, children who are 17 years of age may be married with the permission of

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<sup>65</sup>ILO & UNICEF, National Study on Worst Forms of Child Labour in Syria, 2012, accessed via [https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms\\_204043.pdf](https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_204043.pdf)

<sup>66</sup>PRGA KII UNICEF (17/05/2019)

<sup>67</sup>National Programme on the Elimination of Child Labour (2017-2023), 2017, accessed via [https://www.ailevecalisma.gov.tr/media/1321/cocukisciligimucadele\\_2017\\_2023\\_en.pdf](https://www.ailevecalisma.gov.tr/media/1321/cocukisciligimucadele_2017_2023_en.pdf)

<sup>68</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>69</sup>For more on Children's Rights and Business Principles, see <https://childrenandbusiness.org/>

<sup>70</sup>Eskişehir, Bursa, Manisa, Konya, Ankara and Adana.

<sup>71</sup>UNICEF, Humanitarian Situation Report #34, 2019, accessed via [https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report\\_Mid-Year%202019.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report_Mid-Year%202019.pdf)

<sup>72</sup>Interagency Guidance Note on Child Marriages, 2018.

their legal guardians, and those who are 16 years of age may be married in exceptional situations through a court order.<sup>73</sup>

An amendment introduced in 2016 to the Civil Law enables some of the provincial and district muftis – official Muslim cleric public servants who provide opinion on religious matters – to conduct official marriage ceremonies. The muftis are subject to the authorisation of the Ministry of Internal Affairs in order to conduct marriage ceremonies. According to women’s rights activists, the ratification of the amendment poses a further threat to women and girls at risk of early, forced and child marriage which are open to being “legitimised” under the auspices of state and religious authorities.<sup>74</sup>

UNICEF estimates that 1% of host community children in Turkey are married by the age of 15 and 15% by the age of 18.<sup>75</sup> Child marriages decreased from 5.8% in 2014 to 3.8% by 2018 for girls from the host community.<sup>76</sup> However, this statistic represents the rate of official/registered marriages for 16 and 17-year-old girls whilst it is widely acknowledged that child marriages also take place for children under 16 years old and mostly remain unofficial.

The data at hand sheds some light on the prevalence of child marriage affecting refugee children and also points to its concealment in Turkey. The World Food Programme reports that 9% of refugee households married off children under 16 years of age in 2018 in Turkey.<sup>77</sup> On the other hand, the pre-displacement rate of child marriage for girls in Syria was 12% and is estimated to have increased to 26% in the Middle East and Northern Africa (MENA) region after displacement.<sup>78</sup> This difference between the estimated MENA figures 26% versus 9% in Turkey may point to the very real fear among refugees of legal repercussions and a consequent low rate of disclosure of child marriages in Turkey.

In the case of refugee girls, an increasing number of adolescent pregnancies appear to be hidden, given that health professionals are required to report pregnancies to state authorities in Turkey.<sup>79</sup> Field consultations indicate that adolescent girls lack care and treatment or are forced to seek treatment in unhealthy, unlicensed clinics, further endangering their lives.<sup>80</sup> A study conducted by UN Women in Jordan found that the economic hardship experienced by Syrian refugee households, the continuation of traditional practices and safety concerns for children are core drivers for caregivers to resort to marrying off children.<sup>81</sup> Similar factors were raised by refugee respondents on the causes of child marriage in Ankara and İstanbul during the course of this study, with primary concerns being around financial and physical safety for both boys and girls.

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<sup>73</sup>Interagency Guidance Note on Child Marriages, 2018.

<sup>74</sup>Evrensel New Portal, 2017, ‘Kadınlar ‘Müftülük yasası geri çekilsin’ diyor’, accessed via <https://www.evrensel.net/haber/335668/kadinlar-muftuluk-yasasi-geri-cekilsin-diyor>

<sup>75</sup>UNICEF, State of the World’s Children Report, 2017, accessed via [https://www.unicef.org/publications/files/SOWC\\_2017\\_ENG\\_WEB.pdf](https://www.unicef.org/publications/files/SOWC_2017_ENG_WEB.pdf)

<sup>76</sup>Turkstat, Statistics on Child 2018, accessed via <http://www.tuik.gov.tr/PreHaberBultenleri.do?id=30708>

<sup>77</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

<sup>78</sup>Brookings Institute, Forced Displacement and child Marriage: A Growing Challenge in MENA, June 2019, accessed via <https://www.brookings.edu/blog/future-development/2019/06/19/forced-displacement-and-child-marriage-a-growing-challenge-in-mena/>

<sup>79</sup>UNFPA, ‘In Turkey Refugee Child Marriages Drive Adolescent Pregnancies Underground’, 2018, accessed via <https://www.unfpa.org/news/turkey-refugee-child-marriages-drive-adolescent-pregnancies-underground>

<sup>80</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>81</sup>UN Women, Inter Agency Assessment: Gender Based Violence and Child Protection Among Syrian Refugees in Jordan, with a Focus on Early Marriage, 2013, accessed via [http://jo.one.un.org/uploaded/publications\\_book/1458653027.pdf](http://jo.one.un.org/uploaded/publications_book/1458653027.pdf)

## 2.3 LIVELIHOODS AND PROTECTION

The refugees' right to work is regulated under i) Regulation No 29695 on Work Permit of Applicants for International Protection and those Granted International Protection and ii) Regulation No 29594 on Work Permit of Foreigners under Temporary Protection. In principle, a registered refugee is eligible to apply for formal work. On the other hand, the application procedures and limitations below pose challenges in accessing the formal labour market:

- Refugees are allowed to work formally after 6 months from the date of issue of their IDs.
- A work permit application must be initiated by the employer.
- The work permit is valid only for the specific job offered in the province of registration.
- The work permit cannot extend beyond the ID expiry date of the person under TP or IP.
- Refugees employed in an enterprise cannot exceed 10% of the overall number of employees.
- Certain professions are reserved for Turkish citizens such as dentist, patient care personnel including doctors and nurses, pharmacist, attorney, judge and prosecutor.

The conditions above result in the underutilisation of skilled labour and impede much required labour mobility which is essential to self-reliance of refugees. The IP applicants are further disadvantaged as they are required to renew their IDs and consequently their work permits every six months.

As of February 2019, a total of 60,400 work permits have been issued to Syrian nationals, of which 38,289 were granted to Syrians under TP, with the rest to Syrian nationals with residence permits.<sup>82</sup> A job placement expert stated that higher levels of qualification and/or prior experience renders Syrians with residence permits more 'suitable' for mid-level white collar jobs, whereas creating formal job opportunities for Syrians with TP, who are often sought for low-skilled jobs, remains a challenge.<sup>83</sup>

Syrians under TP have gradually managed to access some work opportunities, as can also be seen in the following figures<sup>84</sup>; however, the access to formal and reliable work remains a problem:

- 86 per cent of the households report having a working family member;
- Only 2 per cent of working refugees are formally employed;
- 71 per cent of the households are unable to access skilled or reliable work.

Whilst there is limited information on the formal employment rate of non-Syrians, employment chances are grim for refugees under IP due to limited work opportunities in satellite cities, the cost of work permits (approximately 2.5 times of refugees with TP) and the unwillingness of employers to formally hire foreigners. The current job market often requires refugees to accept low-skilled and low-paid jobs in order to survive. A WFP survey comparing the work conditions of Syrian and non-Syrian refugees between their home countries and Turkey noted that the numbers of adults who worked in semi-skilled and skilled jobs declined, while those

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<sup>82</sup>TRC& WFP Refugees in Turkey, Livelihood Survey Findings Livelihoods Survey, 2019, accessed via [https://reliefweb.int/sites/reliefweb.int/files/resources/Refugees%20in%20Turkey\\_Livelihoods%20Survey%20Findings\\_TRC\\_WFP\\_2019.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/Refugees%20in%20Turkey_Livelihoods%20Survey%20Findings_TRC_WFP_2019.pdf)

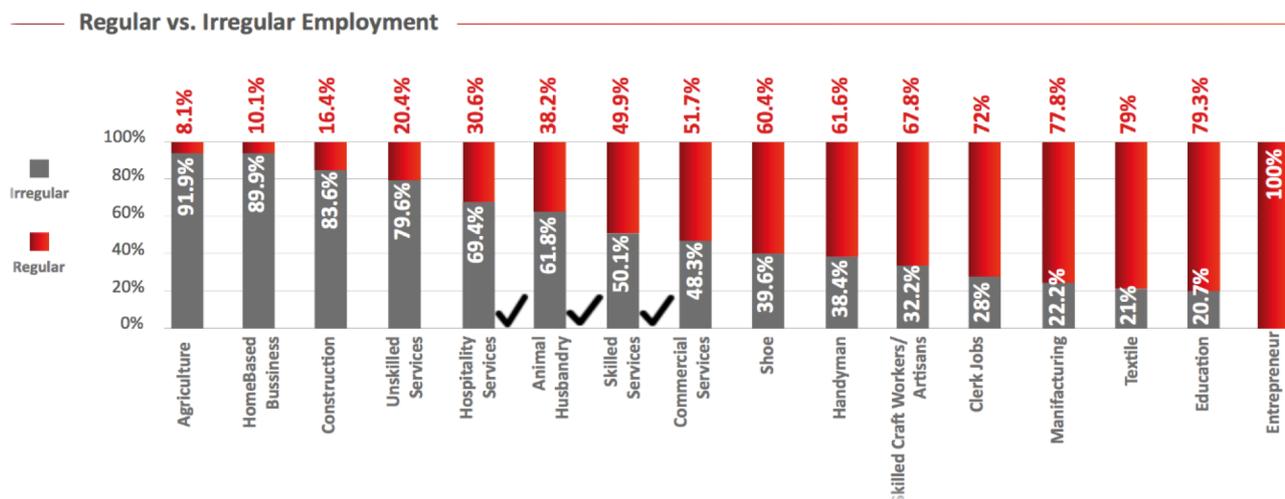
<sup>83</sup>PRGA KII Service Provider, İstanbul (09/07/2019)

<sup>84</sup>WFP, Livelihoods Survey, Early Results Presentation, July 2018 and Comprehensive Vulnerability Monitoring Exercise, May 2019.

in unskilled labour increased from 61% to 69% in Turkey.<sup>85</sup>

A recent study conducted by the Turkish Red Crescent (TRC) among Emergency Safety and Security Net (ESSN) Programme beneficiaries and applicants (including Syrians, Afghans, Iraqis and others) reveals work regularity and sectoral engagement of refugees in the labour market. Accordingly, most prominent work areas in urban settings such as construction and unskilled work are among most irregular work areas. Arguably, these cannot serve to the economic self-reliance of refugee households in Ankara and İstanbul:

**Figure 2.3 Regularity of Work Patterns Among Refugees<sup>86</sup>**



Source: Turkish Red Crescent Livelihood Survey Findings, March 2019.<sup>87</sup>

Despite incentives such as a decrease in work permit fees for the SuTP (while fees for refugees under IP remained the same) and allowing employers to hire a foreigner provided that no Turkish citizen with an equal skill set can be found for the position in four weeks, formal employment rates remain low for refugees.<sup>88</sup>

The European Commission notes that, according to organisations that collaborate with businesses, many host community employers express concerns about the poor Turkish language skills, lack of occupational skills and an ‘incompatible work culture’<sup>89</sup> among some Syrian refugees.<sup>90</sup> However, it is widely acknowledged that refugees often are seen as a source of flexible and cheap labour. While working in the informal economy, there is no insurance or compensation following an incident at the workplace available to refugees. Factors such as language barriers, inefficiency of placement systems and a lack of understanding and/or will of employers to register employees under the social security system hinders the integration of refugees to the formal labour market.

The economic downturn that the Turkish economy is going through since 2018 hinders the chances of employment for all. With an overall unemployment rate of 13,9% and 27.1% for young people (15-24 years

<sup>85</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

<sup>86</sup>WFP, Livelihoods Survey, Early Results Presentation, July 2018 and Comprehensive Vulnerability Monitoring Exercise, May 2019.

<sup>87</sup>No gender/age segregation was provided to the study; thus, the ratio of male and female respondents is unknown.

<sup>88</sup>PRGA KII Service Provider, Ankara (13/05/2019)

<sup>89</sup>The perception of incompatible work culture has not been further elaborated on in the report.

<sup>90</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

old), participation in the informal economy increased to 36 % in July 2019.<sup>91</sup> This will arguably have a detrimental impact on refugees, pushing them further into the informal economy and expose them to exploitative conditions.

### 2.3.1 Women's Access to Livelihoods

Limited language skills and education levels, social and gender norms (i.e. home care responsibilities, social norms in the community that serve to impede women's employability) and a lack of systematic support such as childcare services, targeted skills-building and job placements for women compound the barriers to the access of refugee women to the labour market. A UN Women and Association for Solidarity with Asylum Seekers and Migrants (ASAM) study indicates that 15%<sup>92</sup> of Syrian women take part in regular or irregular work in many cities.<sup>93</sup> However, most women do so informally, mainly working in the agricultural-sector in south-east Turkey. Syrian women also suffer from barriers against entry to the formal economy. By the end of 2018, only 9% of work permits granted to Syrians were for women.<sup>94</sup>

Whilst there is limited information on the working patterns and opportunities for non-Syrian women, Afghan women are disadvantaged by such factors as their lack of registration, significantly low literacy rates (81% versus 28% of the average illiteracy rate among all refugees<sup>95</sup>) and socially constructed norms and responsibilities attributed to women in the household.

Female heads of households (20% of all households)<sup>96</sup> have to make extra efforts to ensure their welfare and protection such as seeking assistance, working mostly in the informal economy, and sharing housing with extended family. Almost three quarters (70%) of the female heads of households in Turkey have no formal education.<sup>97</sup> Female-headed households are also at a higher risk of vulnerability compared to male-headed households. For example, female-headed households have a higher proportion of sick children compared to male-headed households- almost double for under five years old (58% vs 30%), and their children are more susceptible to absenteeism (41% in female-headed households versus 37% in male-headed households).<sup>98</sup>

Despite these barriers and aforementioned vulnerabilities, refugee women in urban settings such as Ankara and İstanbul seek opportunities for income generation. The rate of refugee women's employment – i.e. formal and informal participation in the labour market in İstanbul is noted by the World Food Programme (WFP) as 16% compared to 5% in other areas of Turkey.<sup>99</sup> This is partially related to a higher cost of living in metropolitan cities, which also offer more work opportunities, in addition to a (possibly) higher rate of education and/or qualifications among the refugees who live in İstanbul.

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<sup>91</sup>Turkstat Labour Force Statistics, July 2019, issued in October 2019, accessed via <http://tuik.gov.tr/PreHaberBultenleri.do?id=30687>

<sup>92</sup>The age breakdown is not available.

<sup>93</sup>UN Women & ASAM, Needs Assessment of Women and Girls Under Temporary Protection in Turkey, 2018, accessed via [http://sgdd.org.tr/wp-content/uploads/2018/08/The\\_Needs\\_Assessment\\_ENG\\_WEB.pdf](http://sgdd.org.tr/wp-content/uploads/2018/08/The_Needs_Assessment_ENG_WEB.pdf)

<sup>94</sup>UNHCR Livelihoods Sector Gender Thematic Dashboard, 2018, accessed via <https://reliefweb.int/report/turkey/turkey-livelihoods-sector-gender-thematic-dashboard-2018-summary>

<sup>95</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

<sup>96</sup>Ibid.

<sup>97</sup>Ibid.

<sup>98</sup>Ibid.

<sup>99</sup>Ibid.

## 2.4 BASIC NEEDS AND PROTECTION

Following the downturn in the Turkish economy, the Minimum Expenditure Basket for refugees increased to 351 Turkish Lira (TRY) in 2019. Annual inflation was recorded as high as 20% and food inflation at over 30% by the end of 2018.<sup>100</sup> Whilst the economic situation has shown indications of improvement, the unemployment rates still remain high and the cost of living has drastically increased for both refugees and the host community.

Approximately 46% of refugees in Turkey are living below the poverty line and 10% are living in extreme poverty,<sup>101</sup> while 28% of male children have to work in order to contribute to the family income.<sup>102</sup> In the light of rising living costs in Turkey, particularly since the 2018 economic downturn, the ability of refugees to meet their basic needs is diminishing. Barriers to accessing regular income via formal work or regular financial and in-kind assistance, high rates of borrowing, children dropping out of school in favour of unsafe jobs in the informal economy and moving to the peripheries of cities are common coping strategies employed by refugees. The Emergency Safety and Security Net (ESSN) Programme led by MoFLSS, WFP and Turkish Red Crescent (TRC) is a multipurpose, unconditional cash transfer programme and provides individuals who possess a TP or IP Identification card or humanitarian residence cash transfers of 120 TRY/month. The eligible individuals are identified based on the following criteria:<sup>103</sup>

- Single adult females with no other people in the family,
- Single parents with no other adults in the family and at least one child under 18,
- Elderly people, 60-years-old or above, with no other adults in the family,
- Families with one or more members with a disability (disability rate of 40% or more, as evidenced by a disability health board report issued by an authorised state hospital),
- Families with four or more children,
- Families that have a high number of dependents (i.e. children, elderly people and persons with a disability). This is classified as being families that have at least 1.5 dependents for every able-bodied adult between 18 and 59 years old.

The ESSN currently covers 36% of the registered refugee population in Turkey (approximately 1.7 million individuals).<sup>104</sup> 88.3% of the ESSN beneficiaries are Syrians, followed by 8% Iraqis and 2.8% Afghans. The remainder come from other countries including Somalia and Iran.<sup>105</sup> 24,467 (9%) eligible households include at least one family member with a disability.<sup>106</sup> However the issues faced by refugees in obtaining the disability reports should be kept in mind, due to language barriers and complex objection procedures.

A presentation made to the ESSN Task Force in February 2019 by the Turkish Red Crescent indicated that the

<sup>100</sup>WFP ESSN Monitoring Report, Quarter 4, 2018.

<sup>101</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

<sup>102</sup>Ibid.

<sup>103</sup>Turkish Red Crescent, ESSN Criteria, accessed via <http://kizilaykart-suy.org/EN/faq4.html>

<sup>104</sup>WFP County Brief, August 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/2019%2008%20Turkey%20Country%20Brief%20%20August.pdf>

<sup>105</sup>WFP ESSN Monitoring Report, Quarter 4, 2018.

<sup>106</sup> Ibid.

eligibility rate for households in İstanbul was 49,79%.<sup>107</sup> As of late 2018, in order to address the registered refugee population who do not meet the criteria but are in grave need, the Social Assistance and Solidarity Foundations pilot a ‘discretionary allowance’ for ineligible households following renewed assessment (5% of allocated funding to the SASF to be utilised at their discretion).<sup>108</sup> The allowance provides an alternative entry point to the ESSN for the most vulnerable refugees. It must be noted the usage of the discretionary allowance is left to each SASF,<sup>109</sup> consequently the use of the allowance may not be standard procedure across the country.

The ESSN is considered a regular, reliable income source to cover basic needs amongst registered refugees – at the same time it is often reported among refugees in İstanbul (and elsewhere) to not be sufficient in the light of increasing cost of living. Consequently, it is not uncommon that refugees chose to work uninsured in order not to lose eligibility for this cash assistance.<sup>110</sup> For refugees with registration issues and those who do not meet the ESSN criteria, there is no sustainable and systematic alternative mechanism of assistance. Both Syrians and non-Syrian refugees are seen to seek assistance elsewhere including local networks and associations, Social Assistance and Solidarity Foundations and NGOs, in addition to employing negative coping mechanisms such as getting in to debt to relatives or acquaintances, working in the informal economy, reducing food consumption as well as engaging children in work and marriage to meet basic needs.

## 2.5 EDUCATION AND PROTECTION

### 2.5.1 Education Framework

In Turkey, education is a human right protected by the Constitution (Article 42) in that ‘No individual can be deprived of the right to education.’ The right to education for refugees is stipulated under the LFIP, and admission procedures are regulated by the MoNE and the respective Provincial Directorates of National Education (PDoNE) in each province. With the efforts of GoT, MoNE and stakeholders (e.g. civil society, UNICEF, community-based organisations), the schooling rate achieved among refugee children at primary school level is 95.5%. However, the rate decreases to 57.66 % at secondary school level and 26.77% at high school level for a total of 643,058 refugee children in formal education.<sup>111</sup> The enrolment rate to early childhood education is as low as 33.8% for children under 6 years old.<sup>112</sup>

In order to incentivise school enrolment and attendance, the Conditional Cash Transfer for Education was introduced for Syrian and non-Syrian girls and boys. The rate of assistance progresses by age and is slightly higher for girls to increase their access to education. The CCTE reached 399,024 refugee children by May 2019, achieving a total of 511,453<sup>113</sup> child beneficiaries (256,389 boys and 255,064 girls) since its launch in

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<sup>107</sup>ESSN Task Force İstanbul Presentation, February 2019

<sup>108</sup>PRGA KII Service Provider, Ankara, (26/06/2019)

<sup>109</sup>Ibid.

<sup>110</sup>IGAM& Durable Solutions Platform, Syrians Working towards Self-reliance: Syrian Refugees’ Economic Participation in Turkey, March 2019, accessed via [http://dsp-syria.org/sites/default/files/2019-05/Working%20towards%20Self-Reliance\\_English.pdf](http://dsp-syria.org/sites/default/files/2019-05/Working%20towards%20Self-Reliance_English.pdf)

<sup>111</sup>MoNE Life Long Learning Directorate General Presentation, July 2019, accessed via [https://hbogm.meb.gov.tr/meb\\_iys\\_dosyalar/2019\\_06/26115239\\_14\\_HAZiran\\_2019\\_YNTERNET\\_SUNUUU\\_.pdf](https://hbogm.meb.gov.tr/meb_iys_dosyalar/2019_06/26115239_14_HAZiran_2019_YNTERNET_SUNUUU_.pdf)

<sup>112</sup>Ibid.

<sup>113</sup>Disaggregation as per nationality and/or registration status is not available.

May 2017.<sup>114</sup> On the other hand, similar to most services and assistance, CTE is made available to registered refugees in their province of registration and thereby does not extend to children who are residing in a different province other than their registration and unregistered children.

Syrian and non-Syrian refugee children can, in principle, enrol in Turkish public schools. However, policies at province and district levels differ according to registration status and available documentation. For registered refugees (under TP, IP or residence permits), an evidence of prior education, such as transcripts from the home country facilitate registration. The District Directorates of National Education conducts exams for those who have been away from education for several years in order to determine their level, and for those without transcripts. When absenteeism has been for more than 3 years, an Accelerated Learning Programme (ALP), launched in May 2018, is provided prior to enrolment at school. The ALP's reach is yet to grow and applies only to registered refugee children. By May 2019, the programme, has supported 10,453<sup>115</sup> children (4,876 girls and 5,577) boys and **one third of the graduates** were referred to Turkish public schools.<sup>116</sup>

The right to education for unregistered Syrian and non-Syrian children and children with registration issues is not guaranteed by the legislation. Their access is dependent on the discretion of school administrations and respective Provincial Directorates of National Education. The unregistered Syrian and non-Syrian children may be admitted to schools as 'guest students' (*misafir öğrenci*). On the other hand, guest student status is not known about by most refugee caregivers and children. Moreover, the scheme does not provide officially recognised transcripts or guarantee continuation the following year. The aforementioned conditions deter those caregivers who are aware of the scheme from pursuing it.<sup>117</sup> Public schools are reported to be stretched to capacity, and as a result, school administrations do not prioritise the admittance of unregistered refugee children in to schools. As a result, NGOs advocate on behalf of the children and coordinate with District Directorates of Education and the school administrations to facilitate children's enrolment as guest students.

## 2.5.2 School Attendance & Drop out

UNICEF provides regular updates on the school enrolment rates of registered refugee children in Turkey. As the table below indicates, approximately 400,000 registered Syrian and non-Syrian refugee children are not enrolled in the formal education system.<sup>118</sup> Whilst the exact number of unregistered refugee children deprived of formal education is not known, WFP reports at least 46% of unregistered children are not in school.<sup>119</sup>

The Comprehensive Vulnerability Monitoring Exercise (CVME) conducted amongst beneficiaries of ESSN, ineligible ESSN applicants as well as non- applicant households provides a grim comparison of school attendance among refugee children. According to the report, the proportion of children not attending school

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<sup>114</sup>UNICEF Humanitarian Situation Report #33, May 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report%20-%20May%202019.pdf>

<sup>115</sup> Disaggregation as per nationality and/or registration status is not available.

<sup>116</sup>UNICEF Humanitarian Situation Analysis Report #33, May 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report%20-%20May%202019.pdf>

<sup>117</sup>PRGA KII Service Provider, Keçiören, Ankara (13/05/2019)

<sup>118</sup>Ibid.

<sup>119</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

regularly<sup>120</sup> stands at 37%, with no significant difference between girls and boys.<sup>121</sup> However, the rate of absenteeism increases to 46% for unregistered refugees compared to 35% for registered.<sup>122</sup> The rate of absence is significantly high - 54% for children in households that are not applicants to ESSN (a part of whom are considered to be non-applicants due to their lack of registration). Girls in this group are much more absent from school than boys (60% and 47% respectively).<sup>123</sup>

**Table 2.5.2 Education Status of Refugee Children**

<b>Estimated Affected Population: 3,981,873</b>					
	<b>Registered Syrians</b>		<b>Registered non-Syrians</b>		<b>Total</b>
	<b>Male</b>	<b>Female</b>	<b>Male</b>	<b>Female</b>	
Total Affected Population	1,956,459	1,657,185	231,569	136,660	3,981,873
Children Affected (Under 18)	820,297	755,252	63,771	55,895	1,695,215
Children Under Five	269,013	251,136	15,718	14,903	550,770
Children Enrolled in Formal Education	326,573	316,485	56,701		643,058
Children Out-of-School (est.)	N/A		N/A		400,000

Source: UNICEF Humanitarian Situation Report, May 2019

Drop-out is a major issue among secondary and high school-aged refugee girls and boys. The dropout rate for Syrian girls rises with age. 60% of those aged 12 to 14 attend school, compared to only 23% of those aged 15 to 17.<sup>124</sup> During the course of this study, the most common reasons given for drop-out were lack of financial means to support education, (especially for families with multiple children), language barriers and challenges in adaptation encountered by children at school, limited support from parents and from teachers, as well as bullying by (mostly host community) peers. Furthermore, a number of Syrian parents identified mixed-gender classes in the years after primary school as a barrier to continuing in education, particularly for girls.

The data below published by the Ministry of National Education for the 2018-19 academic year indicates more than 50% of registered refugee children drop out in transition from primary to secondary school. The drop-out rate further increases in upper secondary (high school levels).<sup>125</sup>

<sup>120</sup>WFP defines school absence as in not attending school for the past semester (based on self-reported school attendance)

<sup>121</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

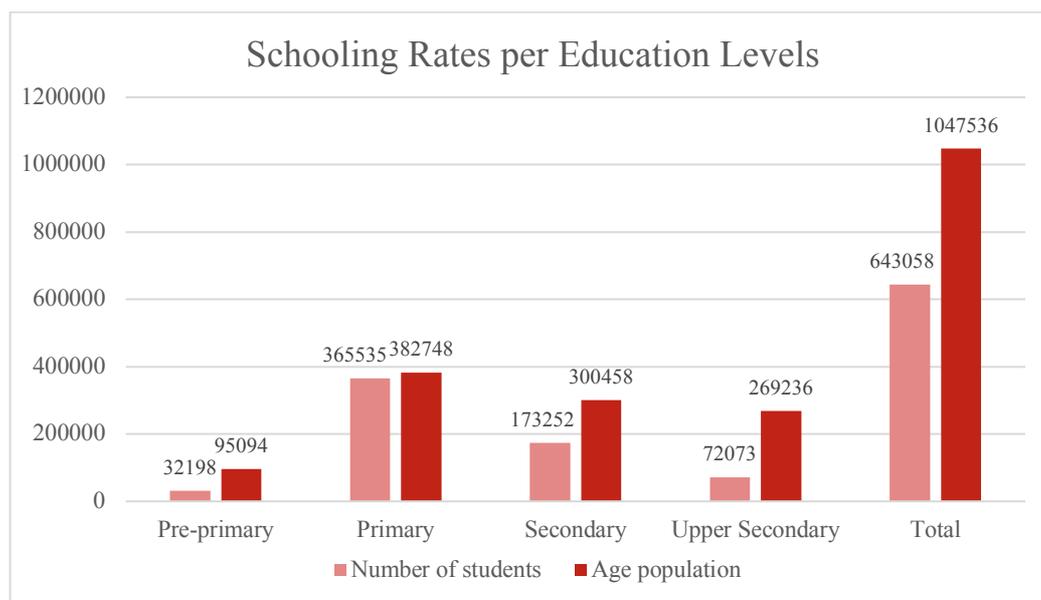
<sup>122</sup>Ibid.

<sup>123</sup>Ibid.

<sup>124</sup> UN Women & ASAM, Needs Assessment of Syrian Women and Girls under Temporary Protection Status in Turkey, 2018, accessed via [http://sgdd.org.tr/wp-content/uploads/2018/08/The\\_Needs\\_Assessment\\_ENG\\_WEB.pdf](http://sgdd.org.tr/wp-content/uploads/2018/08/The_Needs_Assessment_ENG_WEB.pdf)

<sup>125</sup>Ministry of National Education, Enrolment Rates to Formal Education (as of 14 June 2019), July 2019, accessed via [https://hbogm.meb.gov.tr/meb\\_iys\\_dosyalar/2019\\_06/26115239\\_14\\_HAZiran\\_2019\\_YNTERNET\\_SUNUUU\\_.pdf](https://hbogm.meb.gov.tr/meb_iys_dosyalar/2019_06/26115239_14_HAZiran_2019_YNTERNET_SUNUUU_.pdf)

**Figure 2.5.2 Schooling Rate for Registered Syrian and non-Syrian Children<sup>126</sup>**



Source: Ministry of National Education, June 2019

### 2.5.3 Vocational Education

In 2018, the Ministry of National Education issued a directive allowing refugee youths (age 14 to 18) under Temporary Protection to be admitted to Vocational Training Centres (VTCs) under Vocational Training Law 3308. This policy change enables young Syrians to be registered as ‘intern students’ (*çırak öğrenci*). Provided they work in an enterprise with a valid contract, they are insured against workplace accidents for four years of their education period. The prerequisites are TP registration in their province of residence and successful completion of an A1 level (basic) Turkish language course offered by the Public Education Centres. Fieldwork conducted for this study suggests the opportunity is rarely made use of by Syrians under TP.<sup>127</sup> According to an education expert, the dissemination of this education scheme is not at the desired level, with no central education authority in charge of informing and encouraging registration to the programmes in Vocational Training Centres.<sup>128</sup> Additional barriers, such as waiting periods for language courses, the dedication of time and resources to education (instead of working, per se) and the unpredictability of future prospects in their place of residence adversely affects the attendance of Syrian youth.

While the introduction of the scheme is promising with respect to skills-building and access to formal work for youth, the scheme at present only applies to registered Syrian youth. There is further need for effective communication of benefits as well as the conditions of admission to Syrians, in coordination with Vocational Training Centres, Provincial Directorates of National Education, Public Education Centres and civil society organisations and advocacy for expansion of the programme to non-Syrian youth.

### 2.5.4 Language and Vocational Courses Offered by the Public Education Centres

The Lifelong Learning Programme Regulation amended on 11 April 2018 stipulates under Article 43 that registered ‘foreigners’ (*meaning* Syrians under TP, non-Syrians under IP or IP applicants, individuals with

<sup>126</sup>Includes enrolment in public schools, Temporary Education Centres and open schools.

<sup>127</sup>PRGA KII Service Provider, Altındağ, Ankara (24/04/2019)

<sup>128</sup> Ibid.

residence permits), and those without any form of identification may, with approval by the respective Governorship, be admitted to vocational and language courses. The most sought-after course offered by Public Education Centres is Turkish, followed by literacy courses, in order to facilitate access to further education and work opportunities.

The discrepancy between benefits and assistance provided to incentivise attendance on these courses creates confusion and competition among the refugee community. The regular courses in Public Education Centres do not provide incentives to refugees. However, some language and skills-building courses funded by international donors and provided in the Public Education Centres offer per diems ranging from 100 to 400 TRY/course, transportation or material support.<sup>129</sup> This creates a preference towards incentivised courses by the refugees. Additionally, the courses primarily target Syrians with TP registration. While the admission of unregistered refugees and individuals with residence permits does occur, the reach to these groups is limited and their admission is at the discretion of Public Education Centre administrations. During the course of this assessment, the insufficient number of courses opened, long waiting lists and challenges faced by administrative staff as a result, were noted as barriers by refugee communities and non-governmental front-line workers. Despite the regulation, unregistered refugees, and foreigners with residence permits remain largely excluded from attending Public Education Centre courses.

## 2.6 HEALTH AND PROTECTION

Whilst health services are provided to refugees in Turkey, the levels of care and pathways to access health facilities differ according to registration status and type. For the Syrians under Temporary Protection status, rights and service pathways are defined by the Ministry of Health Circular No 9468 on Health Benefits for Temporary Protection Beneficiaries (2015), and for refugees under IP by the Social Insurance and General Health Insurance Law (No 5510). In principle the health services are free of charge, however there are certain treatment costs and medication that are not covered by the health insurance issued to refugees under TP and IP. Such costs are regulated by the Healthcare Implementation Directive and the eligible treatment and associated costs (if any) are updated annually.<sup>130</sup>

Refugees under TP and IP are eligible to make use of health services only in their province of registration. This renders refugees who are mobile in Turkey, such as seasonal workers and those with registration in a different province, at risk. Unregistered refugees only have access to preventive and emergency healthcare services, which is, in practice, impeded by their (lack of) registration status. According to the SCI Baseline Assessment conducted in İstanbul, unregistered refugees may refrain from approaching public health facilities through a fear of detention.<sup>131</sup>

In addition to public health facilities, Migrant Health Centres (MHCs) provide primary health care and a few Extended MHCs (*Güçlendirilmiş Göçmen Sağlık Merkezi*) provide partial secondary health care including gynaecological, paediatrics or internal medicine along with dental health services.<sup>132</sup> The Migrant Health

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<sup>129</sup>PRGA KII Service Provider, İstanbul (30/05/2019)

<sup>130</sup>A contribution fee may apply to prescribed drugs, or on treatments (in line with Health Implementation Directive, 2019).

<sup>131</sup>Save the Children, Baseline Report: Strengthening the Protection and Resilience among Refugee and Host Community Children and Adults in Zeytinburnu, İstanbul, February 2019.

<sup>132</sup>WHO, Health Emergency Response to the Crisis in the Syrian Arab Republic, Annual Report, 2019, accessed via <http://www.euro.who.int/en/countries/turkey/publications/health-emergency-response-to-the-crisis-in-the-syrian-arab-republic-annual-report-2018-2019>

Centres<sup>133</sup> may in principle provide healthcare services for all refugees. For non-Syrian unregistered refugees, the lack of interpreters at the MHCs to facilitate communication and a lack of a form of civil documentation or valid form of ID such as a passport to enable admission, however constitute major barriers against the use of MHC services. Whilst the capacity and services provided in MHCs are extending in time, getting medical treatment further than primary level remains a challenge for all unregistered refugees at present, unless they pay for treatment and medication.

**Table 2.6 Types of Health Services Available to Refugees in Turkey**

Level of Care	Institutions	Services	SuTP	IP applicant and IP	Unregistered
Primary Health Care <sup>134</sup>	Health stations, family health centres, maternal and infant care and family planning centres, and tuberculosis dispensaries	Initial diagnosis, treatment, and rehabilitation services	Yes	Yes	No
Secondary Health Care	State Hospitals	Specialised diagnosis and treatment	Yes	Yes	No
Tertiary Health Care	University research hospitals research education hospitals	Specialised diagnosis and treatment	Yes	Only with referral	No

Sexual and reproductive health (SRH) services to refugee women and girls are provided via 35 Women and Girls Safe Spaces (WGSSs) as well as 4 Youth Centres in 17 cities where refugees are the most populous. Most of the WGSSs are in process of being embedded in Migrant Health Centres to ensure integrated services. 31 structured sessions on health and gender awareness are implemented by UNFPA partners in WGSS in the aforementioned centres across the country, however access for boys and men remains limited.<sup>135</sup> A study on Syrian refugee women's health in Lebanon, Turkey and Jordan indicates that SGBV, access to family planning, infant morbidity, and preterm birth were common women's health issues. However, pregnancy complications were especially prominent in Turkey, while the underlying causes of the disparity were not reported.<sup>136</sup> The legal obligation to report pregnancies for girls under 16 years old in Turkey drives adolescent pregnancies that occur as a result of child marriage underground.<sup>137</sup> Anecdotes detailing the increase in adolescent pregnancies were spoken about during this study, describing situations whereby, due to the fear that they will be reported, girls have been forced to hide their pregnancies and only seek medical attention in unregistered health facilities, and in public hospitals only as a last resort for the majority of cases.<sup>138</sup>

<sup>133</sup>MHCs function under the Ministry of Health (MoH), are supported by World Health Organisation (WHO) and the UNFPA.

<sup>134</sup>Primary health care services include screening and immunization for communicable diseases, specialized services for infants, children and teenagers, as well as maternal and reproductive health services.

<sup>135</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>136</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>137</sup>UNFPA, 'In Turkey Refugee Child Marriages Drive Adolescent Pregnancies Underground', 2018, accessed via <https://www.unfpa.org/news/turkey-refugee-child-marriages-drive-adolescent-pregnancies-underground>

<sup>138</sup>PRGA KII Service Provider, Ankara (21/06/2019)

## 3. THE PROTECTION CONTEXT AND SERVICES IN THE TARGETED DISTRICTS

The following section outlines the protection context and services in Keçiören and Altındağ (Ankara), and Avcılar and Ümraniye (İstanbul) where Save the Children International (SCI) is conducting protection programmes. The sub-sections primarily address questions 6-9 and 10-11 of the ToR for this study and examine:

- The district-level policies and their impact on the protection situations of the most marginalised groups.
- The programmes and services in place to prevent and respond to the protection concerns of the most marginalised groups at community and district level.
- The gaps and barriers at service-provision level that hinder the most marginalised population groups from achieving adequate protection.
- Emerging trends in the protection context and service provision.
- Good practices at district and province-levels.

### 3.1 POPULATION OVERVIEW IN THE TARGETED DISTRICTS

#### Keçiören and Altındağ, Ankara

94,836 Syrians under Temporary Protection<sup>139</sup> and 30,965 individuals under International Protection<sup>140</sup> are registered in Ankara. The figures do not include Syrians living in Ankara with registrations in other provinces, unregistered refugees (mainly from Afghanistan) and those with short-term and humanitarian residence permits (mostly Iraqi Arabs and Turkmans). There are no publicly available figures on the population of refugees per district or per age and gender. The estimations point to approximately 70,000 refugees in Altındağ (mostly Syrian) and more than 30,000 in Keçiören (mostly Iraqis followed by Syrians, Afghans and Somalians).<sup>141</sup>

Syrians predominantly reside in the Altındağ district (Önder, İsmetpaşa, Ulubey, Solfasol and Doğu neighbourhoods) while Iraqis with residence permits and some Iraqis under IP reside in Keçiören and Mamak. Refugees from Afghanistan under IP and unregistered Afghans are dispersed throughout Ankara but are also residing in the Yeşilöz neighbourhood (Keçiören) and Dışkapı (Altındağ).

#### İstanbul

According to the official figures, İstanbul is home to 552,080 registered Syrians under Temporary Protection<sup>142</sup> and a relatively small number of refugees under International Protection. On the other hand, an IOM Baseline Assessment conducted in İstanbul puts the overall number of ‘migrants’<sup>143</sup> at 1,410,635, out of which 897,718

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<sup>139</sup>DGMM, Temporary Protection Statistics, November 2019, accessed via [https://www.goc.gov.tr/icerik3/gecici-koruma\\_363\\_378\\_4713](https://www.goc.gov.tr/icerik3/gecici-koruma_363_378_4713)

<sup>140</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>141</sup> The figures are based on Göç-Der’s estimations.

<sup>142</sup>DGMM, Temporary Protection Statistics, November 2019, accessed via [https://www.goc.gov.tr/icerik3/gecici-koruma\\_363\\_378\\_4713](https://www.goc.gov.tr/icerik3/gecici-koruma_363_378_4713)

<sup>143</sup> ‘Migrants’ term above is used as per the report’s terminology.

are Syrians and 89,713 are Afghans followed by Turkmen, Uzbeks and Iraqis (in descending order).<sup>144</sup>

### Avcılar, İstanbul

The same IOM study identifies approximately 37,000 ‘migrants’ in Avcılar, out of which 26,000 are Syrians, followed by Iraqis as the second largest group.<sup>145</sup> Most Syrians reside in the Tahtakale and Yeşilkent neighbourhoods at the northern edge of the district close to Esenyurt, where rents are cheaper, and the informal economy absorbs refugee workers (including children) into the textile, construction and manufacturing sectors. The district centre of Avcılar, particularly the neighbourhood of Denizköşkler, hosts a sizable Syrian population.

### Ümraniye, İstanbul

The SCI Baseline Assessment<sup>146</sup> conducted in 2018 detected an estimated number of 15,000 Syrian refugees in Ümraniye, whereas the IOM Baseline Study found that approximately 18,965 Syrians and 2,113 Afghans contribute to the ‘migrant’ population of 24,000 in the district.<sup>147</sup> Syrians are dispersed throughout the Topağacı, Elmalıkent, Dumlupınar, İnkılap, Yamanevler, and Dudullu neighbourhoods, whereas Afghans are seen to reside more in the neighbourhoods of Dudullu and Site. Syrian refugees opt to reside in Ümraniye given the cheaper rents particularly in the northern and eastern parts. Employment opportunities, mostly in the informal sector, in small enterprises such as textiles, manufacturing and small shops, are amongst the reasons why refugees choose this district. In addition, the presence of community-support networks contributes to their settling here.

## 3.2 PROTECTION SERVICES IN THE TARGETED DISTRICTS

### State Services at District-Levels

The Provincial Directorates of Ministry of Family, Labour and Social Services are responsible for the provision and coordination of protection services for refugees in Ankara and İstanbul. At the district-level, PDoFLSSs undertake the identification of protection needs via Social Service Centres (including the outreach ASDEP programme). The Directorates coordinate relevant response measures with their respective Directorate General units and other district agencies. The services are mainly targeted towards registered refugee women, children, persons with disability and the elderly.

In line with Municipality Law (No 5393, Article 13) all registered residents in a district may, in principle, make use of assistance provided by the municipalities. It must be noted however, that no formal mandate and dedicated budget is assigned to the municipalities on the provision of assistance to refugees per se. Thus, the level of provided support and refugees’ access to services varies according to the respective municipalities’ available annual resources and to their discretion.

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<sup>144</sup> IOM, Turkey DTM Baseline Assessment Report İstanbul, May 2019, accessed via <https://migration.iom.int/reports/turkey-dtm-baseline-assessment-report-İstanbul-province-round-1-october-december-2018>

<sup>145</sup> Ibid.

<sup>146</sup> Save the Children International, Baseline Assessment: Strengthened Protection and Wellbeing Among Refugee, Youth and Adults in İstanbul and Ankara, 2018.

<sup>147</sup> IOM, Turkey DTM Baseline Assessment Report İstanbul, May 2019, accessed via <https://migration.iom.int/reports/turkey-dtm-baseline-assessment-report-İstanbul-province-round-1-october-december-2018>

Some of the services and assistance provided by the municipalities to registered Syrian and non-Syrian refugees include food and in-kind assistance i.e. coal, medical appliances, appliances for people with disabilities, clothing, diapers for infants and ill people. The support provided is dependent on the applicant demonstrating their residence in the particular district (*ikamet belgesi by Nüfus*) and the presentation of their poverty declaration documents (acquired from mukhtars). A number of municipalities further engage Syrian and non-Syrian refugees in skills-building and language courses (literacy and Turkish language courses, vocational courses) such as the Keçiören and Altındağ Municipalities in Ankara and provide cash or in-kind assistance such as Avcılar and Ümraniye Municipalities.

The following services and institutions are, in principle, accessible to registered refugees in their province of registration: public schools, language and vocational training in Public Education Centres, health care in public facilities, assistance from employment agencies (İŞKUR) and Guidance and Research Centres (*Rehberlik Araştırma Merkezi, RAM*) for counselling and special education. Consequently, the access of unregistered Syrian and non-Syrian refugees and those with registration issues (i.e. pending applications for TP, ID issued in a different province than of residence) cannot make use of these services by right. Their access is at the discretion of the aforementioned institutions and mostly unattainable.

### Services Provided by Non-State Actors at District-Levels<sup>148</sup>

In the light of the overarching policy that provides services to registered refugees, non-governmental organisations are assuming a significant role in coordination and referrals with respective state institutions at district-levels. NGOs also provide complementary services for refugees who are not eligible to access public services (for registered and unregistered refugees) or need specialised assistance and to those who may refrain from seeking support from state agencies.

As of 2018 national and international non-governmental organisations' psychosocial support programmes are subject to authorisation by PDoFLSSs, in line with amendment 11208 to the TPR. This includes authorisation to conduct outreach activities. Reportedly, the granting of authorisations takes varying time and this impacts on the service delivery capacities of NGOs. For example, non-governmental organisations in Ankara, in a lack of authorisation to conduct outreach and household visits, have limited means to identify the most marginalised refugees in need and thus provide adequate service provision.

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<sup>148</sup>The term non-state actor is used to encompass the variety of organisations including NGOs, association and foundations.

### 3.2.1 PROTECTION SERVICES IN KEÇİÖREN AND ALTINDAĞ

**Table 3.2.1 Protection Actors in Keçiören and Altındağ<sup>149</sup>**

Actors in the Keçiören District			
Service Provider	Public /Non-State Actor	Service Sector	Services & Activities <sup>150</sup>
Association of Migrant Rights and Social Cohesion (Göç-Der)	Non-State	Protection, MHPSS	Case management, referrals, Individual Protection Assistance (IPA), structured psychosocial activities with children and youth, information dissemination, community-led protection committees for adults, youths and children. Services are available in Arabic and Farsi.
Keçiören Migrant Service Centre (KMSC)	Non-State	Protection, Education	Language and vocational training, counselling in livelihoods (LLH), education, psychological support, health, social services, information sessions, legal assistance. Services are available in Arabic and Farsi.
Centre of Asylum and Migration Studies (IGAM) Refugee Information Centre	Non-State	Protection (Child Protection/ GBV/MHPSS/ legal assistance)	Information sessions, case management, referrals (on education, livelihoods, health services), legal assistance, accompaniment to state service providers.
Association for Solidarity with Asylum Seekers and Migrants (ASAM) Women Health Centre	Non-State	Protection (SGBV, MHPSS, Legal Assistance) Health	Sexual and reproductive health counselling, case management, referrals, information sessions on child protection, SGBV, legal assistance.
Association of Assistance, Solidarity and Support for Refugees and Asylum Seekers (MSYD ASRA)	Non-State	Protection MHPSS	Special Needs Fund (SNF) assistance, case management, MHPSS, provision of medical equipment and medication, interpretation provision.
Keçiören Municipality	Public	Social Services & Assistance	In-kind assistance, language, literacy and skills building courses.
Keçiören Social Service Centre (SSC)	Public	Protection, Social Assistance	Protection services, counselling, awareness-raising sessions, referrals to state institutions on identified

<sup>149</sup> Based on SCI and Göç-Der Service Map 2019.

<sup>150</sup> Some of the services are available to registered refugees or provided to a limited extent to unregistered refugees.

protection needs, social assistance (i.e. Social-Economic Support (SED), disability home care assistance).

Keçiören Assistance and Solidarity Foundation (SASF)	Social and Foundation	Public	Social Assistance	Social assistance (in-kind and financial assistance including ESN, CCTE application point).
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### Actors in the Altındağ District

Service Provider	Public /Non-State Actor	Service Sector	Services & Activities	
(i)Migrant Centre (ii)Extended Health Centre	Health Migrant	Public & Non-State	Protection, Health	Primary and secondary level health care services, disability home care services, psychological counselling, health and SRH awareness raising sessions, covering costs of prescribed medication, case management and referrals.
Turkish Red Crescent Ankara Community Centre	Non-State	Protection, Livelihoods, Education, Social Cohesion	Protection activities, PSS support, legal assistance, livelihood activities, vocational courses, language courses, Foreigner Student Exam (YÖS) preparatory courses, case management, referrals, Special Needs Fund (SNF), social cohesion activities.	
ASAM Al Farah Child and Family Support Centre	Non-State	Protection, MHPSS	Case management, referrals, legal assistance, structured skills-building and psychosocial support programmes for children, youth and young adults, emergency cash assistance, structured programme for prevention of child marriage.	
Union of Medical Care and Relief Organizations Mental Health Centre	Non-State	Protection, MHPSS	Individual and group counselling, psychoeducation, speech therapy, covering costs of prescribed medication.	
Göç-Der Centre for People with Disabilities	Non-State	Protection, MHPSS	Case management, referrals, Individual Protection Assistance (IPA), structured psychosocial activities with children and youth, information dissemination, community-led protection committees for adults, youth and children. Services are available in Arabic and Farsi.	

Altındağ Social Service Centre (SSC)	Public	Protection, Social Assistance	Protection services, counselling, awareness raising sessions, referrals to state institutions on identified protection needs, social assistance (i.e. Social-Economic Support (SED), disability home care assistance).	
Altındağ Assistance and Solidarity Foundation (SASF)	Social and Foundation	Public	Social Assistance	Social assistance (in-kind and financial assistance including ESSN, CCTE application point).

Specialised protection activities including of structured psychosocial activities targeting children and adolescents appear to be limited in Keçiören, where provided by only Göç-Der, those are provided by a number of actors in the Altındağ district.

Coordination and interagency referrals are ongoing, primarily between actors in the Keçiören, Altındağ and Mamak districts where refugees are the most populous. Specialised support is provided by KAOS GL, which offers consultations to LGBTI refugees online and via phone, and also by Red Umbrella through their experience in working with sex-workers and LGBTI refugees.

In addition to the aforementioned actors above, a number of local organisations/networks were brought up in the study, namely the İnfak Foundation, Ottoman Turkman Foundation, Iraqi Turkman Foundation and Friends of Afghans Association. These associations are dispersed throughout Ankara and provide in-kind and basic-needs assistance for refugees. According to a participant, local associations and networks are consulted primarily due to their flexible eligibility criteria, which enables them to offer assistance to unregistered refugees and those with residence permits.<sup>151</sup> However, consultations with service providers and refugees point to a perceived lack of or unclear criteria on how to get assistance, the sporadic nature of the support provided, and also favouritism towards certain ethnic groups and fellow country men and women.<sup>152</sup>

### 3.2.2 PROTECTION SERVICES IN AVCILAR

**Table 3.2.2 Protection Actors in Avçılar<sup>153</sup>**

Actors in the Avçılar District			
Service Provider	Public /Non-State Actor	Service Sector	Services & Activities <sup>154</sup>
Save the Children International (SCI)	Non-State	Protection, MHPSS	Case management, referrals, Individual Protection Assistance (IPA), structured psychosocial activities with children, youth and caregivers, information dissemination, community-led

<sup>151</sup> PRGA KII Service Provider, Keçiören, Ankara (22/04/2019)

<sup>152</sup> PRGA KII Iraqi Male Community Leader, Ankara (24/04/2019) KII Afghan Female Community Leader, Ankara (10/05/2019), FGD Service Provider, Ankara (27/06/2019)

<sup>153</sup> Based on SCI Service Map 2019.

<sup>154</sup> Some of the services are available to registered refugees or provided to a limited extent to unregistered refugees.

				protection committees for adults, youth and children.
Avcılar Health Centre	Migrant	Non-State & Public	Protection, Health	Primary health care services, psychological counselling, health and SRH awareness-raising sessions, case management and referrals, covering costs of prescribed medication.
ASAM embedded in Avcılar Municipality (central Avcılar)		Non- State	Social Assistance, Protection	Case management, social assistance.
Milad Association		Non-State	Education, Basic Needs	Education activities for Syrian children including Qur'an courses, Arabic literacy courses, social activities, financial and in-kind support.
World Academy for Local Government and Democracy (WALD)		Non-State	Protection, MHPSS, legal assistance	Legal assistance, psychological counselling, referrals.
Avcılar Social Service Centre (SSC)	Social	Public	Protection & Social Assistance	Protection services, counselling, awareness raising sessions, referrals to state institutions on identified protection needs, social assistance (i.e. Social-Economic Support (SED), disability home care assistance).
Avcılar Assistance and Solidarity Foundation (SASF)	Social	Public	Social Assistance	Social assistance (in-kind and financial assistance including ESSN, CCTE application point).

### Actors within proximity of Avcılar

Service Provider		Public / Non-State Actor	Service Sector	Services & Activities
UOSSM Health Centre (Esenyurt)	Mental Centre	Non-State	Protection	Individual and group counselling, psychoeducation, speech therapy, covering costs of prescribed medication.
Association for Aid and Relief Japan (AAR) (Esenyurt)		Non-State	Protection, Health	Psychosocial support, case management, supply of assistive devices for people with disabilities, refugee committees.
Turkish Red Crescent Bağcılar Community Centre (Bağcılar)		Non-State	Protection, Livelihoods, Education, Social Cohesion	Protection activities, psychosocial support, legal assistance, livelihood activities, vocational courses, language courses, Foreigner Student Exam (YÖS) preparatory courses, case management, referrals, Special Needs Fund (SNF), social cohesion activities.

ASAM Service (Fatih)	Migrant Centre	Non-State	Protection	Structured psychosocial support activities, case management, legal assistance, skills-building activities, vocational trainings.
Şefkat-Der (Esenyurt)		Non-State	Protection, SGBV	Shelter for survivors of violence, women.

The SCI Baseline Assessment conducted in 2018 in Avcılar is indicative of a Syrian community with differing levels of access to assistance. Accordingly, 48% of Syrian respondents reported access to regular assistance, while 36 % stated they received no assistance from service providers (the lowest rate of assistance noted among all the districts targeted by the SCI project).<sup>155</sup> Consultations for this study indicate that Syrian refugees residing in the Yeşilkent neighbourhood of Avcılar have limited access to state services due to a lack of registration and the peripheral location of this neighbourhood. Also reported was a limited number of service providers in the area and a lack of financial means to travel to services elsewhere in the district.

In the neighbourhood of Yeşilkent, no safe spaces dedicated to holding structured protection activities and meetings (e.g. a community centre or any suitable space) have been allocated by local authorities. This means that the NGOs have to make use of small, unsuitable spaces for sessions or use the classrooms of the nearby primary school when/if authorised. Given the limited number of protection actors in Avcılar, there is a gap of protection activities (i.e. structured psychosocial support) targeting children and youth which puts this group at risk of exclusion from such services and lack of/late identification of protection risks around children and youth.

The peripheral location of the neighbourhood requires Syrians to commute in order to access services. Syrians dealing with high poverty, and/or language barriers are therefore discouraged from pursuing the existing service pathways and they often seek support from NGOs in order to access state services.<sup>156</sup> While thorough case management and referral services are provided, support on issues with registration, assistance with basic needs, financial aid and access to health care are identified as priority needs by the refugees themselves. A lack of assistance in mental health and special needs funds, at least in the vicinity of Yeşilkent Avcılar, requires referrals to organisations within the catchment area of Avcılar such as AAR Japan and UOSSM from the neighbouring Esenyurt district.

The services provided by the Avcılar Municipality are mainly made available via the Avcılar centre, whereas a social worker working out of the Avcılar Municipality Service Centre located in the Yeşilkent neighbourhood complements those activities provided by SCI and WALD. This mostly takes the form of in-kind assistance to vulnerable Syrian households. However, the assistance is sporadic and is subject to documentation of registration ID.<sup>157</sup>

<sup>155</sup>SCI Baseline Assessment, Strengthened Protection and Wellbeing Among Refugee, Youth and Adults in İstanbul and Ankara, 2018.

<sup>156</sup>PRGA FGD Service Provider, Avcılar, İstanbul (06/05/2019)

<sup>157</sup>PRGA KII Service Provider, Avcılar, İstanbul (03/05/2019)

A Syrian community leader identified the use of the Barış Manço Culture Centre and the Avcılar Youth Centre for Syrian refugees in central Avcılar. However, their access to these is reportedly irregular due to changing practices such as the requirement of TP registration in order to access the centres and contribution fees.<sup>158</sup>

### 3.2.3 PROTECTION SERVICES IN ÜMRANIYE

**Table 3.2.3 Protection Actors in Ümraniye<sup>159</sup>**

Actors in the Ümraniye District				
Service Provider		Public / Non-State Actor	Service Sector	Services & Activities <sup>160</sup>
Save the Children International	Children	Non-State	Protection, Education	Case management, referrals, Individual Protection Assistance (IPA), structured psychosocial activities with children, youth and caregivers, information dissemination, community-led protection committees for adults, youth and children.
Ümraniye Health Centre	Migrant	Public & Non-State	Protection, Health	Primary health care services, psychological counselling, health and SRH awareness-raising sessions, case management and referrals, covering costs of prescribed medication.
ASAM Women and Girls Safe Space		Non-State	Health, Protection, SGBV	Reproductive health counselling, case management, referrals, information sessions on child protection, SGBV, legal assistance.
Yuva Association		Non-State	Education	Turkish language courses, catch up/remedial courses for children and youth, Foreigner Student Exam (YÖS) preparation course.
Ümraniye Municipality		Public	Social Assistance Basic Needs	Provision of in-kind assistance, bi-monthly cash assistance to registered Syrians for basic needs.
Ümraniye Social Service Centre (SSC)	Social	Public	Protection & Social Assistance	Protection services, counselling, awareness-raising sessions, referrals to state institutions on identified protection needs, social assistance (i.e. Social-Economic Support (SED), disability home care assistance).

<sup>158</sup>PRGA KII Syrian Female Community Leader, Avcılar (06/05/2019)

<sup>159</sup> Based on SCI Service Map 2019.

<sup>160</sup> Some of the services are available to registered refugees or provided to a limited extent to unregistered refugees.

Ümraniye Assistance and Solidarity Foundation (SASF)	Social and Foundation	Public	Social Assistance	Social assistance (in-kind and financial assistance including ESN, CCTE application point).
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### Actors within proximity of Ümraniye

Service Provider	Public / Non-State Actor	Service Sector	Services & Activities
Aziz Mahmud Hudayi Foundation (Üsküdar)	Non-State	Basic Needs Social Assistance Education	NFI and food distribution to Syrians, financial assistance, youth education and life skills activities, religious education.
Extended Health Centre (Sultanbeyli)	Public & Non-State	Protection	Primary and secondary level health care services, disability home care, psychological counselling, health and SRH awareness-raising sessions, covering costs of prescribed medication, case management and referrals.
Refugees Association (Sultanbeyli) <i>via three established centres:</i> Sultanbeyli Community Centre, Children and Youth Centre, Women Shelter	Non-State	Protection (MHPSS, SGBV, Social Cohesion, Community Engagement) Livelihoods, Health	Interpretation support, accompaniment to health facilities, health SNF, rehabilitation services, psychological support, language courses, Foreigner Student Exam (YÖS) preparatory courses, refugee council, legal assistance, business and career counselling, vocational courses, child and youth centre, women's shelter.
Turkish Red Crescent Sultanbeyli Community Centre	Non-State	Protection, Livelihoods, Education	Protection activities, PSS support, legal assistance, livelihood activities, vocational courses, language courses, Foreigner Student Exam (YÖS) preparatory courses, case management, referrals, Special Needs Fund (SNF), social cohesion activities.

The number of non-governmental organisations in Ümraniye is limited compared to other districts in İstanbul. However, a number of organisations (detailed above) that provide multi-sectoral and comprehensive services, such as the Turkish Red Crescent, Refugees Association, and an Extended Migrant Health Centre are located in the Sultanbeyli district. In order to make use of these services, regular referrals and follow up by agencies based in Ümraniye are necessary. According to a frontline worker, the fact that the services required are available in other districts creates difficulties and accessing them is not feasible at all times especially for those refugees who cannot afford to cover transportation costs, or those with mobility issues, women etc.<sup>161</sup> A lack of specialised protection services targeting children and youth in Ümraniye is a major gap which may be a

<sup>161</sup> PRGA KII Service Provider, İstanbul (02/07/2019)

factor (among others) in the choice of Syrian refugees in opting for Qur'an courses, summer schools by religious teaching centres to respond to the development of children and youth. (for more see Section 3.2.3.1 Local Support Networks and Foundations in Ümraniye).

Consultations with service providers indicate that the main pressing issues in Ümraniye are linked to registration, access to health and to education.<sup>162</sup> Assistance with basic needs, financial assistance and NFI were the needs raised most often by Syrian women.<sup>163</sup> The Ümraniye Municipality reportedly provides cash assistance every two months to the registered refugee households in need. Despite this, serious deficiencies in their basic needs drive refugees to seek support from local support mechanisms and foundations which are examined further in the following sub-section.

### 3.2.3.1 Local Support Networks and Foundations in Ümraniye

In Ümraniye, unlike the other districts targeted by SCI, there are a number of local associations/foundations and networks which offer assistance and services to Syrian refugees. It appears that these local support mechanisms were in place before the arrival of Syrian refugees and were already catering to the needs of the host community.

Some of the major local assistance modalities provided at local level are in-kind and cash assistance, and the provision of charity-based food and non-food-item distributions. Also, a number of religious teaching centres are embedded in local mosques are available to both host community and refugee boys and girls, i.e. Sabir Mosque, Meyvelibahçe Mosque, İlim Sarayı Mosque.<sup>164</sup> According to an NGO worker, the aforementioned assistance appeals to the social and material needs of Syrian refugees, and this in turn impedes Syrians in Ümraniye them from seeking support and information from non-governmental organisations located in the district.<sup>165</sup>

Similarly, a Syrian community leader has expressed dissatisfaction with state and non-governmental organisations in the community, to the effect that the services and policies in place do not reflect the needs of the Syrians there. His view is that the policies and services are changing continuously, and do not provide support in such areas as registration, access to jobs, and language courses, assistance with basic needs. These shortfalls in service provision cause the Syrians to seek information and support from local networks, or not to avail of services offered by NGOs at all<sup>166</sup>.

A local foundation based in Üsküdar provides monthly in-kind and cash assistance to Syrians in İstanbul, including those in Ümraniye. The assistance is distributed to Syrians in need via Syrian imams and the foundation's volunteers.<sup>167</sup> However, according to Syrian respondents, the eligibility criteria is not clear, and accessing the assistance appears to be aligned with networking with gatekeepers such as Syrian imams and local shop owners.<sup>168</sup> Syrian women brought up some other irregular distributions taking place in the district,

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<sup>162</sup> PRGA FGD Service Provider, Ümraniye, İstanbul (05/07/2019)

<sup>163</sup> PRGA FGD Syrian women, Ümraniye (03/07/2019)

<sup>164</sup> PRGA KII Syrian Female Community Leader, Ümraniye (03/07/2019), KII Service Provider, İstanbul (04/07/2019), FGD Syrian young girls (13-17 years old), Ümraniye (03/07/2019)

<sup>165</sup> PRGA FGD Service Provider, Ümraniye, İstanbul (05/07/2019)

<sup>166</sup> PRGA KII Syrian Male Community Leader, Ümraniye (29/06/2019)

<sup>167</sup> PRGA KII Service Provider, İstanbul (04/07/2019)

<sup>168</sup> PRGA KII Syrian Male Community Leader 2, Ümraniye (04/07/2019), Syrian Male Community Leader 3, Ümraniye (05/07/2019)

mainly in mosques in the neighbourhood of Topağacı, on which the women are informed by neighbours, as well as by small shop owners.<sup>169</sup>

Any community-based assistance available in the local community is sporadic in nature and to a large extent facilitated through male gatekeepers (i.e. imams, community leaders, shop owners). This may pose a barrier for women to access them, and also raises concerns with respect to their protection. Similar risks may also apply to refugees who do not, for whatever reason, choose to engage with the aforementioned gatekeepers.

### 3.3 GAPS AND BARRIERS IN SERVICES AT DISTRICT-LEVELS

The following section underlines the gaps, barriers and challenges identified at service provision level which hinder the protection of refugees and their adequate access to services. The majority of the gaps and barriers noted were shared and echoed across the districts and as such, the findings are clustered under common themes/headlines.

#### Gaps in Information Dissemination on Registration and Rights

69% of females and 65% of male refugees do not feel informed about their rights, responsibilities and assistance available to them in Turkey.<sup>170</sup> Individuals of Afghan origin particularly feel uninformed (77%).<sup>171</sup> Despite efforts regarding the dissemination of information at national and local levels, refugees who may be eligible for TP and IP still face challenges in accessing accurate information with respect to registration processes. Institutional policy changes on the TP registration of Syrians (a period of suspension of registration followed by the complete cessation of new TPID registration of Syrians in July 2019), coupled with the sporadic issuance of humanitarian residence to refugees who may be eligible for IP if relocated to satellite cities creates confusion and a lack of clarity with respect to the registration processes. Moreover, reportedly these policy measures have not been clearly communicated, neither to the refugee communities nor to NGOs. Whilst PDMs have the obligation to inform refugees verbally and in writing on their rights and entitlements as well as their responsibilities during the registration process, consultations indicate that there is limited information sharing taking place. Some challenges noted in this regard are:<sup>172</sup>

- Lack of publicly available criteria on the definition of ‘highly vulnerable Syrians’ who may be registered under TP in İstanbul (in the period which preceded the İstanbul governorship’s announcement of July 22<sup>nd</sup>, 2019);
- Lack of response to information requests on criteria for registration by PDMs to non-governmental organisations (in the period which preceded the İstanbul governorship’s announcement of July 22<sup>nd</sup>, 2019);
- Lack of guidance to refugees in Ankara and İstanbul on determining ‘open’ provinces including satellite cities for registration for both TP and IP.

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<sup>169</sup>PRGA FGD Syrian women, Ümraniye (03/07/2019)

<sup>170</sup>UNHCR, Protection Sector Gender Thematic Dashboard, February 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/69560.pdf>

<sup>171</sup>UNHCR, Communication with Communities Survey Results, July 2019, accessed via <https://reliefweb.int/sites/reliefweb.int/files/resources/70609.pdf>

<sup>172</sup>PRGA KII Service Provider, Ankara (16/04/2019), PRGA KII Service Provider, İstanbul (24/05/2019), FGD Service Provider, Ümraniye (05/07/2019)

In addition to the challenges above, it should be noted that some unregistered refugees in non-satellite cities such as Ankara and İstanbul may refrain from seeking information from PDMs, and as a result may not have access to essential information on the benefits or risks associated with lack of registration.

### Responding to the Needs of Refugees with Different Registration Statuses

As the primary criteria to access services provided by state actors is defined by registration status, an increasing number of refugees who have registration issues as well as unregistered refugees in all districts are in practice excluded from the provision of state services. While a number of non-governmental organisations support unregistered refugees, refugees with residence permits and those with registration pending, the referral options are limited, and the results are mostly unsatisfactory due to a lack of alternative support mechanisms and tools. The limited access to public service provision pushes individuals who are able to consult with numerous organisations to make sure some sort of assistance is achieved. However, those who cannot access NGOs and foundations (i.e. refugees with mobility issues, who have limited Turkish language skills or those who lack information and community support) are under risk of further exclusion from the services available through non-state actors.

In Ankara, the affected population includes unregistered refugees that are primarily from Afghanistan, Syrians who have registrations in other provinces and refugees with residence permits, mainly Iraqis and Somalians residing in Keçiören.

In Avcılar, particularly in the Yeşilkent neighbourhood, the cessation in the registration of Syrians affects a significant number of those refugees who have pending registration or are living there with registration in another province.

In Ümraniye, Syrians with registration issues and who are unable to get support with registration from NGOs are further deterred from making use of other protection services<sup>173</sup> as their primary need to access any protection services remains getting assistance with registration.

### Eligibility Criteria and Service Delivery Capacities at District-Level

A major barrier to effective service provision is related to the eligibility criteria and availability of different specialised services for refugees. At present, major public protection and social assistance schemes exclusively target children, persons with disabilities, women and the elderly (SSC) or consider economic vulnerabilities (SASF, municipalities) with respect to social assistance. ESSN's focus on demographic criteria, i.e. large households with multiple dependents (e.g. households with more than four children, or 1.5 dependents for each abled adult) put those smaller households at risk of exclusion from regular social assistance.

The issue is aggravated by a lack of eligibility or unclear access pathways to existing services for refugees under IP and those with residence permits, namely to Social Service Centre assistance, Public Education Centre courses, and social assistance provided by SASF and municipalities. The programmes funded by international donors and implemented by state agencies and non-governmental organisations at district-levels are mainly aimed at Syrians under TP. Consequently, other registered communities as well as unregistered

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<sup>173</sup>PRGA KII Syrian Male Community Leader (29/06/2019), FGD Service Provider, Ümraniye (05/07/2019)

refugees in Ankara and İstanbul cannot be adequately supported. This further puts pressure on district-level actors who are limited in their abilities to respond to the needs of refugees other than Syrians.

Furthermore, service delivery capacity in the districts suffers from limited targeted interventions designed to address complex (child) protection issues and sensitive or under reached groups. There is a lack of policy driven, dedicated response mechanism at district-levels with a mandated responsible lead agency to address issues such as child labour, school drop-outs and child marriages which are primarily handled by the Social Service Centres. However, the SSCs are primary duty bearers to identify and respond to *all* protection issues including child protection issues, and as such stretched in service delivery capacity to child protection issues (for more see page 61- [The Role and Response Capacity of Social Service Centres in this section](#)). Additionally, a lack of gender-sensitised criteria targeting single men, LGBTI refugees (children as well as adults) and a lack of technical service-delivery capacity which addresses the needs of these groups intrinsically puts them at risk of exclusion from social services and assistance.

Whilst non-state actors do provide referrals within the NGO community to specialised actors, such as in the areas of counselling, provide Individual Protection Assistance and Special Needs Fund, long-term solutions cannot be put in place due to the lack of a broader eligibility which would take into consideration the needs of Syrians and non-Syrians by public actors.

The existing capacities of NGOs are not sufficient to respond to all groups that are at risk of exclusion from state services in addition to their limited operational space to provide services to unregistered refugees. Gaps were noted by NGO frontline workers in the areas of a special needs fund for chronic health issues, regular medication expenses, and covering the costs of life-saving operations for unregistered refugees.<sup>174</sup> In addition to this, not having targeted tools and funds for assistance with basic needs is an issue, considering it is this which is requested most by refugee communities.<sup>175</sup> Additionally, the limited access of males and LGBTI refugees to protection services observed in all districts indicates the need to develop a service provision capacity, including targeted outreach, aimed at these two groups.

### Lack of Clarity/Changes in Policies and Their Implementation at District-Level

Frequently changing policies at national and district-levels, differing access pathways and scope of services available to refugees with different registration statuses impairs the reliability of information available on rights and assistance and means that refugees resort to alternative information sources. A number of policy-related challenges noted in the course of this study are as follows:

- In Ankara, NGO frontline workers noted challenges in facilitating access to education in public schools and to training courses in Public Education Centres. For unregistered refugees, due to the lack of a legal framework in place, a student's registration is at the discretion of school administrations. This causes inconsistencies in access and requires persistent advocacy by NGO frontline workers.<sup>176</sup>
- Reportedly, the status determination exams (*seviye tespit sınavı*) for children with residence permits prior to registration in public schools to determine their respective school grades is no longer in operation since early 2019. Currently, the alternative access pathway remains unclear.<sup>177</sup>

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<sup>174</sup>PRGA KII Service Provider, Keçiören, Ankara (22/04/2019)

<sup>175</sup>PRGA FGD Service Provider, Avcılar, (06/05/2019), FGD Service Provider, Ümraniye (05/07/2019)

<sup>176</sup>PRGA KII Service Provider, Keçiören, Ankara (13/05/2019)

<sup>177</sup>Ibid.

- The limited number of language courses in Public Education Centres in Keçiören and Altındağ would lend itself to the establishment of language courses by NGOs and the municipalities. However, the certifications provided by these agencies need to be recognised and verified by the Provincial Directorate of National Education. This requires bilateral agreements between NGOs, municipalities and the PDoNE which, while it does happen, appears to take a long time.<sup>178</sup>
- According to a non-Syrian refugee community leader (with a short-term residence permit), the language courses in the Public Education Centres are not accessible to people with residence permits.<sup>179</sup>

In Avcılar and Ümraniye, the limited number of NGOs active on the ground are required to coordinate closely with one another in accessing accurate information on district-based policies being implemented on the ground. The most significant issue affecting Syrians in these districts is related to a lack of registration. An internal decree issued by the İstanbul PDoNE allows only registered refugee children to be enrolled in public schools from the 2018-19 academic year onwards, and only in their district of residence. However, a number of public schools in both districts do occasionally admit unregistered children. However, the recognition of their certification is uncertain.<sup>180</sup>

Overall, in all the targeted districts, there is a pressing need for the clarification of district-based policies around the services accessible to those of differing registration statuses. In addition to this, the clear communication of those policies to refugees and other stakeholders such as NGOs is needed.

### Access to Information by Frontline Workers on District-Based Policies & Coordination Mechanisms

As indicated above, accessing accurate information on the types of public services available and the eligibility criteria for refugees with different registration statuses are unclear. This in turn affects the ability of frontline workers in the districts to perform accurate information dissemination and effective referrals. At the field levels, NGOs share information with one another mostly via phone and WhatsApp on how best to navigate and respond to district-based policies and respective changes. As explained above, particularly in the case of unregistered refugees and refugees with residence permits, policies differ amongst public agencies in relation to their respective services on health, education and training courses. Moreover, these policy changes and consequent practices followed at district-level are often based on internal decrees. This limits the ability of NGO workers to follow up on changes on the ground. Consequently, NGO workers rely on bilateral communication with one another and with district-based public actors which they establish via personal contacts and by identifying agencies and staff willing to assist refugees and/or clarify the implications of policies.

Whilst quarterly coordination meetings are seen take place in Keçiören, Ankara among NGOs and district-based public authorities, the differing registration statuses that exist amongst the refugee communities require regular updates on policies and on service pathways applying to different registration statuses. In Avcılar and Ümraniye, NGO frontline workers have noted difficulties in performing referrals to public institutions due to limited coordination primarily with the SSCs. This is reportedly is affected by changing personnel and the impact of local elections which has led to uncertainty and meant that no district-based coordination meeting

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<sup>178</sup>PRGA KII Service Provider, Keçiören, Ankara (18/04/2019)

<sup>179</sup>PRGA KII Iraqi Male Community Leader, Ankara (24/04/2019)

<sup>180</sup>PRGA KII Service Provider, Avcılar, İstanbul (20/05/2019)

was held over a period of months.<sup>181</sup> Accordingly, when coordination did take place, it was heavily based on the efforts of frontline workers to clarify district policies and referral pathways bilaterally with the municipalities, the PDoNEs, public schools and the SSCs.<sup>182</sup>

Overall, in all targeted districts, there are pressing needs to clarify district-based policies and their application to different registration statuses, to establish coordination mechanisms and two-way referral pathways and to define the complementary roles and responsibilities of non-governmental organisations.

### The Role and Response Capacity of Social Service Centres

In line with the MoFLSS's mandate to regulate protection and social services for refugees, Social Service Centres are taking over the response to protection needs while non-governmental agencies are assuming complementary roles at district-level. Nonetheless, the absence of a designated authority to coordinate case management and referrals at province-level causes the SSCs in particular to become stretched between coordination and service provision.<sup>183</sup> According to a source, SSCs with a heavy case load cannot attend to all protection issues thoroughly and in a timely manner. Therefore, addressing complex protection issues such as child labour and marriage, ensuring access to education, and the provision of specialised services to women, men and LGBTI refugees remains a challenge.<sup>184</sup>

The variety of protection issues in the districts affects SSCs' response-time and also the quality of these responses. Whilst SSCs' technical and human resource capacities have increased in time, the service delivery capacities of SSCs across districts differ. The common challenges with regard to the responses by SSCs were noted as:

- Lack of an official mandate to provide assistance to unregistered refugees.
- Limited physical capacity, namely staff, to address the protection needs of refugees.
- Limited knowledge on the rights and available services to eligible refugees other than Syrians.
- Lack of translation/interpretation services and trained staff speaking non-Arabic languages.
- Risk-prioritisation is hampered possibly due to heavy workloads but also technical capacity.
- Use of short-term intervention measures such as recommendation of precautionary measures (*tedbir kararı*) for complex protection issues such as child labour, marriage and school drop-out instead of long-term counselling and follow up with applicants.

In Ankara, SSCs are open to referrals, but cite heavy workloads as the main reason for their service provision to be restricted to precautionary measures (*tedbir kararı*). In addition, the decreasing regularity of follow-up and home visits, instead of long-term support such as counselling and referrals to specialised agencies, is noted.<sup>185</sup> Furthermore, a lack of staff who are able to provide interpretation in languages other than Arabic, and only limited knowledge on the situation of refugees under IP and humanitarian residence affects the quality

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<sup>181</sup>PRGA KII Service Provider, Avcılar (03/05/2019), PRGA FGD Service Provider, Avcılar (06/05/2019), PRGA FGD Service Provider, Ümraniye, İstanbul (05/07/2019)

<sup>182</sup>PRGA FGD Service Provider, Ümraniye, İstanbul (05/07/2019)

<sup>183</sup>PRGA KII Service Provider, Ankara (24/06/2019)

<sup>184</sup>PRGA KII Service Provider, Ankara (17/05/2019)

<sup>185</sup>PRGA KII Service Provider, Keçiören, Ankara (22/04/2019), KII Service Provider, Keçiören, Ankara (13/05/2019)

of services offered by the SSCs to refugees. It also has a negative impact on their reach to diverse groups.<sup>186</sup> Feedback restrictions applied by the SSCs impede NGOs in the access of information as to what stage a referred case might be at in the process, or indeed whether or not it has been received. As a result, this obliges NGO frontline workers to follow up directly with refugees when possible.<sup>187</sup>

In Avcılar, NGO respondents indicated limited communication with the Avcılar SSC. Referrals are primarily facilitated through the 183 hotline. However, the intervention period varies, and risk prioritisation seems not to be in place.<sup>188</sup> The SSC and other district-based public actors are challenged in their ability to respond to referrals for unregistered refugees due to the fact that they do not have a mandate to provide them with services. In Ümraniye, NGO workers also referred to limited contact with the SSC and also noted that the SSC's ability to attend to complex protection issues is inconsistent.<sup>189</sup>

### Barriers to Information Dissemination and Access to Services

Due to institutional limitations on conducting outreach and household visits in Ankara, NGOs communicate with refugee communities via mass events, phone calls, SMS, written materials, and by establishing networks with community leaders and mukhtars. This is done in an effort to mobilise the refugees for self-admission to NGO services. In essence, the mobilisation of refugees through gatekeepers such as community leaders and mukhtars, (who are often men) may limit the access of women and girls to information and support. Persons with physical disabilities are further challenged in accessing information and service provision due to limited mobility that hampers their self-admission to NGO premises. An NGO worker highlighted that 'self-admissions' also restrict direct access to children whose needs are often conveyed by their caregivers instead.<sup>190</sup>

The indirect outreach approach inherently hampers the access of most marginalised groups to services. These groups have been identified by some NGO frontline workers in Ankara as **women and girls confined to the home, people with disabilities, the elderly, (single) men, LGBTI refugees and individuals who refrain from engaging with service providers, such as unregistered refugees.**<sup>191</sup> (Further information on these groups are provided below.)

In İstanbul, most non-governmental organisations are authorised to conduct outreach and household visits. However, for unregistered refugees and for Syrians with registration in other provinces, making use of state services is not possible despite targeted outreach, or the availability of information on services available. Syrian refugees from Avcılar centre pointed out difficulties in following frequently-changing policies and practices at district-level as well as difficulties in accessing reliable information from state service providers in person or from official websites. As such, they rely more on acquaintances from the Avcılar Municipality

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<sup>186</sup>PRGA KII Service Provider, Keçiören, Ankara (13/05/2019), KII Service Provider, Altındağ, Ankara (09/05/2019)

<sup>187</sup>PRGA KII Service Provider, Altındağ, Ankara (09/05/2019), KII Service Provider, Keçiören, Ankara (10/05/2019)

<sup>188</sup>PRGA KII Service Provider (03/05/2019), FGD Service Provider, Avcılar (06/05/2019)

<sup>189</sup>PRGA FGD Service Provider, Ümraniye (05/07/2019)

<sup>190</sup>PRGA KII Service Provider, Keçiören, Ankara (13/05/2019)

<sup>191</sup>PRGA KII Service Provider, Keçiören, Ankara (18/04/2019), KII Service Provider, Keçiören, Ankara (10/05/2019), KII I Service Provider, Keçiören, Ankara (22/04/2019)

(if any), Facebook, Syrian news sites and WhatsApp groups. These are, arguably, not accessible to all refugees due to age, gender norms and limited internet literacy.<sup>192</sup>

### Language Barriers

Language remains a major barrier, with high levels of illiteracy present, particularly among women. For those who seek written information, the limited written and audio information available on services in languages other than Arabic impedes access for non-Syrian refugees. In Ankara, an Afghan community leader pointed to a few NGOs using SMS in Afghan languages (Farsi, Dari, Pashtu) which facilitates their access to information on services.<sup>193</sup> Most refugee participants mentioned that SMS in their native language, voice messages via WhatsApp and direct in-person communication are preferred over written material due to the widespread belief that written information with respect to policies and services is either inaccessible or inaccurate.<sup>194</sup>

In Ümraniye, limited Turkish language skills of refugees and lack of interpretation support at local state offices were noted as major barriers to accessing information and district-level services. The fact that the 182-phone line for hospital appointments operates only in Turkish, and an insufficient number of interpreters in hospitals means that Syrian refugees seek support from local neighbours, NGOs and children who can speak Turkish in order to get an appointment and during hospital visits.<sup>195</sup>

In an FGD, Syrian men identified various issues which complicate undertaking administrative procedures at district-level, such as language barriers, lack of knowledge on the part of public servants and differing practises in state offices. Therefore, such processes as registering at the District Population Directorate (*Nüfus*), collection of documentation to get a house contract, taking over bills, registration for courses in Public Education Centres and use of assistance from the National Employment Agency (İŞKUR) are proving difficult.<sup>196</sup>

### Under-reached Refugee Groups

Women and Girls Confined to the Home: Testimonies of NGO frontline workers indicate that women and girls, including female heads of households are more confined to the home, and are therefore under-reached and underserved by the protection actors. Contributing factors are language barriers, domestic work, a sense of insecurity in the given residence, but also social barriers often enforced by male figures (e.g. limiting access of women and girls to social spaces including the activities held by NGOs) in the households.<sup>197</sup>

People with physical, sensory and intellectual impairments: People with disabilities require structured long-term support via multi-sectoral interventions, depending on the situation, type of impairment etc. Whilst respondents to this study outlined efforts to engage refugees with disabilities, the majority of focus is on health

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<sup>192</sup>PRGA KII Syrian Male Community Leader, Avcılar (02/05/2019), KII Syrian Female Community Leader, Avcılar (06/05/2019), FGD Syrian Women Avcılar Centre (20/05/2019)

<sup>193</sup>PRGA KII Afghan Female Community Leader, Ankara (10/05/2019)

<sup>194</sup>PRGA KII Iraqi Male Community Leader (26/04/2019), KII Afghan Female Community Leader (10/05/2019), FGD Syrian mixed gender adults, Altındağ (13/05/2019)

<sup>195</sup>PRGA FGD Service Provider, Ümraniye (05/07/2019)

<sup>196</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>197</sup>PRGA KII Service Provider, Keçiören, Ankara (18/04/2019), KII Service Provider, İstanbul (02/07/2019)

measures and access to health services. For refugees with disabilities the main issues raised by Syrian participants were difficulties in acquiring disability health reports, low/inaccurate rate of disability determination, limited mobility, inaccessibility of public spaces and the cost of public transport.<sup>198</sup> In addition to this, limited opportunities for skills-building and in the job market due to inconsistent practices and dismissal at course admissions in Public Education Centres as well as in job placement agencies were noted as problems faced by refugees with disabilities.<sup>199</sup>

People with intellectual impairment, and who need special care and education are further challenged as they need a level of care refugee households have difficulties providing. NGO frontline workers referred to the limited special education services available to refugees. Language barriers in public special education centres such as Guidance and Research Centres (RAM) limit effective service provision for refugees. Furthermore, the cost of private centres for special education are not covered for refugees irrespective of registration status.

The Elderly: Elderly refugees often experience challenges in the form of limited language skills and mobility issues, as well as health problems. The elderly refugees met during this study highlighted restricted engagement with the community members other than those in their neighbourhood.<sup>200</sup> Consequently, it could be argued that they are at risk of limited access to information and services for them or of becoming dependent on indirect information and support. Service providers have noted the low turnout of elderly people at protection activities, which indicates the need to develop activities in line with their circumstances, needs and primary concerns. And putting supportive measures in place (i.e. adequate timing, location and space for their attendance, assistance with transportation etc.).

### 3.4 EMERGING TRENDS IN THE PROTECTION CONTEXT AND SERVICES

The following section outlines the changes observed in the protection environment in the targeted districts in the course of the data collection period. It also details the emerging trends, with respect to services provided by non-governmental organisations active in the protection sector, as well as the good practices seen to contribute towards self-reliance and longer-term durable solutions for refugees. The sub-section ties to questions 7 and 9 in the ToR.

#### Changes in the Protection Environment

- Issues with Registration: During the data collection period, registration for TP in İstanbul was at a de facto standstill for over two years. Whilst registration in Ankara was ongoing, it was noted to be selective and undertaken for highly vulnerable cases. In this period, a lack of communication by PDMs on eligibility criteria for Temporary Protection registration in İstanbul and Ankara prevented Syrian refugees from legalising their status in these provinces. This also impeded the ability of non-governmental organisations to convey accurate information about registration processes to the affected refugees. İstanbul and Ankara being closed to IP registration by law; it was observed that non-Syrian refugees acquired short-term and/or humanitarian residence permits or remained unregistered.

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<sup>198</sup>PRGA FGD Syrian mixed gender adults, Altındağ (13/05/2019)

<sup>199</sup>Ibid.

<sup>200</sup>PRGA KII Syrian woman, Avcılar (03/05/2019), FGD Syrian women, Altındağ (16/05/2019)

- The Impact of Local Elections in Turkey: On 31 March 2019, local elections took place in Turkey. This was followed by a new election in İstanbul, which resulted in uncertainty in the province up until late June 2019. The pre- and post-election period saw a shift in the socio-political landscape, i.e. a rise in nationalistic discourse, negative reporting via media channels on refugees, particularly on Syrians, in İstanbul. The impact on the ground was as follows:
  - Deterioration in public opinion among the host community towards refugees.
  - Campaign promises varying from the relocation of refugees from İstanbul to decreasing the provision of aid and access to services for them.
  - Dissemination of news among the Syrian community on relocation to other provinces or the forced return to Syria of unregistered Syrians.
  - The above developments caused refugee communities to refrain from engagement with the host community for fear of causing further social tension.

### Protection Actors' Programming Priorities (Emerging Trends in Service Provision)

- Information Sessions: As service provision is increasingly being defined based on registration status, non-state actors are scaling up information sessions on protection schemes (TP and IP) and registration processes. This is in addition to information sessions on available services in the districts and access pathways to education, health, awareness on civil rights i.e. marriage & divorce and access to legal aid. Some NGOs are also providing information/awareness sessions on women's rights, gender equality, child labour, child marriages, employment, access to the labour market etc.
- Non-governmental actors are increasing efforts in legal assistance and perform referrals to Bar Associations primarily for registration under TP, due to the halt of registrations in İstanbul and also for non-Syrian refugees for issues pertaining to administrative detention. Civil legal cases such as marriage, divorce, violence against women and girls, rental issues and worker's right issues are also referred to the Bar Associations.
- Case Management: A programmatic trend appears to be an increase in the case management component in protection programmes. The programmatic shift entails a thorough assessment of needs on a case by case level, provision of accompaniment/hand holding to public service providers (i.e. hospitals, Bar Associations, education centres) and referrals among protection actors. The reasons behind the shift may be due to a set of complex factors such as enhanced operational space and trust between PDoFLSS and NGOs, as well as increasing acceptance among donors of complex protection needs, but also a need to attend to individual cases in a lack of/inconsistent application of relevant policies and services with an effect on refugees. The needs faced by refugees are often too complex to be responses to through a simple, "one-off" type of support (e.g. Individual Protection Assistance).
- Municipalities are cited as a forthcoming local actor in all districts. A number of NGOs in Ankara and İstanbul have developed partnerships (i.e. embedded programming) with municipalities in Keçiören, Ümraniye and Avcılar building on the increasing role and trust shown in the municipalities by refugees.

### Good Practices

- Turkish Red Crescent launched a pilot programme in order to help improve the livelihoods of Syrian refugees and provide counselling to them in the labour market and also to their employers.

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The programme provides information on worker's rights, on work permit procedures and covers the cost of work permits for registered Syrian refugees.<sup>201</sup>

- UNFPA initiated a community-based programme involving male Syrian volunteers in all districts of İstanbul to raise awareness on gender equality among men and boys.<sup>202</sup>
  - Agencies which provide multi-sectoral, integrated services are reaching a wider audience. Such services are provided by Turkish Red Crescent and include legal assistance, vocational training, language courses, case management, livelihood support and social cohesion activities with the host community. Migrant Health Centres also provide multi-sectoral services, such as primary health care, case management, psychological support, sexual and reproductive health awareness services.
  - Joint ventures were observed between the civil society and SSCs, such as TRC social workers being embedded in the Bağcılar SSC in İstanbul.<sup>203</sup> Whilst it is still in the pilot phase, it introduces a promising prospect for NGOs seeking collaboration with SSCs.
  - Community-led activities utilising the skills and inputs of refugee communities remains limited at present. Currently TRC conducts health information dissemination via Syrian volunteers. Göç-Der in Ankara, and the Refugee Association in Sultanbeyli, İstanbul engage refugee youth and adults in community-led refugee councils. These community-led interventions should be explored further and increased, bearing in mind the operational space and the authorisation of NGOs to conduct activities via volunteers.
  - A number of actors were identified as providing community-based activities. These are notably held by the Migrant Health Centre as well as the Women's Solidarity Foundation (KADAV) and involve the delivery of information sessions and discussion groups in the houses of refugees (including women and girls). Community-based activities noted to increase women's and girls' access to information and assistance and to contribute to community support and solidarity.
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<sup>201</sup>PRGA KII Service Provider, İstanbul (24/05/2019)

<sup>202</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>203</sup>PRGA KII Service Provider, Ankara (24/06/2019)



## 4.COMMUNITY SUPPORT MECHANISMS AND RESOURCES IN THE TARGETED DISTRICTS

This section explores the resources and capacities at community-level which should be built on in order to strengthen protection, resilience and self-reliance among the most marginalised population groups (linked to research question 4 of the ToR for this study) in the targeted districts. The section delves into:

- Community support mechanisms and access to those (bearing in mind the different capacities among refugee groups based on registration status, age and gender);
- Different information sources utilised by refugee communities;
- Modes of communication and support (or lack thereof) with the host community.

### Key Findings on Community Support Mechanisms and Information Sources

- Community support levels vary among refugee communities. Syrians appear to exhibit higher levels of community support compared to Afghans and Iraqis. The support modalities were predominantly noted as the sharing of information on services and assistance.
- Information sharing was noted to be most common among Syrians in the targeted districts. Phone, WhatsApp groups, Facebook pages and Syrian online websites are the most commonly used. These modes are utilised to a lesser extent by women, girls and the elderly.
- A decrease in trust in formal information channels was raised by Syrians in Ankara, Avcılar and Ümraniye with the exception of the municipalities and trusted NGOs. This was linked to changing policies and practices at district-level.
- Afghan and Iraqi participants viewed formal sources such as NGOs, the municipalities, and, to a lesser extent, local associations established by fellow refugees as sources of support and information.
- Limited community support and information sharing was noted in the case of Afghan and Iraqi refugees, possibly due to limited information and the scarcity of service provision targeted at these communities.
- Ethnicity-based differences and sub-identities among Afghans and Iraqis appear to hinder intra-community support in Ankara. Refugees of Turkman and Uzbek origin were noted to access information and support more successfully due to their language and kinship affiliations to Turkey.
- Province-based affiliations were observed to cause small community networks to emerge among Syrians in Avcılar and Ümraniye, where refugees from the same or similar provinces and backgrounds exhibit community support.
- Service providers referenced community leaders as access channels to a wider number of refugees. On the other hand, some refugee participants reported favouritism on the part of some of the community leaders, particularly in Ankara and Ümraniye, and cited this behaviour as putting up barriers to information and support.
- Syrian imams and also Syrian small-shop owners were regarded as primary gatekeepers to accessing local charity mechanisms in Ümraniye. Access to these mechanisms is particularly challenging for women, and also for Syrians who have no connection with these gatekeepers.
- Women and girls referred to their social circle, relatives, neighbours, teachers from the host community, co-workers (i.e. Afghan girls) and males in the household as information sources.

- Some female refugees act as intermediaries to other women in providing information on available services. These are for example, married women or women with registration ID, or higher level of education and social network and are therefore perceived to have a level of stability.
- Teachers in public schools and also in public education and vocational centres were referred to as information sources by both Syrian and Afghan girls.
- The level of inter-community relations between refugees was explored in Ankara. Accordingly, different refugee communities have limited incentives to come together unless for common initiatives (i.e. courses, community-based activities) led by district-based organisations. The large range and amount of service provision being focused towards registered Syrian refugees creates confusion and resentment amongst the Afghan and Iraqi communities.
- In all districts, relations with the host community were seen to take place on personal levels. Language barriers and anti-refugee sentiments which are on the rise following the economic downturn and local election period in 2019 have increased introverted tendencies among refugee communities thereby resulting in limited interaction with the host community.

## 4.1 COMMUNITY SUPPORT MECHANISMS AND RESOURCES IN KEÇİÖREN AND ALTINDAĞ

Syrians in Ankara are concentrated in the Altındağ district and they primarily originate from the provinces of Aleppo and Idlib. A recent research conducted by the Economic Policy Research Foundation of Turkey (TEPAV) in the Önder neighbourhood in Altındağ indicates that Syrians mimic their social experiences and way of life from their home country. In addition to this, they exclusively communicate with fellow Syrians, shop from Syrian markets and do not often commute outside of their neighbourhood.<sup>204</sup>

Field consultations indicate that Syrians support one another primarily by sharing information on services. Syrian participants also displayed a high level of communication through phones and several WhatsApp groups. In this way, they share information on services and changing policies and also on procedures at district level.<sup>205</sup> The views of the service providers are in line with the Syrian respondents around the rapid dissemination of information among Syrians, particularly via WhatsApp and private Facebook pages. However, also mentioned is the risk of misinformation being spread through social media channels,<sup>206</sup> as well as the risk of excluding those with limited access to the internet or those with low internet literacy. A Syrian woman mentioned the fact that she finds it necessary to validate the accuracy of information disseminated through WhatsApp with NGO and municipality workers.<sup>207</sup>

Despite the range of formal information available on services for Syrians under TP and also the provision of such services as interpretation support offered at hospitals etc., Syrians appear to consider their fellow country men and women as the primary source of support and information. Consequently, formal information and guidance provided by organisations in the field has gradually become secondary to the news as circulated among refugee communities. This is partially due to the fact that frequent changes in policies and arbitrary

<sup>204</sup>TEPAV, İstanbul’da Suriyeliler ve Savaş Sonrası Suriye Gethtoları ‘Syrians in İstanbul and Post- War Syrian Ghettos’, June 2019, accessed via [https://www.tepav.org.tr/upload/files/1561967648-6.İstanbul\\_da\\_Suriyeliler\\_ve\\_Savas\\_Sonrasi\\_Suriye\\_Gettolari.pdf](https://www.tepav.org.tr/upload/files/1561967648-6.İstanbul_da_Suriyeliler_ve_Savas_Sonrasi_Suriye_Gettolari.pdf)

<sup>205</sup>PRGA FGD Syrian women, Altındağ, Ankara (16/05/2019)

<sup>206</sup>PRGA KII Service Provider, Keçiören, Ankara (22/04/2019), KII Service Provider, (10/05/2019), KII Service Provider, Keçiören, Ankara (18/04/2019)

<sup>207</sup>PRGA FGD Syrian women Altındağ, Ankara (16/05/2019)

practices has diminished trust in the formal information circulated, resulting in the refugees seeking support from each other.

The community support observed among refugees varies according to respondents. While some participants (i.e. service providers) highlight both male and female community leaders as active in reaching out to service providers,<sup>208</sup> other participants (refugees) are of the view that support and communication remains limited due to the scarcity of assistance and services available to them (mainly for unregistered refugees).<sup>209</sup> A young Afghan girl stated that:<sup>210</sup>

**‘We speak most about daily chores. If there is distribution, or new information about *kimlik*, families keep it to themselves. Before we were closer, now if there is a chance of support, we would even argue with my sister’.**

There is further concern raised by an NGO frontline worker about the gatekeeper status of certain community leaders. Accordingly, some community leaders appear to advocate on services for groups with ethnic kinship and also for a number of affiliated families for registration or access to aid.<sup>211</sup> An Afghan community leader noted that competition between the different ethnic groups present, in conjunction with the limited assistance available to them, means that support and information sharing remains limited to family and relatives in the Afghan community. The unregistered Afghans remain ‘invisible’ to the state service providers. In that sense, according to a respondent, Afghan refugees with IP registration in Ankara are effectively a communication channel for the rest of the unregistered Afghan relatives and friends.<sup>212</sup>

Where men and boys are relatively free to interact and acquire information in society, it is often more challenging for women and girls to access information themselves due to the gender roles attributed to them, for example as care takers and responsible for household duties. They are also less visible in the community. Female participants in the study indicated that their sources of information are mostly neighbours, relatives, and males in the household.<sup>213</sup> Afghan girls spoke about the ‘relative’ freedom of movement of married women compared to single women and young girls. Married women are more engaged in seeking support and information in the community, mainly from non-governmental organisations and local charities.<sup>214</sup>

Neighbours from the host community, mukhtars, teachers, relatives and friends from both the host community and their own communities are often identified as community support links by young boys.<sup>215</sup> Afghan girls referenced their primary source of support and information as being neighbours from the Afghan and local community as well as relatives.<sup>216</sup>

With regard to relations between refugee communities, the testimonies of Syrian and Afghan refugees point to little incentive to communicate unless brought together by common causes such as language courses or meetings organised by non- governmental organisations.<sup>217</sup> A participant stated that the volume of service

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<sup>208</sup>PRGA KII Service Provider, Keçiören, Ankara (26/04/2019) , PRGA FGD Service Provider, Keçiören, Ankara (24/06/2019)

<sup>209</sup>PRGA KII Afghan Female Community Leader,(10/05/2019), PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

<sup>210</sup>PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

<sup>211</sup>PRGA KII Service Provider, Altındağ, Ankara (09/05/2019)

<sup>212</sup>PRGA KII Afghan Female Community Leader, Ankara (10/05/2019)

<sup>213</sup>Ibid.

<sup>214</sup>PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

<sup>215</sup>PRGA FGD mixed nationality boys (13-17 years old), Ankara (26/04/2019)

<sup>216</sup>PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

<sup>217</sup>PRGA KII Afghan Female Community Leader, Ankara (10/05/2019), Iraqi Male Community Leader, Ankara (24/04/2019)

provision geared towards Syrians creates perceptions such as the existence of favouritism, leading to increasing resentment towards the availability of services in Arabic and Syrians' relatively easier access to education and health services.<sup>218</sup> The vast number of programmes primarily targeting registered Syrians for skills-building courses by Public Education Centres was raised by an Iraqi participant as a source of confusion, as this, in his opinion encourages the Iraqi community to become alienated from the rest of the refugee communities.<sup>219</sup> In this vein, the 'visibility' of Syrians as the most populous refugee community, and their seemingly easier access to services may pose a barrier to further interaction between the communities. A public service provider noted the increased likelihood of conflict among refugee communities due to the dynamics above and noted:<sup>220</sup>

**'On one hand, the locals consider all refugees as Syrians, as such they are all susceptible to reaction from the host community (*in the light of anti-Syrian sentiments*), on the other hand refugee communities are concentrated in different locations, they do not meet. They speak different languages, only if they learn Turkish may there be a chance to increased communication.'**

With respect to the relations with the host community, all refugee participants described relations as good on an individual basis and stated that they interact with the host community to a limited extent given the language barrier. These interactions are further limited due to the rising nationalistic and anti-refugee sentiments the local elections brought about in Turkey, particularly towards the Syrians. During the study, a common issue raised by Syrian participants was on the probability of forced return to Syria and to other cities in Turkey, in the wake of the post local election process, as they have heard among their social circles and on social media.

## 4.2 COMMUNITY SUPPORT MECHANISMS AND RESOURCES IN AVCILAR

Syrians in Yeşilkent in, Avcılar mostly come from northern Syria, and the rural country side of Aleppo (Afrin) and now reside in a host community who themselves migrated to İstanbul from central Turkey in search of better job opportunities. The Yeşilkent neighbourhood, where SCI operates in Avcılar, is more disadvantaged compared to the centre of the district. It has less community areas for socialisation and less service provision from state and non-state actors. There are also a number of precarious workplaces and sites nearby (e.g. construction sites, auto-repair areas '*oto sanayi*', and manufacturing workshops).

The unfavourable conditions noted above coupled with notable difficulties experienced on a day-to-day basis adversely affects community support and the engagement of Syrians in the neighbourhood, particularly women and children. Consultations indicate that (married) women are the most visible in the community, running daily chores and taking children to and from school. Home care responsibilities keep the elderly and adults busy and young women spend more time at home.<sup>221</sup> Syrian women listed a lack of safe places for themselves and for their children in the neighbourhood and their daily responsibilities as barriers to their engagement in the community.<sup>222</sup> According to an elderly woman from Syria, the conservative Syrian culture has a negative impact on young women and girl's engagement in daily life in the community.<sup>223</sup>

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<sup>218</sup>PRGA KII Afghan Female Community Leader Ankara, (10/05/2019)

<sup>219</sup>PRGA KII Iraqi Male Community Leader (24/04/2019)

<sup>220</sup>PRGA KII Service Provider, Keçiören, Ankara (10/05/2019)

<sup>221</sup>PRGA FGD Service Provider, Avcılar (06/05/2019)

<sup>222</sup>PRGA FGD Syrian women from Yeşilkent, Avcılar (22/05/2019)

<sup>223</sup>PRGA KII Syrian woman, Avcılar (02/05/2019)

The SCI Baseline Assessment conducted in 2018 in Avcılar pointed to ‘social circle’ as the least utilised source of information (19%) in comparison to the local authorities (45%) and NGOs (23%) among the Syrian community.<sup>224</sup> The statements of service providers and Syrian participants in this study indicate an expansion of the ‘social circle’ and an increase in the sharing of information on services and communication among the refugee residents of Yeşilkent following the launch of the Avcılar Municipality Service Centre in the neighbourhood. The Centre at present hosts SCI and WALD in addition to a social worker from the Avcılar Municipality, which offer the provision of protection services and social assistance. An NGO frontline worker highlighted that the Service Centre has turned into a support point where Syrian residents bring one another as well as their Turkish neighbours.<sup>225</sup>

Female participants from Yeşilkent mentioned close family circles, relatives, neighbours, some teachers, the Avcılar Municipality and non-governmental organisations in the neighbourhood as trusted sources of support and information.<sup>226</sup> On the other hand, despite these sources, Syrians in this neighbourhood most of whom have registration issues cannot make use of most services. Moreover, persistent poverty in numerous households and the peripheral location of the neighbourhood constitutes barriers against Syrians’ ability to commute outside of the neighbourhood to make use of services that are provided elsewhere in Avcılar.

A sense of a lack of physical and social safety prevalent in the neighbourhood, coupled with social norms, appear to hinder girls’ (in particular adolescents) freedom of movement. A 15-year old Syrian girl noted that, due to a fear of the outside neighbourhood, (i.e. a lack of safe public spaces, caregiver’s concerns over her safety) her social circle is limited to relatives, friends and some neighbours from the host community with whom they spend time at home or in front of their building.<sup>227</sup> Syrian women expressed concerns over their children’s safety while commuting to their school, which is located on a main road. However, most households cannot afford to pay school bus fees and they therefore need to accompany small children to and from school.<sup>228</sup>

Boys appear to have more direct access to the outside community compared to girls. Syrian women point to boys being outside spending time with peers and also at work,<sup>229</sup> which increases their social circles but also puts them at risk of discrimination, maltreatment and exploitation. The boys from Avcılar identified a variety of community support and information sources such as friends, family members, peers from the host community and employers (in the case of boys engaged in child labour).<sup>230</sup>

Province-based communal structures appear to shape community relations among Syrians in Avcılar. According to a Syrian respondent from central Avcılar who was active in a Syrian community-based organisation, cultural and social backgrounds affect the level of community support and relations also among Syrians in the district:

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<sup>224</sup>SCI Baseline Assessment, Strengthened Protection and Wellbeing Among Refugee, Youth and Adults in İstanbul and Ankara, 2018.

<sup>225</sup>PRGA FGD Service Provider, Avcılar (06/05/2019)

<sup>226</sup>PRGA FGD Syrian women from Yeşilkent, Avcılar (22/05/2019)

<sup>227</sup>PRGA KII Syrian girl (15 years old), Avcılar (21/05/2019)

<sup>228</sup>PRGA FGD Syrian women Yeşilkent, Avcılar (22/05/2019)

<sup>229</sup>PRGA FGD Syrian women, Avcılar Centre (20/05/2019)

<sup>230</sup>PRGA FGD Syrian boys, (13-17 years old), Avcılar (21/05/2019)

**‘We come from different provinces in Syria. We have different life experiences; this makes it difficult for us to come together. Damascus and rural Aleppo ways of life are very different. When we have tried to meet (*in Avcılar*) with fellow Syrians from different provinces in Syria, it has been a challenge.’**

The social-economic similarities (e.g. both Syrians and the host community being migrants, poverty experienced at household level, Kurdish language common to both Syrians and a part of the local community) sustain a level of co-existence between Syrians and the host community in the neighbourhood of Yeşilkent.<sup>231</sup> On the other hand, inter-community relations appear to take place on personal levels due to language barriers and competition for jobs.<sup>232</sup> The misinformation among the Turkish community on the services and on benefits refugees are eligible for compounds the distance between Syrians and the host community.<sup>233</sup>

### **4.3 COMMUNITY SUPPORT MECHANISMS AND RESOURCES IN ÜMRANIYE**

The Syrian population in Ümraniye is diverse and is composed of refugees from Damascus, Aleppo, Deir ez Zor, Haseke and Idlib. An NGO frontline worker noted that the conservative culture of the host community residents in Ümraniye is a prominent factor in encouraging refugees, particularly from northern Syria, which has similar conservative values and a relatively ‘closed’ way of living, to settle in the district and continue to lead similarly enclosed lives.<sup>234</sup>

The Topağacı neighbourhood where SCI is operating is at the northern edge of the district. According to a host community member, the availability of work in the informal market, acceptance by the host community and cheaper rents has driven Syrians to move to this neighbourhood and establish small shops, butchers, and electrical shops which, he suggested, with time have turned into a support network among Syrians.<sup>235</sup> Conversely, a Syrian community leader pointed out that the differences between Syrians who originate from different provinces and the sub-identities deriving from different social and provincial backgrounds adversely affects community support among Syrians in Ümraniye.<sup>236</sup>

In all meetings undertaken with Syrian adults, the participants mentioned access to information via intermediaries, such as Syrians with established connections, Syrian imams and Syrian shop owners. These three sources are considered to be most knowledgeable about available services in the district. A male community leader highlighted small shops, particularly Syrian owned markets (*bakkal*) as a key source of information in the community as follows:<sup>237</sup>

**‘Here small shop owners, particularly Syrian ones have information on assistance. They let the community know if there is a free service. I would either get information from them or spread news through them. Women, men, children - at a certain point in the day they all pass by the small shops.’**

On a similar note a Syrian woman pointed to small shop owners as knowledgeable about in-kind support such as diapers and milk, in addition to knowing about charities making distributions in the district. However, some

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<sup>231</sup>PRGA KII Avcılar Municipality, Avcılar (03/05/2019)

<sup>232</sup>PRGA KII Avcılar Municipality, Avcılar (03/05/2019), FGD Syrian women Yeşilkent, Avcılar (22/05/2019)

<sup>233</sup>PRGA KII Avcılar Municipality, Avcılar (03/05/2019)

<sup>234</sup>PRGA FGD SCI Field Team, Ümraniye (05/07/2019)

<sup>235</sup>PRGA KII Pharmacy, Ümraniye (05/07/2019)

<sup>236</sup>PRGA Syrian Male Community Leader 1, Ümraniye (29/06/2019)

<sup>237</sup> Ibid.

other Syrian participants are of the opinion that the information shared by these small shop owners is not always reliable and they only inform certain people, based on personal preference.<sup>238</sup> Whilst no risks or barriers pertaining to gender were raised with regard to male local gatekeepers (e.g. imams, shop owners, intermediaries) by Syrian women, the highlighted sense of favouritism and the required connection to the gatekeepers carry inherent risks for women.

The local support mechanisms and sporadic distributions by charities as described previously (Section 3.2.3.1 Local Support Networks and Foundations in Ümraniye) appear to extend to refugee communities. However, the participants who are aware of these distributions, for example, did not agree on a clear criteria or specific target group benefiting from disseminated information or distributions in the district. A Syrian man mentioned Syrian imams in Sabır and Meyvelibahçe Mosque as intermediaries to distributions who, in his opinion are not fair and do not reach out to Syrians who are not affiliated with themselves.<sup>239</sup>

The gatekeeper status and implied favouritism voiced by Syrian respondents regarding a number of community leaders (e.g. Syrian imams, shop owners) requires further scrutiny, as none of the identified imams or small shop owners agreed to meet for this study. However, the comments of other Syrian shop owners and community members indicate the likelihood of a lack of transparency in the support network established by the aforementioned gatekeepers together with local foundations and charities.

According to the respondents, the dissemination of information takes place via many channels, particularly social media, i.e. Facebook and WhatsApp. An NGO worker pointed to a Facebook group active for Ümraniye with over 7000 subscriptions,<sup>240</sup> while a male community leader mentioned that he moderates several WhatsApp groups of more than 1000 participants including some hundreds from Ümraniye. The topics discussed in the groups were regarding rentals, contracts, information about registration, charities which provide cash or in-kind assistance<sup>241</sup> and the groups were predominantly used by Syrian men.<sup>242</sup> According to the respondent, there are also women active in these WhatsApp groups and some choose to introduce themselves as men as a protection strategy. The community leader also did not seem to have an issue with the sharing of participant's personal information, which could have negative implications (particularly for the females in the group), neither did he appear to be overly concerned with accuracy of information. This may indicate that the relevance of information acquired possibly surpasses the level of risk and potential harm the social media channels may pose (i.e. inaccurate information, fraudulent acts, dissemination of personal contacts).

Syrian women listed the sharing of information on new services, as well as on in-kind support and on registration as primary means of support within the community. They also mentioned they provide moral and material support to newcomers and neighbours.<sup>243</sup> Whilst Syrian men cited the active use of social media and online channels such as WhatsApp groups and Facebook as being their main means of support and information.<sup>244</sup> The FGD with Syrian women indicate a level of knowledge on these tools despite the fact that

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<sup>238</sup>PRGA KII Syrian Male Community Leader 2, (04/07/2019), Syrian Male Community Leader 3, Ümraniye (05/07/2019)

<sup>239</sup>PRGA KII Syrian Male Community Leader 2, Ümraniye (04/07/2019)

<sup>240</sup>PRGA FGD Service Provider, Ümraniye (05/07/2019)

<sup>241</sup>PRGA KII Syrian Male Community Leader 1, Ümraniye (29/06/2019)

<sup>242</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>243</sup>PRGA FGD Syrian women, Ümraniye (03/07/2019)

<sup>244</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

they are mainly utilised by men and youth in the household.<sup>245</sup> Syrian women noted neighbours, including from the host community, relatives, and some teachers in public schools, news communicated in bazaars, by the municipality and NGOs such as SCI, Yuva and ASAM as sources of information.

Young Syrian girls identified fellow Syrians as primary sources of information. They also pointed to news spread in bazaars, in language and Qur'an courses, and through home visits between neighbours and relatives.<sup>246</sup> A young girl affirmed that peers continuing courses and trainings are also sources of information to them around such activities.<sup>247</sup> Whilst the group did not agree fully, most girls considered social media (particularly Syrian websites) as an effective channel for information dissemination among the youth.<sup>248</sup>

Young boys appear to be more engaged in the community through running errands for the household and working. As such, the information channels raised by boys show similarities to that of adults. A young boy mentioned WhatsApp groups, his peers, employers and local Syrian shops as sources of information on services.<sup>249</sup> NGOs, communication over the phone and WhatsApp, in addition to exchanges in mosques and local markets were raised as information channels utilised by Syrian men.<sup>250</sup> A Syrian man identified WhatsApp groups as a useful way to learn more about daily chores, i.e. rentals or documentation needed to issue driver's licenses. In this way, they learn best from peers who have been through the process of obtaining documents and engaging with local authorities.<sup>251</sup>

The limited number of services available, in conjunction with the priorities of the Syrian community (i.e. support with registration, financial and in-kind assistance), appears to drive Syrians to resort to community networks and local associations for information and assistance. A Syrian woman highlighted that NGOs do not provide assistance on basic needs (food, NFI, financial assistance) and this leads to low turnout at other activities provided by NGOs for Syrians who are instead preoccupied with making ends meet.<sup>252</sup>

Nine out of ten Syrians in İstanbul live on the European side, with Syrians residing in the Ümraniye district appearing to be connected to the developments, assistance and information flow from persons and organisations based in the European side. The SCI Baseline Assessment conducted in Ümraniye in 2018 identified a number of associations located in the European side of İstanbul in the Fatih district, such as the Himma Foundation and the Şam Alimleri Foundation that assist Syrians in Ümraniye.<sup>253</sup> Similarly, this study identified shop owners and legal experts in Fatih as information and support sources. A Syrian community leader mentioned that he often consults with shop owners and Syrian lawyers based in Fatih to confirm or validate new information regarding services for Syrians.<sup>254</sup>

Similar to the comments in other targeted districts, relations with the host community are experienced on a personal basis in Ümraniye. An NGO frontline worker reiterated that the closed community structures and

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<sup>245</sup>PRGA FGD Syrian women, Ümraniye (03/07/2019)

<sup>246</sup>PRGA FGD Syrian girls (13-17 years old), Ümraniye (03/07/2019)

<sup>247</sup>Ibid.

<sup>248</sup>Ibid.

<sup>249</sup>PRGA KII Syrian boy (14 years old), Ümraniye (03/07/2019)

<sup>250</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>251</sup>PRGA KII Syrian Male Community Leader 3, Ümraniye (05/07/2019)

<sup>252</sup>PRGA KII Syrian Female Community Leader, Ümraniye (03/07/2019)

<sup>253</sup>SCI Baseline Assessment, Strengthened Protection and Wellbeing Among Refugee, Youth and Adults in İstanbul and Ankara, 2018.

<sup>254</sup>PRGA KII Syrian Male Community Leader 1, Ümraniye (29/06/2019)

conservatism prevalent in Syrian and host community cultures hinders the development of closer inter community relations.<sup>255</sup> Syrian men highlighted the deteriorating views of the Turkish community towards Syrians as a factor of limited relations with the host population and that the downturn in the economy, rising prices and unemployment is increasingly associated with the Syrian refugees.<sup>256</sup> The respondents, whilst not in agreement, outlined the friendships developed among women, children and youth as a promising basis for developing inter-community relations. Young Syrian girls mentioned their Turkish friends in school and in the neighbourhoods and also some teachers as aids to establishing stronger relations with the host community.<sup>257</sup>

In the light of the aforementioned findings, the following can be put forward as potential resources (i.e. persons and actions) to enhance community support mechanisms and information dissemination among refugees and the host community:

### **Resources for Community Support and Increased Information Dissemination**

- Engagement with and information dissemination via municipalities which are considered a source of information in all districts.
- Targeting women active in the community such as existing beneficiaries, married women as they appear to move more freely in the community in access to peers, adolescent girls, marginalised women and girls, newcomers.
- Providing dedicated activities and spaces for host and refugee children and women to engage with one another.
- The mobilisation of teachers, school administrations and course administrations in information provision as well as to improve community relations between refugee and host communities.
- Engaging with community leaders in utilising WhatsApp groups for information dissemination.
- Increasing common activities engaging Syrians, Afghans, Iraqis and other refugee groups.
- Identification of community leaders, relatives, key persons in households and in the community, who are acknowledged to channel news to girls and women.
- Mapping of local markets, small shops and local associations channelling news and in-kind support to refugees in all districts.
- Undertaking an assessment of capacities and risks (i.e. social and gender barriers) with respect to the abilities of local associations and community leaders in reaching out to a wider audience, including women and girls.

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<sup>255</sup>PRGA FGD SCI Field Team, Ümraniye (05/07/2019)

<sup>256</sup>PRGA KII Syrian Male Community Leader 1 (29/06/2019), KII Syrian Male Community Leader 3, Ümraniye (05/07/2019)

<sup>257</sup>PRGA FGD Syrian girls (13-17 years old), Ümraniye (04/07/2019)

## 5. REFUGEE GROUPS WITH PROTECTION NEEDS

The following section sheds lights on specific groups in need of protection services in the targeted districts and the most prevalent protection risks encountered by refugee communities. The narrative aims to delve into risks and needs that stem from legal, social, economic status, age and gender factors to the extent possible. This ties to the sub-research questions 2,3 and 5 of the ToR for this study.

### 5.1 REFUGEES WITH REGISTRATION STATUS ISSUES

Ankara is host to refugees with various different registration statuses including those who are unregistered. The unregistered refugees (mainly composed of Afghans in Ankara) have little to no access to public services. The number of growing IP transfers of Afghan refugees from satellite cities to the province over time is a pull factor other Afghans (e.g. family and acquaintances of settled Afghans, the presence of an established Afghan community) to come to live in Ankara.

An emerging contributing factor to the lack of registration of non-Syrians may be the decentralisation of refugee-status determination in 2018, i.e. the handover of the refugee status determination process from UNHCR-ASAM (in Ankara) to DGMM on 10 September 2018 and the consequent delegation to PDMMs in each province. Consultations for this study indicate that PDMMs have been providing written notifications to refugees that no IP registration is undertaken in Ankara and İstanbul. However, they do not provide information on ‘open’ satellite cities’ where non-Syrians can get registered.<sup>258</sup> In that sense, the decentralisation of the registration process appears to have caused gaps in information dissemination regarding the ‘open cities’ and in formal guidance in the registration process on the part of PDMMs.<sup>259</sup>

There are further social barriers against registration and which compound the situation of unregistered refugees in Ankara. An Afghan community leader mentioned the following on barriers against moving to satellite cities:<sup>260</sup>

***‘Afghans do not know about identity cards, registration procedures when they enter Turkey. Most find friends and family in Ankara. Once they arrive, they are supported by their fellow country men and women and start to settle where other Afghans live. They are cut off from information about registration. In time, it becomes difficult to move once you have a routine, a sort of stability. How can they move to (satellite) cities where they do not know anyone for the sake of the possibility of education, jobs? They wonder, “what if we cannot register, cannot find jobs?” Only if there is continuous guidance and support from organisations, may they move to satellite cities – to have a ‘legal’ life...’***

Additionally, a significant number of short-term residence holders (mainly Iraqi Arabs) are left to maintain themselves with their own resources in Keçiören, Ankara. Most short-term residents’ health insurances have expired, and they cannot benefit from social assistance schemes.<sup>261</sup>

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<sup>258</sup>PRGA KII Service Provider, İstanbul (25/05/2019), FGD Service Provider, Keçiören, Ankara (24/06/2019)

<sup>259</sup>PRGA KII Service Provider, Ankara (24/06/2019)

<sup>260</sup>PRGA KII Afghan Female Community Leader, Ankara (10/05/2019)

<sup>261</sup>PRGA KII Service Provider, Ankara (10/05/2019), PRGA KII Iraqi Male Community Leader, Ankara (26/04/2019)

Given the numerous issues with registration, most refugees are in need of counselling and legal assistance if they are to make informed decisions on their future. In the case of moving to satellite cities, the unregistered non-Syrian refugees require information on open satellite cities where there is community and organisational support as well as livelihood opportunities. They need financial assistance to cover costs related to transportation and expenses to cover the preliminary months in the satellite cities until they are eligible to work formally or receive social assistance.

While the registration process has reportedly slowed down in Ankara for the SuTP, it is still ongoing. Respondents from non-governmental organisations indicate Syrians with serious health conditions, single women, female-led households, and Syrians admitted to higher education are prioritised in their application for TPID in Ankara.<sup>262</sup>

## AVCILAR & ÜMRANIYE, İSTANBUL

TP registration for Syrians has become selective in İstanbul since 2016<sup>263</sup> and came to a halt as per the policy change announced in July 2019. During the data collection period for this study, NGOs active in the field pointed to a de facto ‘suspension’ in registrations and difficulties in acquisition of Temporary Protection IDs. In this period PDMs did not issue clearly defined criteria for registration, while the relatively small number of Syrians who were given IDs in İstanbul were refugees with life-threatening health risks, chronic diseases requiring regular treatment, survivors of violence, unaccompanied minors, (for a period) or pregnant women. Secondly, NGO respondents highlighted that transferring registration to İstanbul for family unification has almost ceased, even in cases in which most of the family members have TP registrations in İstanbul.<sup>264</sup>

A legal expert and an NGO service provider pointed to new policies introduced by the PDMs in İstanbul, to the effect that TPID renewals require civil documentation (e.g. Syrian ID or passport or birth certificate) which some Syrians do not possess and were not asked to provide in their original screening.<sup>265</sup> This change in policy may increase the need for legal aid and necessitate court procedures to assist TPID renewals in the province.

Some of the registration issues Syrians face in İstanbul are related to moving registration from other provinces for those who have deportation orders that have been put in place in border provinces. These border provinces are where the majority of Syrians enter Turkey. Some Syrians report they (were forced to) sign voluntary return documents and thereupon re-entered Turkey through irregular means. As such they are required to return to border provinces and resolve legal procedures to regularise their status in Turkey.<sup>266</sup>

A 57-year-old unregistered Syrian woman, while explaining her efforts to register in İstanbul, stated that:

***‘When we first came to Kilis from Aleppo 16 months ago, I was made to give finger prints and was immediately deported. Then we entered from Reyhanlı and came directly to İstanbul where my son and his family are registered. We are a family of fourteen, my husband and two daughters who came before***

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<sup>262</sup>PRGA KII Service Provider, Altındağ, Ankara (24/06/2019), KII Service Provider, Altındağ, Ankara (09/05/2019), KII Service Provider HQ, Ankara (26/04/2019), KII Service Provider, Ankara (15/05/2019)

<sup>263</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>264</sup>PRGA KII Service Provider, İstanbul (07/05/2019), PRGA FGD Service Provider, Avcılar (06/05/2019)

<sup>265</sup>PRGA KII Service Provider, Avcılar (02/05/2019), KII Service Provider, İstanbul (23/05/2019)

<sup>266</sup>PRGA KIIs with Syrians in Avcılar.

*me have TP registration in İstanbul. Myself and my grandchildren do not. They told me to go back to Kilis, but no one tells me what to do there. My husband is very sick, I take care of him. I don't even feel safe here, I rarely get out of the house. My neighbour just moved their registration to İstanbul from Mardin, I do not understand why I cannot'.<sup>267</sup>*

A 23-year-old Syrian woman explained she has been trying to register in İstanbul for two years without success. When she heard from sources within the community that 'women who are about to give birth may get registered.', she got pregnant twice in the same year in a hope of being registered in İstanbul; however, she remained unsuccessful.<sup>268</sup> A legal expert confirmed that there was in fact 'a period' during which pregnant women were registered rapidly; however, the policy has changed.<sup>269</sup>

Changing policies and a lack of clarity on the eligibility criteria for TP registration, coupled with inaccurate information on registration processes (which is mostly acquired via informal channels) causes unregistered refugees to resort to harmful practices in İstanbul. Fraudulent acts committed by intermediaries on registration were raised by Syrian participants in Ümraniye and Avcılar. In an FGD with Syrian men in Ümraniye, a participant mentioned how 'intermediaries/middle men' (*simsar*) arrange documentation for registration in another province and then bring the documents back to the Syrians in İstanbul.<sup>270</sup> It appears some Syrians are aware of registration in another province does not ensure access to services in İstanbul, however do so in an effort to have a valid registration ID.<sup>271</sup> On the other hand, according to a Syrian community leader, some Syrians are put under the impression by intermediaries that they will be eligible to rights and services in İstanbul.<sup>272</sup> and they continue to live in İstanbul under the assumption that they will be eligible for services.

## 5.2 CHILDREN

### 5.2.1 CHILDREN'S EDUCATION

According to UNICEF, approximately 400,000 (**40% of) school-aged registered refugee children remain outside of formal education in Turkey.**<sup>273</sup> Whilst there is limited data on unregistered children's rate of participation in formal education, WFP indicates that the rate of unregistered refugee children who are not attending school is 46%.<sup>274</sup> The SCI Baseline Assessment conducted in 2018 indicates that in Keçiören in Ankara and in the districts of Avcılar and Ümraniye in İstanbul, **32% of school aged-refugee children are out of school; of whom 52% are boys and 48 % are girls.**<sup>275</sup> Additionally, an increasing number of boys and girls are dropping out of school after primary school (for figures see Section 2.5 Education and Protection).

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<sup>267</sup>PRGA KII Syrian woman, Avcılar (02/05/2019)

<sup>268</sup>PRGA KII Syrian woman, Avcılar (03/05/2019)

<sup>269</sup>PRGA KII Service Provider, Avcılar (03/05/2019)

<sup>270</sup> PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>271</sup> Ibid.

<sup>272</sup> PRGA KII Syrian Male Community Leader, Avcılar (02/05/2019)

<sup>273</sup>UNICEF, Humanitarian Situation Report Turkey # 34, July 2019, accessed via [https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report\\_Mid-Year%202019.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/UNICEF%20Turkey%20Humanitarian%20Situation%20Report_Mid-Year%202019.pdf)

<sup>274</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

<sup>275</sup>Save the Children International Baseline Report: Strengthened Protection and Wellbeing Among Refugee, Youth and Adults in İstanbul and Ankara, 2018.

The Government of Turkey is gradually closing down Temporary Education Centres (TECs) for Syrian children and transitioning towards incorporating them into public schools. As of June 2019, 14% of Syrian children have continued to education in TECs.<sup>276</sup> The right to education and enrolment pathways vary according to registration status and respective province level-policies. This further poses barriers to refugee children's access to education. The following section lays out their access in line with policies, as well as the risks children face in access to and during education.

## KEÇİÖREN & ALTINDAĞ, ANKARA

Refugee girls and boys face legal, institutional and economic barriers with respect to enrolment in schools. The most severely affected group is unregistered refugee children. Due to their (lack of) registration status, they cannot formally enrol in schools. The only available measure is registration as a guest student which is not a complete solution. The stretched physical capacity experienced by schools and, as previously mentioned, the lack of enabling legal framework often deters administrations to enrol unregistered children.<sup>277</sup>

For unregistered refugees, the lack of validity of transcriptions as 'guest students' is a significant impediment to starting and continuing in education, as there is no guarantee as to whether or not the child can continue to secondary and tertiary levels without official transcription. Additionally, according to an education expert the 'guest student' scheme is not 'preferred' by families who are unconvinced that an education without validity of transcription would in fact improve their children's future prospects.<sup>278</sup>

The FGD conducted with Afghan girls in Ankara confirms that lack of registration is a major impediment against formal education. An Afghan young girl stated that, *'I would love to go to school but I can't without kimlik (ID), no girls without kimlik go to school around me.'*<sup>279</sup> Instead the girls are aware of literacy and language courses, which some attend and which they consider valuable to their development. In the lack of access to public schools, the girls pointed to Qur'an courses and 'open school'<sup>280</sup> as alternative education options for them. However, the latter still requires valid TP or IP Identification.

Once registered, refugee children further face problems at school that increase their risk of dropping out. This is particularly the case for children who are admitted to school without preparation courses or admitted in one of the middle grades. Limited proficiency in Turkish, which brings about difficulties in learning and in mixing effectively with peers and the risk of isolation are major issues cited by service providers, children and their parents.

It appears bullying in schools particularly among boys is not uncommon between children from refugee and host communities and does at times extend to in between the refugee children themselves. In that, an education expert underlined that bullying of host community children towards their refugee peers is the case. Furthermore, refugee children of ethnic Turkish origin (i.e. Turkmans) – due to a cultural and linguistic proximity – were noted to depict exclusionary behaviour towards ethnically diverse refugee children (Syrian

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<sup>276</sup>UNHCR & UNICEF, Turkey Education Dashboard Quarter 1, 2019, accessed via <https://data2.unhcr.org/en/documents/download/70018>

<sup>277</sup>PRGA KII Service Provider, Keçiören, Ankara (13/05/2019)

<sup>278</sup>Ibid.

<sup>279</sup>PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

<sup>280</sup>The open school modality entails following courses from home and provision of taking exam for valid school certification.

Arabs or Afghans).<sup>281</sup> The prominent issues children (boys) bring up at school are the inability to follow courses due to language barriers, peer bullying and problems with teachers (e.g. neglect, maltreatment).<sup>282</sup> A number of young boys in an FGD stated that not being successful at school demotivates them. An Iraqi boy mentioned:<sup>283</sup>

***‘I was at the top of my class when I was back home. Now I am at the bottom, I don’t like the courses and I don’t want to study.’***

A number of boys in the FGD also mentioned that they are looking forward to the end of the school term and being able to work to support their families during the summer.<sup>284</sup> The testimonies of the children above point to an imminent need to establish supportive mechanisms that focus on the children’s learning, their psychosocial wellbeing and protective peer relationships.

Additionally, parents and caregivers struggle to assist children in school with their learning (i.e. homework) due to their lack of Turkish skills and have limited communication with teachers and with fellow parents from the local community.<sup>285</sup> Given the limited social capabilities (i.e. language, social connections to teachers and host community children and caregivers) to support and monitor children’s education, insecurities tend to increase among some refugee caregivers. In that Syrian women in Altındağ mentioned they are concerned around the social environment of children engage in school and that the fact that they have limited information on developments concerning their children’s social circles etc. This poses risks on children’s continuation to education, and for adolescent girls in particular. In an FGD with Syrian women, the continuation to education of girls was a contentious topic. A mother noted that schools being mixed gender is a barrier for girls:

***‘It is very difficult for girls to continue after primary school when boys and girls are in mixed classrooms, it was not like that in Syria. Sometimes my husband tells me that our daughters are fine with primary school and we should pull them out. I convince him by saying the girls will have nothing to do in the house. I am worried, I need to fight for the girls every year.’***<sup>286</sup>

Most of the female participants consider that mixed-gender classes will continue to have a negative impact on the continuation rates of girls and that these would improve if the classrooms were single sex.<sup>287</sup>

## **AVCILAR & ÜMRANIYE, İSTANBUL**

In line with the decree issued by the İstanbul Provincial Directorate of National Education, from the 2018 – 19 academic year onwards, only refugee children with IDs issued in İstanbul can enrol in public schools. The strict application of the policy poses a major barrier against the access of unregistered refugee children and children with registration in a different province other than İstanbul to formal education. However, a number of public schools in Avcılar and Ümraniye are continuing to admit refugee children, irrespective of their

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<sup>281</sup>PRGA KII Service Provider, Keçiören, Ankara (13/05/2019)

<sup>282</sup>PRGA FGD mixed nationality boys (13-17 years old), Ankara (20/04/2019)

<sup>283</sup>Ibid.

<sup>284</sup>PRGA FGD mixed nationality boys (13-17 years old), Ankara (20/04/2019)

<sup>285</sup>PRGA FGD Syrian women, Ankara (16/05/2019)

<sup>286</sup>Ibid.

<sup>287</sup>Ibid.

registration status, to primary school as guest students, but the students' chances of proceeding to secondary school is unknown.

The transition from Temporary Education Centres, which are implementing the curriculum in Arabic, and with additional Turkish language courses, is being undertaken at a rapid pace. Both the children and local teachers struggle to adapt to learning and teaching in bi-national/lingual classes. An educator commented that teachers face challenges in communicating with children and supporting them without the necessary linguistic or technical skills.<sup>288</sup> Issues have also been noted in relation to the lack of support around on the part of the teachers in dealing with the complex developmental and psychosocial issues that Syrian children experience.<sup>289</sup>

The challenges highlighted in Avcılar and Ümraniye focus on adaptation, sustaining relations between refugee and host community students, capacitating educators and on engaging both Syrian and host community parents. Peer bullying was highlighted as a major issue in Avcılar. While Syrian parents pointed to bullying by Turkish students and lack of intervention by teachers in school.<sup>290</sup>

In both districts, a number of schools launched accelerated Turkish language and catch-up classes for Syrian children who encounter language barriers and 'learning difficulties' by separating refugee children's classrooms or allocating specific hours for accelerated courses during school hours. A separation based on skills-gaps or learning difficulties may cause further isolation of students while in school. Additionally, there is no standardised benchmark or testing to determine 'learning difficulties' designed for refugee children.

A number of educators in Avcılar noted that Syrian children engage in 'negative behaviours' such as sleeping during class, inability concentrate or 'violent or aggressive' behaviours (attributed more to boys) towards peers and teachers.<sup>291</sup> However there are often root causes to these negative behaviours such as being educated in a foreign language and being 'stuck' between two languages (in that they are using their native language at home and Turkish at school), lack of parental support, and a sense of isolation in the classroom.<sup>292</sup>

An educator in Ümraniye pointed to challenges seen with children who transitioned from TECs with limited Turkish skills and also children admitted in the middle grades, compared to those admitted in the first and second grade, observing that difficulties in adaptation, risk of isolation and physical aggression is more common among the former group. Additionally, the exclusionary behaviours of some Turkish students towards refugee students was raised as an escalating issue.<sup>293</sup> According to an educator, the lack of communication between Syrian and host caregivers and a change of public opinion for worse towards refugees trickle down to host community children and negatively affect peer relations among students.<sup>294</sup>

Service providers consider the ages of 11-12, or the period of transition from primary to secondary school to be critical in that the likelihood of dropping-out in this period increases.<sup>295</sup> Issues encountered at school,

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<sup>288</sup>PRGA KII Service Provider, Avcılar (22/05/2019)

<sup>289</sup>Ibid.

<sup>290</sup>PRGA FGD, Syrian women Yeşilkent, Avcılar (22/05/2019)

<sup>291</sup>PRGA KII Service Provider, Avcılar (22/05/2019)

<sup>292</sup>PRGA KII Service Provider, İstanbul (07/05/2019)

<sup>293</sup>PRGA KII Service Provider, Ümraniye (03/07/2019)

<sup>294</sup>Ibid.

<sup>295</sup>PRGA KII Service Provider (13/05/2019), KII Service Provider, Avcılar (22/05/2019)

financial limitations, and the unlikelihood of continuing education as guest students in the case of unregistered refugees, increases the drop-out rate of children in school. Accordingly, also children *in school* are identified as a major group at risk. Children who are currently in school, without sufficient structural support targeted at them, host and refugee caregivers and teachers, are at risk of dropping out and, consequently, facing isolation in the community and the possibility of child labour and child marriage.

What is also worth mentioning is the limited availability of programmes for refugee children to formally learn their native language (e.g. Arabic reading and writing skills) and the fact that a part of the Syrian children who were born and raised in Turkey now is more fluent in Turkish than in Arabic. This gap appears to drive some caregivers to opt for informal Arabic learning courses – i.e. Arabic and Qur’an teaching courses in a Syrian community-based organisation in Avcılar,<sup>296</sup> – and an increase in sending children to Qur’an courses during summer in Ümraniye. A lack of opportunity to learn their native language, may also impact on the communication within households between children with limited Arabic skills and their parents.

### 5.2.2 CHILDREN ENGAGED IN CHILD LABOUR

Child labour is a prevalent issue for both host and refugee community children in Turkey. Considering that more than half of the refugees live below the poverty line, with their main source of income being unskilled irregular work, negative coping mechanisms with an effect on children are utilised among refugee households. In 2018, 15% refugee households withdrew children from school, 5% of households were reported to have sent children under 15 years old to work.<sup>297</sup>

### KEÇİÖREN & ALTINDAĞ, ANKARA

Altındağ, with its manufacturing and furniture sector in the Önder, Ostim, and Siteler neighbourhoods, and Keçiören with its proximity to Ulus and Dışkapı where daily jobs are available, offers entry points into the informal economy. Refugee children (mostly boys) along with their local peers are engaged in street work in Altındağ.<sup>298</sup>

The factors contributing to child labour in urban contexts are intertwined with a lack of livelihood and limited access and chances to continue education. In Ankara, Syrian women outlined the following as causes to child labour:<sup>299</sup>

- Insufficient income to sustain the household in the light of increasing rent and cost of living in urban areas.
- Lack of access to regular financial or in-kind assistance (particularly ESSN).
- Inability of adult men to find regular jobs due to the unwillingness of local employers to hire them, in addition to chronic illness and/or physical impairment.

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<sup>296</sup>PRGA KII Syrian Female Community Leader, Avcılar (06/05/2019)

<sup>297</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

<sup>298</sup>Ankara PDoFLSS (ex-Provincial Directorate for Family and Social Policy), ILO & Hacettepe University, Ankara Sokaklarında Çalıştırılan Çocuklar: Sorunlar ve İhtiyaçlar, ‘Children Made to Work on Ankara Streets: Problems and Needs’, December 2016, accessed via <https://ankara.ailevecalisma.gov.tr/data/591592e1290eac4d48ad23a7/ara%C5%9Ft%C4%B1rma%20raporu%20bask%C4%B1%20onay%C4%B1.pdf>

<sup>299</sup>PRGA FGD Syrian women, Altındağ (16/05/2019)

- Sense of ‘temporariness’ paving the way for not prioritizing children’s education.
- The tendency of market actors, in particular local employers, to see children as healthier and cheaper labour compared to adults (men).

An FGD with adolescent boys suggests that challenges experienced in school pave the way towards engaging in part time or seasonal work during the summer. Iraqi and Afghan boys in the group who had worked prior to being in school mentioned working as a positive experience. A 14-year-old Iraqi boy said:

***‘I used to work in a barber shop, made my own money. Now I go to school, but I do not feel good. If my parents allow me I may go back to work’.***

Boredom, lack of success in courses and an inability to follow lessons in Turkish were noted as main challenges by refugee boys. Three boys mentioned that they thought they would feel better working compared to being in school. A number of the boys mentioned small shops owned by relatives in Ulus and Dışkapı as places they occasionally work, considering their participation as not only supportive but also as a leisure activity, or something that they actively enjoy doing.<sup>300</sup>

Young Afghan girls stated that work is common for both boys and girls. Boys mostly work in small shops or in the manufacturing sector, while girls work in tailoring, and in agriculture in the fields outside of Ankara.<sup>301</sup> An unregistered Afghan girl who works in the textile sector said:

***‘I feel responsibility to support the family income and make my parents proud now that I cannot go to school here.’<sup>302</sup>***

Additionally, domestic work appears to be prevalent among girls, for some in addition to working to earn an income. Most Afghan girls noted that doing house work and taking care of siblings takes up much of their time during the day. A young girl mentioned how she feels obliged to take care of the house and the family even if it is very tiring.<sup>303</sup>

## AVCILAR & ÜMRANIYE, İSTANBUL

A 2016 survey conducted in İstanbul with Syrian refugees found half of refugee children who work were engaged in the textile business, one third in the service sector (kiosks, grocery shops, catering facilities, cafes and restaurants) and one fifth in industrial work ranging from furniture production to automobile factories.<sup>304</sup> The main reasons identified for working were the need for an income and the inability to afford costs associated with education (46,9%).<sup>305</sup>

<sup>300</sup>PRGA FGD mixed nationality boys (13-17 years old), Ankara (20/04/2019)

<sup>301</sup>PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

<sup>302</sup>PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

<sup>303</sup>Ibid.

<sup>304</sup>Support to Life, Vulnerability Assessment of Syrian Refugees in İstanbul, 2016 accessed via <https://data2.unhcr.org/en/documents/download/54518>

<sup>305</sup>Ibid.

Similarly, for this study, the Syrian participants often shared accounts on how the lack of access to the formal labour market for adults, poverty and the unaffordability of education are amongst the factors that drive one or more children into work in Avcılar and Ümraniye. A woman participant in Avcılar stated that:

**‘If you have more than one child, one or more is destined to work, sometimes as early as 10 years old. Children too know this fact.’<sup>306</sup>**

The sense of hopelessness around the future of children in education is seen in the comments by another woman: *‘We send children to school only for them to become ortacı (unskilled worker in the manufacturing sector.) They will eventually need to work.’<sup>307</sup>*

According to the Syrian participants in Ümraniye, boys are affected to a larger extent with the increasing burden upon them to contribute to the household income through working in textiles, in small shops and in factories.<sup>308</sup> The issues encountered in school and the social acceptance of the practice caregivers intrinsically enable child labour. According to a Syrian man in Ümraniye:<sup>309</sup>

**‘Children do not want to go to school. They cannot follow courses. They see us struggle (with costs of living). Getting their first payment makes them happy, but eventually they are extremely tired; however, they continue at the will of the families.’**

In reality, boys and girls who work in Avcılar and Ümraniye unanimously mentioned stress, tiredness and a lack of opportunities for self-development, however they feel the need to work to support the family.<sup>310</sup> In Avcılar, there are numerous small textile shops where children engage in uninsured work and under unsafe working conditions. Young girls are reported to work with their parents for long hours and are expected to work quickly and for a lower income.<sup>311</sup> In Ümraniye a 14-year old Syrian boy who used to work but has now stopped, mentioned that his friends are working 10 to 12 hours a day in small shops and in textile workshops for up to six days a week at times. He stated that:<sup>312</sup>

**‘I used to work in a shop, all day from 7 am to 7pm. In the evening, my brain used to ache. They asked me to run errands and run fast. I was paid but I know friends who were not. I was so tired my mother asked me to stop working.’**

Working conditions, lack of safety in and around the workplace, and the exploitation of employers via threats not to pay them causes children to be at risk of physical and economic violence. Often when they are not paid or paid less than promised, children cannot complain due to fear of their employer. A young Syrian girl mentioned that all they can do is change jobs, accept lower payment or opt to work in places where relatives and friends work.<sup>313</sup>

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<sup>306</sup>PRGA FGD Syrian women Yeşilkent, Avcılar (22/05/2019)

<sup>307</sup>Ibid.

<sup>308</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>309</sup>Ibid.

<sup>310</sup>PRGA FGD Syrian boys, Avcılar (21/05/2019), KII Syrian girl (15 years old), Avcılar (22/05/2019), KII Syrian boy (14 years old), Ümraniye (04/07/2019)

<sup>311</sup>Ibid.

<sup>312</sup>PRGA KII Syrian boy (14 years old), Ümraniye (04/07/2019)

<sup>313</sup>PRGA KII Syrian girl (15 years old), Avcılar (21/05/2019)

During consultations for this study, the practice of child labour was frequently raised by refugee adults and children as a ‘necessity’ and not a choice. On the other hand, service providers in all districts point to the social acceptance of child labour, the practice of families encouraging their children to work to contribute to the family income, and a lack of cooperation from caregivers in sustaining their children’s education and development as significant factors in the prevalence of child labour.

Whilst SSCs are the primary duty bearer to respond to child protection issues including child labour, a frontline worker in İstanbul stated that precautionary education measures (*tedbir kararı*) recommended by the SSCs are ineffective as follow-up remains limited. Instead, increased Social-Economic Support (SED) must be provided by SSCs, in addition to focusing on the practises of small enterprises by raising awareness and imposing legal sanctions on those which employ children.<sup>314</sup>

Complementary and holistic support to address the root causes of child labour of boys and girls is also critical for NGOs to invest in. The lack of a dedicated agency at the district-levels to address child labour issues affecting refugee children is currently a major gap. This, in conjunction with limited prevention and response measures targeting refugee children, caregivers and employers, compound the continuation of child labour. There are challenges in establishing interlinkages between education, skills-building and job placement mechanisms for (young) adults which, as a result, increases the likelihood of children working.<sup>315</sup>

Institutional deficiencies such as the absence of compulsory inspections in small enterprises (with less than 3 employees), a lack of supportive long-term interventions particularly for unregistered refugee children (e.g. income replacement, social assistance such as SED, supportive measures to access to education, long-term psychosocial support) and a persistent need to generate income at household level all contribute to the continuation of child labour in the districts. Child labour as a multi-faceted protection issue needs to be addressed in accordance with a systematic policy that engages the PDoFLSSs and the SSCs in cooperation with child protection actors and care givers to ensure that girls and boys, if taken out of work, have access to supportive mechanisms and are not forced into worse forms of labour.

### 5.2.3 CHILDREN AT-RISK OF, OR IN CHILD MARRIAGE

According to a recent WFP survey, 9% of refugee households in Turkey have married-off a child under 16 years old.<sup>316</sup> Despite the commitments by the Government of Turkey, the concealment of child marriages remains a major issue both among the host community and, to a further extent, among refugee communities due to fear of penalties and legal repercussions. During this study, very few refugee participants brought up child marriages as a forthcoming issue unless specifically asked about it, and (apart from one group of women in Ankara), the responses were brief and avoiding the subject.

Syrian women in an FGD in Ankara highlighted, more or less unanimously, that poverty, having ‘one less mouth to feed’, perceived ‘security’ and a sense of the ‘better’ future prospects that marriage brings to young girls are contributing factors to child marriage.<sup>317</sup> They further pointed to the fact that increased responsibilities

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<sup>314</sup>PRGA KII Service Provider, İstanbul (02/07/2019)

<sup>315</sup>PRGA KII Service Provider, Ankara (24/06/2019)

<sup>316</sup>WFP, Comprehensive Vulnerability Monitoring Exercise, May 2019, accessed via <https://reliefweb.int/report/turkey/refugees-turkey-comprehensive-vulnerability-monitoring-exercise-round-3-may-2019>

<sup>317</sup>PRGA FGD Syrian women, Altındağ, Ankara (16/05/2019)

that young boys face and that therefore force them to ‘grow up earlier’ also encourages them to marry at an early age.<sup>318</sup>

The sense of physical, social and economic insecurity appears to be a factor triggering child marriages. While frontline workers point to poverty and a lack of future prospects in education as determinants to child marriage,<sup>319</sup> a Syrian woman pointed to the reasons for caregivers marrying off daughters as being that they are unable to monitor adolescent girls’ social surroundings, especially if they are in school and spend time away from the home.<sup>320</sup> A Syrian woman underlined how male dominant decision-making in the households contributes to the continuation of child marriage as follows:<sup>321</sup>

**‘The family decides whether to marry off a child or not, mostly the men decide on the matter. I don’t think their (men’s) behaviour will change. I hear girls married off, often with religious marriage with no rights for the girl, before they are mature enough. They (men) pressure the girls, they convince them’.**

However, the personal experiences of some women who were married off as children point to the risks and first-hand experience on the detrimental harm of child marriages:

**‘Girls who marry at an early age have to grow faster socially. They take on responsibilities they should not be carrying. Their physical health is at risk. I married at the age of 14, and it was very difficult for me. No child should be married at such young age.’<sup>322</sup>**

Whilst the findings above indicate the continued need to raise awareness on the actual harm of child marriages, a frontline worker in İstanbul pointed to the differences among refugee communities in their attitudes and practices, and that assumptions made in this regard, coupled with information sessions on child marriage that have a focus on legal sanctions, risk alienating caregivers from different backgrounds. The assumption that child marriage is practised by all social sections across the refugee communities creates resentment amongst them.<sup>323</sup> On that note, whilst information dissemination raises a certain level of awareness on the legalities of the subject, it appears to have exclusively punitive connotations with the refugee communities. As a Syrian man in Ümraniye pointed out, the fear of penalties pushes child marriages underground while caregivers continue the practice for particularly young girls.<sup>324</sup>

The service providers across all districts highlight a pattern of withholding information by caregivers on children at risk of/in marriage. Child marriages are in the form of religious marriages and are therefore not legally recognised. The children born out of ‘unofficial marriage’ are often recorded under an adult’s name or remain unregistered. Most cases of child marriage are detected via anonymous reporting and, in rare cases, when pregnant girls experience significant health risks and have to go to public hospital, as a last resort.<sup>325</sup> Frontline workers in Avcılar and Ümraniye pointed to difficulties in reaching out to children directly and that

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<sup>318</sup>Ibid.

<sup>319</sup>PRGA KII Service Provider, Keçiören, Ankara (13/05/2019), KII Service Provider, Ankara (21/06/2019)

<sup>320</sup>PRGA FGD Syrian women, Altındağ, Ankara (16/05/2019)

<sup>321</sup>PRGA FGD Syrian women, Altındağ, Ankara (16/05/2019)

<sup>322</sup>Ibid.

<sup>323</sup>PRGA KII Service Provider, İstanbul (02/07/2019)

<sup>324</sup>PRGA Syrian Male Community Leader, Ümraniye (29/06/2019)

<sup>325</sup>PRGA KII Service Provider, Ankara (21/06/2019)

engaging with parents and caregivers instead of children acts a major barrier for them to work on preventing the marriages before they take place.<sup>326</sup>

In addition to identification issues, a frontline worker pointed to the challenges that exist in issuing child protection precautionary measures (*tedbir kararı*), as well as inconsistent practices in the response mechanisms:

**‘Child marriages are kept hidden, precautionary measures (*tedbir kararı*) are rarely issued for married children above 15 years old, and for the younger ones we have witnessed the child being taken into Child Support Centre and returned to her caregivers in a month.’**

According to a respondent, the limited technical capacity and lack of initiative on the part of state actors (e.g. SSC Boards, MoFLSS, judges) is a major barrier to addressing the wellbeing of married children after the identification of a child marriage. In most cases precautionary measures (*tedbir kararı*) are rarely issued, and there is a lack of legal experience in the prosecution of child marriages that took place in Syria and not in Turkey.<sup>327</sup>

Given the issues outlined above, it is evident that addressing child marriage requires efforts ranging from transforming gender and social norms as well as practices from within communities, to contributing to household incomes. Also required is collaboration with protection, legal and health actors in that regard. UNFPA has recently launched a pilot initiative to engage men and boys in community-based discussions on gender equality<sup>328</sup> in İstanbul and is in preparation for scaling up information sessions with a focus on the physical and psychological health risks associated with child marriage.<sup>329</sup> It is important that these plans are complemented at district level. The tools commonly utilised to combat child marriage, along with other child protection issues, namely precautionary measures, awareness raising and legal sanctions, need to further extend to long-term supportive interventions also ensuring better engagement around the issue by men and boys.

#### 5.2.4 OTHER PROTECTION RISKS REGARDING CHILDREN AND YOUTH

Across all fields, the issues of behavioural changes such as aggression, introversion or, conversely, seeking independence, by boys in particular, as well as addiction to social media and cell phones, were noted as risks affiliated with children. A Syrian woman in Avcılar noted that:<sup>330</sup>

**‘Children spend too long on the internet, or they are outside on the street and do not tell us. When I speak to my son, he gets very aggressive which is new to us. In Syria, I did not worry this much, they used to go to places we knew, here I don’t know where my son is at times.’**

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<sup>326</sup>PRGA KII Service Provider (03/05/2019), FGD Service Provider, Avcılar (06/05/2019), FGD Service Provider, Ümraniye (05/07/2019)

<sup>327</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>328</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>329</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>330</sup>PRGA FGD Syrian women, Central Avcılar (20/05/2019)

With regard to parental care and support, frontline workers point to tendencies among some caregivers to opt for full-day, free Qur'an courses in Ümraniye and Ankara as a way of dealing with children out of school.<sup>331</sup> When asked about the risks pertaining to children and youth, caregivers overwhelmingly referred to the lack of education and development opportunities, unsafe neighbourhoods, and bullying and discrimination in schools and on the street. Much less was spoken about regarding risks in the household in relation to communication with children and to challenges in parental support. However, a few Syrian caregivers mentioned that responsibilities around household chores along with taking care of the children causes them to yell at them or hit them at times, particularly if they don't go to school and spend all day at home.<sup>332</sup>

Syrian children aged 9 to 12 in Ümraniye identified football fields, streets, homes, houses of relatives and Qur'an courses as places where they spend time. While the overwhelming majority of boys referred to outside spaces girls mostly highlighted homes and Qur'an courses.<sup>333</sup> This is echoed by a frontline worker, in that girls are much less knowledgeable of their outside surroundings in the district.<sup>334</sup> In Ankara, NGO workers supporting Afghan children noted that, very young children (i.e. 5-6 years old) spend time on the streets and in the local market which families regard as unsafe due to the strangers approaching children and offering them small 'gifts' in return for daily work.<sup>335</sup>

In Ümraniye, the most common risks raised by children (9-12 years old) from different neighbourhoods were:<sup>336</sup>

- Arguments and physical fights with Syrian and Turkish children on the street,
- Discrimination and teasing for both boys and girls,
- Drunk adults in public spaces and in deserted buildings,
- Road accidents.

The limited information channels, 'protection' and 'safety' concerns with regard to adolescent girls have been highlighted in previous chapters. Syrian and Afghan girls who participated in this study noted that parental permission was paramount for them to access services, develop social connections and spend time with their peers. In general, girls are observed to be accompanied by caregivers, and family members when they spend time outside. A young Syrian girl stated that:<sup>337</sup>

**'Our parents don't trust strangers, they do not let us go out alone. We mostly go out together, or with relatives. There are empty streets and deserted houses and it scares them (parents).'**

Afghan girls referred to similar social barriers to their participation in the community, and that the caregivers are concerned about the 'honour' of the family if a girl spends too much time outside.<sup>338</sup> In that light, establishing trust with their caregivers was identified by the participating girls as key to facilitating their engagement in the community.

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<sup>331</sup>PRGA FGD Service Provider, Keçiören, Ankara (24/06/2019), FGD Service Provider, Ümraniye (05/07/2019)

<sup>332</sup>PRGA KII Syrian woman, Avcılar (02/05/2019), KII Syrian woman, Avcılar (03/05/2019)

<sup>333</sup>PRGA FGD Syrian children (9-12 years old), Ümraniye (04/07/2019)

<sup>334</sup>PRGA FGD Service Provider, Ümraniye (05/07/2019)

<sup>335</sup>PRGA FDG Service Provider, Ankara (24/06/2019)

<sup>336</sup>PRGA FGD Syrian children (9-12 years old), Ümraniye (04/07/2019)

<sup>337</sup>PRGA FGD Syrian girls (13-17 years old), Ümraniye (03/07/2019)

<sup>338</sup>PRGA FGD Afghan girls (13-17 years old), Ankara (17/05/2019)

Boys are generally observed to be more engaged outside in the community. Yet, during FGDs, boys highlighted issues on discrimination and arguments on the streets with fellow refugees and with the host community.<sup>339</sup>

Children engaged in child labour are at greater risk, given their surroundings, the hazardous work they do and the lack of opportunities to develop themselves. The prevalent risks of exploitation and gender-based violence appear to be outweighed by their needs and responsibility to contribute to the household income. For both boy and girls, finding jobs through trusted acquaintances, commuting to work together or working with relatives and parents were noted as coping strategies, which are significantly limited in adequately addressing the wellbeing of child labourers. Working young boys and girls are significantly disadvantaged in terms of time and resources to allocate to the development of skills. This is evident in their stated needs during the FGDs. Both girls and boys prioritised skills-building, namely Turkish and English language courses and sports activities in relation to their development and wellbeing.

### 5.3 WOMEN AND GIRLS

As outlined in Section 4 – Community Support Mechanisms and Resources, women and girls in the targeted districts cited social circles, relatives and neighbours as primary information sources and, to a lesser extent, municipalities, NGOs and social media. With high illiteracy rates, basic or no knowledge of the Turkish language (70% of women),<sup>340</sup> a significant portion of female refugees are susceptible to dependence on others due to a lack of direct access to information or simply to a lack of information about rights and services pertaining to their wellbeing.

Across all the districts, the lack of Turkish language skills and limited mobility were observed as a major barrier to women's access to information and services. Despite the availability of courses by Public Education Centres, and municipalities as well as some non-governmental organisations, impediments to access were identified as lack of information on the available courses, (lack of) registration status, home care responsibilities and lack of childcare services for dependents.<sup>341</sup> Syrian women in Ankara who pursued language courses mentioned distance and long waiting lists as major factors impeding their access to Public Education Centres courses.<sup>342</sup>

When their daily routine was enquired about, women overwhelmingly mentioned daily chores, home care responsibilities and taking care of dependents, which includes the elderly and family members with chronic illnesses, as well as children. Syrian woman in Avcılar noted that:

**'I feel tired all the time, carrying the load of the family, as if I am living the same day over and over again.'**<sup>343</sup>

The main priorities raised by female participants were linked to the welfare in the household (i.e. registration, social assistance) and to increased work opportunities, primarily for men but also for themselves. In addition, better access to education for children and support in accessing health services were mentioned. The vocabulary used by them to describe their own feelings, included such words as “despair”, “hopelessness” and

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<sup>339</sup>PRGA FGD mixed nationality young boys (13-17 years old), Ankara (20/04/2019)

<sup>340</sup> UNHCR, Gender Thematic Dashboard, February 2019, accessed via <https://data2.unhcr.org/en/documents/details/69560>

<sup>341</sup>PRGA FGD Syrian women, Altındağ (16/05/2019), FGD Syrian women, Yeşilkent (22/05/2019)

<sup>342</sup>PRGA FGD Syrian women, Yeşilkent (22/05/2019)

<sup>343</sup>PRGA FGD Syrian women, Avcılar Centre (20/05/2019)

“burden”, by the majority of the participants.<sup>344</sup> A mental health expert in Ankara also regards women as more susceptible to depression and isolation due to confinement in the home through social and gender norms but also limited chances to establish social connections in the wider community as a result of poverty.<sup>345</sup>

On that note, community-based initiatives, including the activities held in safe spaces in proximity to the women’s homes and activities designed in line with the needs and wishes of women to incorporate supportive measures (e.g. childcare for children, most importantly) are paramount. Syrian women frequenting similar activities exclusively for them in Avcılar and Ankara described speaking clubs and knitting workshops as a source of support through which they can feel a sense of relief and solidarity. NGO frontline workers in Ümraniye pointed to a decrease in the numbers of adults taking part in activities, including women, because more and more activities targeting adults turn into information sessions, with less focus on the psychosocial and skills-building needs of adults.<sup>346</sup>

Whilst social barriers were often raised as impediments against the participation of refugee women in the community, it should also be noted that women have also taken on an increasing responsibility and initiative in the care of their households in Ankara and İstanbul. As such, they have become more visible in the community. Some Syrian women referred to the change of roles in the family as a source of conflict with male figures and a cause for arguments in the households. A Syrian woman discussing the increasing role of women in the community noted that:

**‘We had, water, electricity, a normal life in Syria. Now we, including the women, need to run errands for everything. A part of the community still does not approve of how we are outside helping with the issues.’<sup>347</sup>**

Participants to this study stated that refugee women in metropolitan cities are increasingly seeking income-generation activities, noting that safety of jobs, proximity to home and availability of childcare facilities are important factors in women’s participation in the labour market.<sup>348</sup> A livelihood expert in Ankara outlined the considerations pertaining to women’s participation in income-generating activities below:<sup>349</sup>

**‘Women mostly ask for language and vocational courses a lot. Limited Turkish language skills is still a prevalent issue. Hair dressing, sewing, knitting, tailoring and skills they can utilise from home are more in demand. Given their home care responsibilities, most women are in need of courses and work that is close to home. There is an increase in women’s interest in working, however social and mental preparation is required for them to step into the labour market.’**

Syrian women who used to work in Syria previously also face impediments which were raised below during an FGD in Avcılar such as:

- language barriers;
- capped professions or lack of jobs for skilled women (e.g. teachers, lawyers);

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<sup>344</sup>PRGA FGD Syrian women, Altındağ (16/05/2019), FGD Syrian women, Avcılar Centre (20/05/2019)

<sup>345</sup>PRGA KII Service Provider, Altındağ, Ankara (15/05/2019)

<sup>346</sup>PRGA KII Service Provider, İstanbul (02/07/2019), FGD Service Provider, Ümraniye (05/07/2019)

<sup>347</sup>PRGA FGD Syrian women, Altındağ (16/05/2019)

<sup>348</sup>PRGA KII Service Provider, Ankara (18/04/2019), FGD Syrian women Central Avcılar (20/05/2019)

<sup>349</sup>PRGA KII Service Provider, Keçiören, Ankara (18/04/2019)

- long full-time working hours that are in conflict with the home care responsibilities of most women, particularly those with dependents.<sup>350</sup>

Formal work opportunities are even more scarce for non- Syrian women (e.g. Afghan women). The large number of skills-building programmes which target Syrians under TP, the higher cost of work permits for IP holders and applicants, and requirements for renewal of IP Applicant IDs every six months render non-Syrian women less competitive compared to their host community and Syrian counterparts in the labour market.<sup>351</sup>

### 5.3.1 Women and Girls At-Risk of, or Exposed to Violence

The challenges outlined above render the access of women and girls to protection mechanisms essential in the urban settings such as Ankara and İstanbul, where the risk of domestic violence is aggravated by high levels of poverty and limited resources. Furthermore, exploitative conditions in the informal market pave the way for an increased probability of sexual and gender-based violence.<sup>352</sup> Efforts have been put in place by NGOs for the protection of women and girls' in all targeted districts. NGOs engage social workers, provide psychosocial support and undertake case management for those at risk and survivors of violence including coordination and referrals with the Social Service Centres. On the other hand, certain child protection concerns are problematic to tackle, such as child marriage, as a result of its complexity, lack of mandate among NGOs to conduct child protection case management and over stretched SSCs.

Community-based efforts, working with women and girls in their own settings allow longer term engagement are helpful in understanding the perception of gender norms and of violence. A service provider conducting community-based activities with women noted:

**‘During discussions in the houses, we meet refugee women with different perceptions of violence. A woman does not necessarily identify violence as directly against her. It takes time and listening to the experiences of women to relate to their situation. We inform women on their rights and mechanisms available, however we first try to understand women’s coping strategies by building rapport and listening.’**

When it comes to institutional support, women’s protection mechanisms are in place in Turkey and in principle are accessible to refugee women (see more on Section 2.1.3 Women’s Protection Mechanisms). However, consultations for this study indicate persistent disparities between the availability and accessibility of protection mechanisms in place. The challenges highlighted in Ankara and İstanbul are as below:

- Identification of violence against women is hampered by the lack of information on available mechanisms (73% of women do not know where to find or seek assistance related to violence or harassment)<sup>353</sup> and limited disclosure due to language, cultural and social barriers.
- The most common tools utilized by the SSCs with respect to women’s and girls’ protection in case of violence are of a judicial nature as protective measures (*koruma kararı*) which are perceived to be

<sup>350</sup>PRGA FGD Syrian women, Central Avcılar (20/05/2019)

<sup>351</sup>PRGA KII Afghan Woman, (22/04/2019), KII Afghan Female Community Leader (10/05/2019)

<sup>352</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>353</sup>UN Women & ASAM, Needs Assessment of Syrian Women and Girls Under Temporary Protection Status in Turkey, 2018, accessed via <https://www2.unwomen.org/-/media/field%20office%20eca/attachments/publications/country/turkey/the%20needs%20assessmentengwebcompressed.pdf?la=en&vs=3139&la=en&vs=3139>

inconsistent in their effectiveness.<sup>354</sup> There are occasions where precautionary measures either are not adhered by the perpetrator or not enforced by security forces.<sup>355</sup>

- Women in need of access to shelters have to go through complex, emotionally exhausting administrative procedures. They need to acquire a battery report in hospitals, make an official complaint to a police station and go through legal procedures in the Bar Associations and in Courthouses which lack translation and interpretation services. NGOs assist women and girls by providing interpretation services but more importantly by supporting them to navigate their way through the aforementioned complex administrative processes.
- Treatment in police stations ranges from supportive to obstructive. Some frontline workers indicate that said obstruction stems from a lack of knowledge on the relevant procedures pertaining to refugee women or to a lack of capacity, and also discriminatory behaviours.<sup>356</sup>
- The lack of registration is a major impediment against the effective use of women's protection mechanisms with particular regard to access to shelters. Unregistered refugee women and women with registration in a different province need to go through a separate verification process as per the directive of MoFLSS in order to be admitted to shelters.
- This leads to NGOs to opt for independent shelters in İstanbul in order to provide immediate support, but the independent shelters also have limited physical capacity, and some are not equipped (e.g. a lack of physical security systems, guards, 24-hour staff) to ensure physical safety of women at high risk thereby cannot fully meet the need in order to provide immediate support.<sup>357</sup>
- Consultations indicate that even for registered refugees, advocacy with the Violence Prevention and Monitoring Centres (ŞÖNİMs) is required to ensure their access to state shelters. Physical capacity issues, and inconsistent practices in admissions to shelters (e.g. requests for various documents, delays in obtaining interpreters) were the most commonly raised reasons for requiring advocacy with ŞÖNİMs.<sup>358</sup>
- Language barriers, lack of interpretation services and limited women's empowerment activities, coupled with the fact that boys over 13 years old (i.e. the women's sons, for example) are not allowed to stay in the shelters, means that the women tend to stay there for only a short period of time.<sup>359</sup>

## 5.4 MEN AND BOYS

The needs assessments of service providers may omit adult men who are considered, to a certain extent, capable of coping with challenges or being less at risk. On the other hand, outreach efforts aimed at men, when they are in place, are primarily hindered by limited access to them because the men are often at work or busy in search of work. Men also suffer from multiple vulnerabilities such as issues with registration, providing for themselves/for the household mainly through working in the informal market and under exploitative conditions, as well as limited targeted services for their psychosocial wellbeing and/or protection needs.

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<sup>354</sup>PRGA KII Service Provider, İstanbul (05/07/2019)

<sup>355</sup>Ibid.

<sup>356</sup>PRGA KII Service Provider, İstanbul (15/05/2019), KII Service Provider, İstanbul (28/05/2019)

<sup>357</sup>PRGA KII Service Provider, İstanbul (20/05/2019), KII Service Provider, İstanbul (28/05/2019)

<sup>358</sup>PRGA KII Service Provider, İstanbul (15/05/2019), KII Service Provider, Ankara (21/06/2019)

<sup>359</sup>PRGA KII Service Provider, İstanbul (28/05/2019), KII Service Provider, Ankara (21/06/2019)

Psychosocial support interventions despite targeting all genders, and activities mainstreaming gender equality, remain largely restricted to women and girls, whilst men and boys remain beyond the reach of such support mechanisms.<sup>360</sup> Furthermore, with respect to approaching protection assistance men and boys may require specialised support and a tailored approach and may refrain from seeking protection assistance due to social and cultural barriers (i.e. men and boys at risk/survivors of SGBV, in need of psychosocial support).<sup>361</sup>

Participants in this study listed the change of roles in the household, i.e. the increasing share of responsibilities between men and women, and the decreasing ability of men to fulfil their traditional caretaker roles as breadwinners, as contributing factors towards the likelihood of stress in the household and of domestic violence.<sup>362</sup> Syrian women pointed out that both in Avcılar and Altındağ men confined to the home become depressed, and are more prone to arguments.<sup>363</sup> The women also noted an increase in family disputes and in some cases divorce in Syrian households.<sup>364</sup>

Given the low rate of formal employment, men are exposed to challenges in the informal market including unfair working conditions which are biased against the refugee workers in favour of Turkish employees, decreasing wages, irregular payments and maltreatment by some employers. Syrian men pointed to an increase in discrimination and pressure at the workplace.<sup>365</sup> These issues were seen to intensify after the economic downturn in Turkey and were exacerbated by the rise in the nationalistic discourse during and after the local election process. A Syrian man in Ümraniye said:<sup>366</sup>

**‘We try not to argue with the Turkish workers or employers. The problems got worse this year. They say we live from their taxes. I am working, what else can I do? More and more, they blame everything on Syrians. If only they would listen to us.’**

An NGO worker underlined the continued need and their efforts to inform refugees in the labour market on the existence of anonymous reporting mechanisms to Social Security Institutions in case of work place exploitation.<sup>367</sup> However, Syrian men have stated that they cannot complain because of accumulated debts, and the fear that they will lose their job if they do so. In addition, the fact that some of the men are unregistered, or experience difficulties around their registration status means they are further deterred from making formal complaints.<sup>368</sup>

Developing the language and vocational skills essential to increase chances of employment are unattainable for some men. Syrian men who attempted to register in skills-building courses in Public Education Centres in Ankara pointed to the insufficient number of courses opened, unclear admission criteria and a lack of guidance in application procedures as major challenges.<sup>369</sup> Furthermore, the skills-building programmes targeting registered Syrians negatively affect the accessibility of these programmes by non-Syrian men including Iraqis, Afghans even if they are registered. Single-male-headed households, similar to female-headed households are

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<sup>360</sup>PRGA KII Service Provider, İstanbul (24/05/2019)

<sup>361</sup>PRGA KII Service Provider, Ankara (21/06/2019)

<sup>362</sup>PRGA KII Service Provider, İstanbul (07/05/2019), KII Service Provider, İstanbul (28/05/2019)

<sup>363</sup>PRGA FGD Syrian women, Altındağ (16/05/2019), FGD Syrian women Avcılar Centre (21/05/2019)

<sup>364</sup>PRGA FGD Syrian women, Altındağ (16/05/2019)

<sup>365</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>366</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>367</sup>PRGA KII Service Provider, İstanbul (25/05/2019)

<sup>368</sup>PRGA FGD Syrian men, Ümraniye (29/06/2019)

<sup>369</sup>PRGA Syrian adults mixed gender, Altındağ, Ankara (13/05/2019)

further disadvantaged by the need to take care of dependents and the lack of childcare services, and as such are less likely to make use of skills-building courses.

### Single Men

Single men in the targeted districts face additional challenges. Family and community support are even more limited for single or unaccompanied men, who often share accommodation in sub-par conditions, while also at risk of eviction. There may, in addition, be a risk of sexual or gender-based violence in shared accommodations.<sup>370</sup> For single men, communication channels appear to be restricted to peers and online sources.<sup>371</sup> As they are outside of the existing eligibility criteria for social assistance, borrowing money and, accepting precarious jobs were listed as the survival strategies employed by them.<sup>372</sup> Single unregistered men are more susceptible to the risk of deportation,<sup>373</sup> which may lead to their abstention from seeking information and assistance outside of their trusted acquaintances, and they are consequently deprived of essential information with regard to their rights.

## 5.5 REFUGEES WITH HEALTH ISSUES

During the course of this study, access to health services and the prevalent health risks encountered by the refugee communities were among the most frequently raised issues. In the light of differing rights and access pathways as defined by registration status and varying service delivery capacities at province-levels, the following sub-section examines the situation of refugees with health issues in the targeted districts.

### KEÇİÖREN & ALTINDAĞ, ANKARA

#### Refugees under Temporary Protection

The stretched physical capacities of public hospitals, followed by an inability to access Arabic speaking interpreters were major problems identified by the SuTP seeking healthcare services. While the number of Arabic speaking interpreters assigned per state hospital is reported to have increased in Ankara in recent months,<sup>374</sup> Syrian participants still mentioned difficulties in getting interpretation support.<sup>375</sup> Due to the fact that demand is surpassing the supply of interpreters in health facilities, Syrian participants noted that they were in need of accompaniment through non-governmental organisations, and help from Turkish speakers (friends, neighbours) in getting appointments and during hospital visits. Without this help and support, they have to pay for interpretation services at the cost of 50 to 100 TL per hospital visit.<sup>376</sup>

The challenges above appear to discourage some Syrians (i.e. the elderly, persons with disabilities, persons with limited Turkish skills) from seeking healthcare services. A Syrian woman with a disability mentioned not seeking the healthcare she needs due to complex procedures in hospitals and affiliated costs and resources,

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<sup>370</sup>FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>371</sup>PRGA KII Syrian man, Ankara (18/04/2019)

<sup>372</sup>Ibid.

<sup>373</sup>PRGA KII Service Provider, İstanbul (25/05/2019)

<sup>374</sup>PRGA KII Service Provider, Altındağ, Ankara (25/06/2019)

<sup>375</sup>PRGA FGD Syrian mixed gender adults, Altındağ, Ankara (13/05/2019)

<sup>376</sup>Ibid.

such as time, interpretation expenses and the fee for issuing disability reports.<sup>377</sup> The testimonies of service providers reiterate the above issues raised, indicating that accompaniment and follow up are required to mobilise the elderly, single women in financial distress and those who do not speak Turkish in particular to seek health support.<sup>378</sup>

In principle, all registered refugees can access primary health care in family health centres located in neighbourhoods. However, a health service provider noted arbitrary rejections by health professionals at family health units, instead directing refugees to Migrant Health Centres, in addition to prioritising the host community over refugees in the provision of immunisation.<sup>379</sup>

There are reported challenges in issuing disability health reports for refugees. These are inconsistencies with respect to the disability rate determined by public hospitals (i.e. lower rate determination) and the objection process being complex. For example, a second assessment must be undertaken in a limited time frame (30 days upon the issuing of first report) and requires official petition to Provincial Directorate of Health and covering additional costs. A Syrian man in Ankara mentioned:

**‘In the beginning, doctors used to determine higher rates of disability, now they know we get assistance with a disability report they have decreased the disability rate. As a result, we cannot receive social assistance. Objection to the report is another issue. You need a renewed assessment by a different hospital. It costs us time, effort and money if we are to object.’<sup>380</sup>**

A lack of disability health report impedes the access of registered refugees (primarily composed of Syrians) to social assistance such as ESN<sup>381</sup> and other assistance that may be provided by the SSCs, SASFs and the municipalities.

### Refugees under International Protection

Refugees under IP status have a right to healthcare in their province of registration. Yet they face a number of barriers in making use of the services. Due to the lack of interpretation services other than in Arabic in hospitals, non-Syrian refugees (under IP) are required to provide interpretation via their own means. In some cases, Afghans were seen to support each other in provision of interpretation in hospitals (e.g. Afghan children accompany their families, and neighbours to the hospital).<sup>382</sup> Young Afghan boys stated in an FGD that they support their families by running errands or helping with interpretation, for long hours if need be.<sup>383</sup> A participant mentioned *‘I would prefer to be out playing with my friends, instead I spent all summer translating in the hospital for relatives’*. Responsibilities such as these force children to take on additional burdens and expose them to information they would not need to know otherwise, and that may be inappropriate for them.

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<sup>377</sup>PRGA FGD Syrian women, Altındağ, Ankara (16/05/2019)

<sup>378</sup>PRGA KII Service Provider, Keçiören, Ankara (10/05/2019)

<sup>379</sup>PRGA KII Service Provider, Keçiören, Ankara (10/05/2019)

<sup>380</sup>PRGA FGD Syrian mixed gender adults, Altındağ, Ankara (13/05/2019)

<sup>381</sup>According to ESN criteria, a household which includes a member with disability of 40% is eligible for cash assistance. Fully dependent household members (50% or more disability evidenced by a health board report) are granted additional monthly severe disability allowance.

<sup>382</sup>PRGA KII Afghan Female Community Leader, Ankara (10/05/2019)

<sup>383</sup>PRGA FGD mixed nationality young boys (13-17 years old), Ankara (20/04/2019)

The general health insurance policies of refugees under IP were deactivated en masse in late 2018 in Ankara. Humanitarian agencies initially were not informed on the reasons for the policy change and were made aware of it by IP holder refugees. According to a frontline worker in Ankara, some representatives from the Ankara PDMM were also unaware of the cancellation,<sup>384</sup> which may indicate a lack of coordination with respect to communication of policy changes within PDMM units and amongst other public institutions. In 2019, general health insurance policies have begun to be reactivated on an individual basis provided that an official health report is presented to the PDMM. In this picture, refugees with serious illnesses, those with disabilities and mobility issues such as the elderly remain at risk unless they can afford the cost of health reports or are able to travel to hospitals and to the PDMM to activate their insurance.

### Unregistered Refugees

Unregistered Syrian and non-Syrian refugees are only entitled to receive emergency healthcare in public hospitals. Their further use of the healthcare system requires them to pay fees. In principle, all refugees may access primary health care services in Migrant Health Centres (MHC) on the condition that any form of identification document is presented. MHCs appear to admit refugees without any form of ID as stateless people.<sup>385</sup> However, the consultations indicate the practice is not standardised across the board, and, coupled with the lack of interpretation services in MHCs, non-Syrian refugees, particularly the unregistered, face barriers to accessing healthcare services, including in the MHCs.<sup>386</sup>

The health needs of refugees include chronic illnesses, and/or serious conditions that require diagnosis and treatment further than what is provided at primary healthcare level. This is particularly problematic for unregistered refugees, who due to a lack of access to the public health system often neglect their health. Meanwhile, those who can afford it, pay for services, often getting in to debt with the hospitals. An overwhelming majority do not seek treatment, and instead acquire medication from relatives or seek aid and medicine from NGOs and local organisations.<sup>387</sup>

In a lack of access to public health services, the use of unlicensed clinics is another coping mechanism that unregistered refugees employ. According to a health service provider consulted, a number of unregistered Syrian women sought treatment in the emergency units of public hospitals. Following this the health service provider later discovered that, prior to their presentation at a public hospital, these women had been treated for women's health issues at the same unlicensed clinic.<sup>388</sup> Accounts of raids on unlicensed clinics appear in news sites, however the locations of such places are often hidden and not shared openly by the refugee community.

## **AVCILAR & ÜMRANIYE, İSTANBUL**

In İstanbul, registration problems Syrians encounter constitute the main barrier to access health services. Multiple testimonies by refugees point to negative coping strategies employed as a result of these barriers as follows:

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<sup>384</sup>PRGA KII Service Provider, Keçiören, Ankara (22/04/2019)

<sup>385</sup>PRGA KII Service Provider, Altındağ, Ankara (25/06/2019)

<sup>386</sup>PRGA KII Service Provider, Keçiören Ankara (10/05/2019)

<sup>387</sup>PRGA KII Afghan Community Leader, Ankara (10/05/2019)

<sup>388</sup>PRGA KII Service Provider, Keçiören, Ankara (10/05/2019)



- self-medication,
- not seeking treatment,
- resorting to unlicensed clinics,
- getting in to debt or spending savings for private medical treatment,
- procuring (when available) medication from acquaintances,
- discontinuation of or irregular treatment for chronic illnesses.

A Syrian woman described numerous efforts to get treatment for her chronically ill husband (unregistered) who needs regular medication, including numerous appeals to PDMM to register in İstanbul and seeking support from non-governmental organisations, with no positive outcome.<sup>389</sup> An elderly unregistered Syrian woman from Avcılar said that she sought treatment in an unlicensed clinic:

**‘Without *kimlik* I went to a Syrian doctor, I only go when I can afford it. Then I collapsed and had a nervous breakdown, but Samatya Hospital did not admit me because I don’t have registration in İstanbul.’<sup>390</sup>**

The anecdotes above are indicative of the risk of profound stress and the deteriorating physical and mental wellbeing as experienced among refugees.

Additionally, social barriers appear to be emerging with respect to use of the health system. An observed need for social and emotional support is evident in the testimonies of NGO frontline workers, as they point to an increase in requests for accompaniment to state service providers, and to public hospitals in particular:

**‘The hospital system is alien to refugees, particularly to those who don’t leave the neighbourhood and who don’t speak Turkish. There are people who encountered difficulties and maltreatment before in hospitals, they want a Turkish person to join them, so they don’t have to go through the same process alone.’<sup>391</sup>**

FGDs with young girls (13-17 years old) and with Syrian women revealed a lack of awareness among some Syrians of the interpretation services in public hospitals, which may relate to the stretched capacity often brought up with regard to health facilities in İstanbul. In addition, this could point to a limited access to information among women and girls.<sup>392</sup>

As in Ankara and Avcılar, the issue of unlicensed clinics was also raised in Ümraniye. A service provider mentioned that Syrians approached a pharmacy in Ümraniye with unofficial prescriptions obtained from the clinics, though the trend has diminished in the past months.<sup>393</sup>

Lastly, with respect to the prevalence of unlicensed clinics in all targeted districts, the risks affiliated with adolescent pregnancies must be noted. As explained under Section 5.2.3 Children at risk of or in Child Marriage, adolescent pregnant girls appear to make use of public health services as a last resort due to a fear

<sup>389</sup>PRGA KII Syrian woman, Avcılar (30/04/2019)

<sup>390</sup>PRGA KII Syrian woman, Avcılar (03/05/2019)

<sup>391</sup>PRGA FGD Service Provider, Avcılar (06/05/2019)

<sup>392</sup>PRGA FGD Syrian Women, FGD Syrian girls (13-17 years old), Ümraniye (03/07/2019)

<sup>393</sup>PRGA KII Service Provider, Ümraniye (05/07/2019)

of legal repercussions. In that light, it should be considered that at least some of the unidentified adolescent pregnant girls may be forced to resort to unlicensed clinics.

## 5.6 LGBTI REFUGEES

Turkey has, historically, been a transit country for LGBTI refugees in particular from Iran and Iraq. It could be argued that registration for Temporary Protection (for Syrian refugees) undertaken in numerous provinces in Turkey highlights the need to safely identify and support LGBTI refugees across the country. The registration process conducted by the PDMMs does not screen sexual orientation and gender identity. In addition, Article 67 of the LFIP which defines people of concern with special needs, does not explicitly mention LGBTI refugees.<sup>394</sup> In most cases many LGBTI refugees prefer to conceal their gender identities for self-protection during the registration interview process with state authorities.<sup>395</sup>

Leading safe lives is a major concern for LGBTI refugees. Large provinces, particularly İstanbul facilitates less visibility and more support networks, and as such has a high LGBTI refugee population.<sup>396</sup> For non-Syrian refugees that may be provided status under International Protection, NGO frontline workers make an effort to identify satellite cities for registration, prioritising provinces with established community support networks and presence of NGOs.<sup>397</sup>

Non-systematic discrimination and prejudiced practices were reported against LGBTI refugees in relation to access to services including health, employment and social services. According to a source, refugees seeking HIV, Hepatitis C and HPV testing and treatment may face discriminatory practices in some health facilities.<sup>398</sup> LGBTI refugees face further risks at work where some are forced to hide their gender identity due to a fear of losing their jobs. Moreover, sexual and gender-based violence may be prevalent due to their gender identity.<sup>399</sup> Transgender refugees are particularly disadvantaged in their access to work, housing and social services provided by state actors.<sup>400</sup> With limited employment opportunities, the LGBTI community relies on community support established among networks and on a number of specialised agencies. On that note, UNHCR's launch of an unconditional monthly cash assistance in 2019 to transgender and intersex refugees who have ongoing resettlement applications provides vital support.<sup>401</sup> The extension of this support to lesbians and gays was noted as a recommendation by a service provider interviewed for this study.<sup>402</sup> Safe identification and support for LGBTI children still remains an issue<sup>403</sup> in that they suffer from multiple vulnerabilities, including limited specialised service providers who have the relevant experience and training to work with LGBTI children.

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<sup>394</sup> Hayriye Kaya & Damla Çalık, KAOS GL Waiting to Be Safe and Sound; Turkey as LGBTI Refugees' Way Station, July 2019, accessed via [http://www.asylumineurope.org/sites/default/files/resources/lgbti\\_refugees\\_-\\_english\\_-\\_multeci\\_raporu2016.pdf](http://www.asylumineurope.org/sites/default/files/resources/lgbti_refugees_-_english_-_multeci_raporu2016.pdf)

<sup>395</sup> FRIT Technical Assistance to the EU Facility for Refugees in Turkey, Final Report, October 2018, accessed via [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated\\_needs\\_assessment.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/updated_needs_assessment.pdf)

<sup>396</sup> PRGA KII Service Provider, Ankara (21/06/2019)

<sup>397</sup> PRGA KII Service Provider, Ankara (14/05/2019), PRGA KII Service Provider, İstanbul (24/05/2019)

<sup>398</sup> PRGA KII Service Provider, Ankara (14/05/2019)

<sup>399</sup> Ibid.

<sup>400</sup> PRGA KII Service Provider, Ankara (21/06/2019), KII Service Provider, İstanbul (24/05/2019)

<sup>401</sup> PRGA KII Service Provider, Ankara (14/05/2019)

<sup>402</sup> PRGA KII Service Provider, İstanbul (24/05/2019)

<sup>403</sup> Ibid.

In relation to access to protection services and social assistance, the lack of gender-sensitised criteria in practice excludes some LGBTI refugees from assistance from Social Service Centres, as well as from the ESSN. Their access to social services is further hindered by social and cultural barriers, limited sensitisation of public service providers and a lack of adequate services to ensure protection of these groups. As such, increasing responsibility lies with non-governmental actors to safely identify and support the LGBTI refugees. However, sensitisation and increased capacity around working with LGBTI individuals, awareness on specialised services and confidential referral pathways are required for the NGO frontline workers.<sup>404</sup>

Consultations for this study point to an increase in collaboration and referrals between humanitarian organisations and specialised agencies which assist LGBTI refugees. In that, a number of trainings were undertaken for safe identification and referrals in İstanbul and Ankara, and mutual referrals are ongoing among NGOs.<sup>405</sup> However, whilst the Social Service Law (Law No2828) guarantees services be provided on a non-discriminatory basis, due to sub-optimal social and technical service capacities at province-levels, the protection of LGBTI refugees is left to LGBTI refugees themselves, along with activists, human rights organisations and NGOs. It is evident that developing diversity awareness and targeted inclusive interventions for LGBTI refugees by state service providers remains a mid to long-term goal.

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<sup>404</sup>PRGA KII Service Provider, Ankara (14/05/ 2019)

<sup>405</sup>Ibid.

# CONCLUSIONS AND RECOMMENDATIONS

## CONCLUSIONS

In response to the overall research question, the findings of the PRGA underpin a need to develop **complementary service provision** to that of public and non-governmental actors to ensure the protection of Syrian and non-Syrian refugee girls, boys, women and men in Keçiören, Altındağ, Avcılar and Ümraniye. Such support should be **holistic and integrated**, and for **SCI also be child and adolescent centred in its nature**.

At present, refugee communities with different vulnerabilities as well as capacities are residing in the targeted districts. The diversity of nationalities, registration statuses, varying rights and service access pathways bring about diverse coping strategies among the refugees. On the other hand, common traits such as high levels of poverty, limited integration to the community and formal market, and changing policies and practices with respect to rights and assistance hinders refugees' capabilities to achieve self-reliance in Ankara and İstanbul. Moreover, an escalating sense of insecurity and uncertainty amongst both Syrian and non-Syrian refugees, particularly following the downturn in the Turkish economy and the political and policy related developments that took place in post-local elections in 2019, **necessitate strengthened coordination with stakeholders which serve to the effect of protection of refugees**.

In wider context of this change in the socio-political landscape and often raised pressure on the service delivery capacities of public actors, **distinct opportunities for collaboration emerge in the districts between public agencies, NGOs and refugees themselves, that can be modelled for future provincial protection mechanisms**. Both SCI and other stakeholders need to put primary efforts to increased access of refugees to information, rights and responsibilities in a safe and supportive manner – and find ways to reach the most at-risk with necessary information and support, such as unregistered refugees and/or home-bound girls and women. **The capacities of refugees in these districts should be built on** through community-led initiatives, especially with regard to their contribution to community relations in the light of deteriorating opinion vis- a-vis refugees. This includes further investment on and use of capacities of adolescent boys and girls, young women and men from both refugee and host communities.

**Province level evidence-based advocacy through dedicated assessments on prevalent protection risks** and conveying Syrian and non-Syrian refugees' needs and priorities are paramount, so that the services are designed in line with needs, thereby strengthen the local protection response mechanisms in order to achieve long-term (durable) solutions.

It is paramount to engage in regular communication and to seek collaborative interventions with all stakeholders including public agencies (in particular PDoFLSSs and SSCs), other NGOs, Community Based Organisations and networks and refugee and host communities themselves at the district-levels. Additionally, provision of specialised support to non-Syrians and Syrians with registration problems is essential in order to help close gaps that are not addressed by the existing services at district-levels. For SCI, such support should be **focused on achieving enhanced protection, wellbeing and development for girls and boys below 18. Targeting of caregivers as part of a holistic response to children's needs and rights is essential, with particular focus on young caregivers**. Policy making efforts should be further carried out with national actors and UN agencies to continue to mainstream Syrian and non-Syrian refugees into public services and to

continue an expansion of service delivery capacities – in particular child protection mechanisms and their operationalisation at district-levels.

## KEY FINDINGS AND RECOMMENDATIONS

This section summarises key findings and puts forward relevant recommendations as per the sub-research questions addressed in the study. The following table is in line with the overall reporting outline of this report. A separate sub-section was added to underpin the issues and risks refugees face in the light of changing policies and practices with respect to registration and their ramifications in Ankara and İstanbul.

**1-Protection Risks with respect to Registration Status:** Registration under TP or IP as well as under residence permits allows protection by law and access to services (with different rights per registration status) in Turkey. Persisting challenges in registration as well as a misuse or lack of understanding with respect to the entitlements provided by residence permits among the refugee communities were reported in both Ankara and İstanbul. The halt in registration under Temporary Protection for Syrians, difficulties in renewal of Temporary Protection ID in İstanbul, as well as an increase in the number of unregistered refugees and refugees with humanitarian residence permits constitute a major barrier for refugees against protection by law and accessing basic services.

**2-The Protection Context and Services in the Targeted Districts:** In response to the research questions with a focus on service provision, district-based polices, programmes, gaps and barriers (questions 6-9, 10-11), the findings call for increased coordination and collaboration with district-based state actors and stakeholders to achieve mainstreaming of eligible refugees into public services and clarification of service access pathways for non-Syrian refugees. An additional need is to develop multi-sectoral complementary services for refugees who are not currently covered by existing public services due to their registration status, physical and technical capacity issues, eligibility criteria and limited specialised services. Such complementary support has to be designed in a manner that ensures sustainability, e.g. in partnership with municipalities or close collaboration with M/PDoFLSS on complex (child) protection issues. Good practise, such as TRC’s approach to “support Social Service Centres as embedding social workers” should be looked at.

A stronger gender perspective in programming including the dedicated assessment and development of targeted interventions is required to address the protection concerns and needs of women, girls, boys, men and LGBTI refugees. Moreover, it is essential to increase service delivery capacities by strengthening the interagency and *inter sectoral* collaboration at district levels, in an effort to address multiple factors that put refugee communities at risk. In line with SCIs expertise, this entails dedicated targeting of families with children and youth and responses tailored to address root causes of child protection concerns such as child labour and child marriage.

**3-Community Support Mechanisms and Resources:** In response to the research question 4 on resources and capacities at family and community level that should be built on to strengthen protection, resilience and self-reliance among refugees, the findings indicate that the community resources for support and information sharing are restricted to immediate family members, social circles and acquaintances. Whilst Syrians tend to utilise online information sources and depict a lesser trust in formal support and information sources; trusted NGOs, local associations and community leaders are more prominent sources in the case of non-Syrian refugees in Ankara. Municipalities, local teachers, mukhtars, women and youth active in the community were

noted by the participants as potential resources to increase information dissemination and contribute to community support. There is a need to identify outreach strategies to directly engage women and girls some of whom appear to access information via intermediaries such as men, community leaders and relatives.

**4-Refugee Groups in Need of Protection Services:** With respect to the research questions with a focus on the most marginalised groups, namely refugees in need of protection services as well as the factors contributing to their situation and their priorities (questions 2, 3 and 5), the findings indicate that multi-layered vulnerabilities such as language barriers, registration issues, poverty, social and gender norms, a sense of unpredictability of future in Turkey compound protection risks faced by Syrian and non-Syrian refugees. For children and adolescents, some of these risks are child labour, child marriage, a deteriorating psychosocial wellbeing, disruption in their education and drop-outs as well as non-enrolment to school. In addition, violence and exploitation in the household and in (unsafe) workplaces, coupled with limited ability and possibility among caregivers to care for their own as well as children’s wellbeing (e.g. healthcare, mental health, limited access to courses and trainings) are also present. The mentioned risks, needs and proposed recommendations are detailed at length in the table below.

Key Findings	Recommendations
<b>1. Protection Risks with respect to Registration Status</b>	
<p>Unregistered Syrian and non-Syrian refugees in Ankara and İstanbul are unable to access protection and basic services. This is due to persistent gaps in information dissemination, changes in policies which result in delays, pending applications for registration and also is due to misinformation by word of mouth among refugees.</p> <p>A part of this group (e.g. newcomers) likely remain unaware of the benefits of registration and of the risks affiliated with lack of registration.</p>	<p>Continue to disseminate accurate and up-to-date information on protection frameworks, registration procedures and the benefits of registration; coordinate the efforts with PDMs in Ankara and İstanbul.</p> <p>Utilise community-based information channels (in households, community leaders) and cooperation with other NGOs in order to increase outreach to most isolated unregistered refugees as well as to girls and women.</p>
<p>A significant part of unregistered non-Syrian refugees (i.e. in Ankara) are unable or unwilling to apply for International Protection status and to reside in satellite cities.</p> <p>Established family and community networks, availability of (irregular) jobs, perceived better service coverage and assistance, and uncertainty regarding future prospects limit their ability and willingness to move.</p> <p>Unregistered refugees, particularly single men, face a risk of administrative detention and deportation.</p>	<p>Collect and communicate assistive information in respect to registration under IP, e.g. identify nearby satellite cities where, at present, refugees under IP have some access to livelihood opportunities, as well as satellite cities with the presence of supportive community networks and NGOs which can facilitate assistance during the IP registration process and beyond.</p> <p>Explore the possibility of provision of cash assistance to enable movements to satellite cities (e.g. covering cost of accommodation, transport, basic needs in the initial months in the satellite city for those who are in a position to relocate.).</p>

	Provide information provision for unregistered men (including male youth) on registration as well as on hotlines to access legal assistance and aid.
<p>Refugees with short-term and humanitarian residence permits face challenges in accessing services. The reasons are related to lack of adequate information with respect to the rights and entitlements provided to residence permit holders by law. The risks following as a result are exacerbated by poverty.</p> <p>An increase in granting of humanitarian residence permits to Uighurs, Iraqis and Afghans of Turkic origin are reportedly prominent in İstanbul. This creates confusion and sense of favouritism among the rest of the non-ethnic Turk unregistered refugees.</p>	<p>Monitor the issuance of humanitarian residence permits and exchange information with public institutions (i.e. PDMMs, Governorships, District Governorships) and legal actors on the ground to understand the pattern and the ramifications.</p> <p>Sensitise refugee communities and stakeholders on the rights, entitlements and responsibilities stipulated under different types of registration statuses (e.g. TP, IP, humanitarian and short-term residence permits), including on the limited rights to access services under humanitarian and short-term residence permits.</p>
<p>New registrations for Syrian refugees in İstanbul have officially been ceased in July 2019 following a period of standstill and decrease in number of Temporary Protection IDs issued. At present, unregistered Syrian refugees and Syrians with TP registration in other provinces may face family separation and/or relocation to other cities in which they have not lived (in a long time).</p> <p>İstanbul Governorship announced specific criteria<sup>406</sup> for eligible Syrian refugees to re-register in İstanbul by 30 October 2019. These eligible groups are (i) Syrians with established businesses and their families, (ii) immediate family members of İstanbul-registered Syrians with registration in different provinces, (iii) children enrolled in school and their families, (iv) Syrians in higher education, (v) orphaned children in care of extended families.</p>	<p>In collaboration with stakeholders, extend legal assistance and accurate information flow to Syrian refugees with respect to registration in İstanbul, while continuing to monitor the impact of the policy change on the ground.</p> <p>Coordinate with public and non-governmental actors in provinces where most Syrians are registered and facilitate safe access and the relocation of Syrians who do not meet the re-registration criteria through referral and collaboration with UNHCR.</p> <p>Advocate with UNHCR and the respective PDMMs for thorough examination of appeals to registration on a case by case basis (e.g. to prevent family separation); and extend legal assistance to Syrians in need of support to provide relevant documentation for registration in İstanbul by 30 October 2019.</p>
<p>There are challenges in Temporary Protection ID renewal processes in İstanbul. The renewals reportedly require presenting prior documentation from country of origin or Turkey (e.g. ID, passport,</p>	<p>Provide legal assistance and facilitate access to legal aid for cases in need of court procedures and legal scrutiny.</p> <p>Support the collection of relevant civil documentation, facilitate communication with local</p>

<sup>406</sup>The İstanbul Governorship Press Release published on 27 August 2019, accessed via <http://www.İstanbul.gov.tr/duzensiz-goc-kayitsiz-suriyeliler-kayit-disi-istihdam-basin-aciklamasi>

<p>family book, birth certificate) which are not available to some Syrians.</p> <p>Moreover, the lack of marriage registration, birth certification of children born out of unofficial wedlock and errors of fact (<i>maddi hata</i>) in the case files of Syrians complicate renewal of TP registration.</p>	<p>state actors (e.g. Bar Associations, notaries, public hospitals, Department of Population and Citizenship Affairs <i>Nüfus Müdürlüğü</i>) in acquiring the required documentation for TPID renewals.</p>
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## 2. The Protection Context and Services in the Targeted Districts

<p>The eligibility criteria for public social assistance and protection services prioritises registered large households, children, (single) women, people with disabilities and the elderly.</p> <p>The eligible refugees however face challenges in making use of the aforementioned services due to stretched service delivery capacity and limited technical expertise among public protection actors (e.g. limited adequate assistance for single men, female and male survivors of SGBV, LGBTI individuals, sex workers, limited knowledge of the rights and entitlements of registered refugees other than Syrians, limited use of long-term supportive interventions for child protection issues).</p>	<p>Advocate for more inclusive eligibility criteria at local and provincial coordination meetings by exhibiting the issues encountered by refugee groups who are excluded from or have limited access to state services due to criteria.</p> <p>Undertake complementary service provision and referrals to specialised NGOs for refugees who do not meet the eligibility criteria to access public services (i.e. non-Syrians, refugees with registration problems), for those who may refrain from approaching public assistance mechanisms and for those in need for urgent support but who cannot access it due to over-stretched public social assistance and protection services.</p> <p>Design complementary service provision around vulnerable children and youth who are not sufficiently targeted by existing public services. This includes developing targeted interventions aimed at unaccompanied minors', child workers' in and outside of homes, and children's (in particular girls) at risk/of in child marriages, (homebound) girls' who are denied of social connections access to rights and services.</p>
<p>Service delivery capacities of Social Service Centres vary across the targeted districts in their service provision to registered refugees. This also applies to their level of engagement with NGOs and to their response periods and pursuant communication regarding referred cases.</p> <p>In general, the SSCs are stretched in their response capacities due to high caseloads, lack of mandate (for unregistered refugees), limited tools, language barriers (no staff speaking a foreign language other</p>	<p>Explore opportunities to support the SSCs capacities, including development of complementary programmes and activities in close collaboration with the SSCs (e.g. interpretation support to eligible refugees), collaboration on (child protection) case management processes and collaboration on coordination of services in complex cases.</p> <p>Pursue joint ventures with the Social Service Centres and other NGOs in the form of joint assessments,</p>

<p>than Arabic) and a shortage of staff compared to the case load.</p> <p>Undertaken interventions mostly remain restricted to registered refugees and mostly Syrians in the form of precautionary measures and to a lesser extent Social-Economic Support (SED) instead of longer-term coordination requiring interventions.</p> <p>Designated with a mandate of response to protection needs and also coordination of interventions targeting both host community and refugees, SSCs cannot single-handedly address multi-layered child protection issues such as child labour, child marriages.</p>	<p>outreach, case management meetings and mutual referrals that would facilitate eligible non-Syrian refugees' access to protection mechanisms and services.</p> <p>Continue to build trust with Ankara and İstanbul PDoFLSS and engage with both line ministries and Social Service Centre Task Force.</p> <p>Explore other ways of supporting the capacity of SSCs and other public social service providers, e.g. by deploying staff, complementary service provision on child protection issues.</p>
<p>Frequent changes in service related policies at the provincial and district levels, which are often regulated by internal decrees, lead to the late identification of shifts in service provision by both refugees and by frontline workers. There is limited up-to-date information on available services and access pathways for non-Syrians refugees to public services.</p> <p>The limited coordination and collaboration between public authorities (as well as a lack of dedicated authority to coordinate service provision among public actors for complex cases / case management), also challenges NGO front line workers in their engagement with various state agencies and poses difficulties in performing and tracking referrals (e.g. with PDMMs, PDoFLSSs, SSCs, school managements, PECs, ŞÖNİMs) in Ankara and İstanbul.</p> <p>A limitation on the part of public institutions on providing feedback upon referrals challenge NGO frontline workers in their follow up of cases (i.e. reception status, course).</p> <p>With varying degrees of coordination practice and openness amongst district-based state actors, they are not fully informed on the complementary and specialised services provided by NGOs on the ground.</p>	<p>Undertake regular district-level coordination meetings with the participation of major actors including NGOs, community-based organisations, MHCs, the municipalities, SASFs, District Governorships and representatives of schools with a high density of refugee students, in addition to actors mentioned in the left column.</p> <p>Utilise these coordination meetings as a forum to develop areas for collaboration among stakeholders, such as collective mapping of NGO and state services, establishment of mutual referral pathways and feedback mechanisms, and resource pooling to address complex (child) protection issues.</p> <p>Regularly share evidence-based updates (e.g. results of protection monitoring exercises and micro-assessments) on protection risks refugees face in the targeted districts (e.g. status of unregistered refugees, unaccompanied minors, child labour, child marriage, drop-out risks, women's and girls' access to protection mechanisms) and call for establishment of response mechanisms at district-levels.</p> <p>Link the engagement and support to horizontal coordination efforts between NGO-public authorities and <i>amongst</i> public authorities with vertical coordination efforts at national level (i.e. engagement with MoFLSS and the inter-agency Social Service Centre Task Force).</p>

<p>The protection risks prevalent in the urban context are multifaceted. They stem from complex factors linked to registration status, poverty, lack of access to information and misinformation on rights and responsibilities. These risks are experienced on different levels by refugee groups.</p> <p>Children and youth are particularly susceptible to the aforementioned risks. They face barriers in adaptation (i.e. language barriers, social and gender norms) or some conversely have better adaptation compared to their parents (i.e. language skills) and may face issues in the household with caregivers.</p> <p>Children and youth are also affected by the stress put on the households given the legal, social and financial issues and in turn are at risk of a deteriorating psychosocial wellbeing and assuming caretaker roles (domestic work or work in the informal economy).</p> <p>Establishing interagency response mechanisms to such complexities remains a major challenge with limited coordination at the national and provincial level among state actors as well as with limited evidence-based outputs exhibiting the protection risks prevalent in urban contexts such as Ankara and İstanbul.</p>	<p>Contribute to province-level policy making and resource mobilisation by actively sharing updates in Protection Working Groups and other coordination mechanisms at provincial (and national) level.</p> <p>Actively engage in sub working groups on child labour, child marriage and GBV, call for establishing relevant task forces in Ankara and in İstanbul.</p> <p>Target meaningful participation of children and youth (i.e. those out of school, boys and girls at risk of/engaged in child labour and child marriage, those who are denied of social connections in particular homebound girls) by integrated programmes focusing on psychosocial wellbeing, skills-building and rights awareness.</p> <p>Pursue integrated, holistic interventions by engaging in education and livelihoods activities and by gender mainstreaming into current (child) protection and MHPSS-oriented programmes.</p> <p>Advocate for increase in actors with expertise from different sectors in the targeted districts (e.g. livelihood, education, protection actors with specialised services targeting men, boys and LGBTI refugees).</p>
<p>Non-governmental organisations active in the protection sector have limitations in achieving long-term solutions for refugees who have multi-layered needs stemming from registration status, financial problems and language barriers.</p> <p>Most protection programmes achieve high participation rates for children and women, while youth, men and elderly are under reached in the absence of adequate programmes targeting their immediate needs.</p> <p>There remains a part of women and girls still excluded from protection services and activities. This group includes women and (adolescent) girls living in the peripheries of the targeted districts, those where conservative values prevail and pave the way for establishing limited social connections,</p>	<p>Expand language courses and skills-building activities particularly for youth and men whose turn out is low compared to women and girls and, where possible, ensure their access to such programmes in coordination with Public Education Centres.</p> <p>Increase outreach to homebound girls and women and their access to services by means of assistive measures (i.e. adequate hours, transportation assistance, community-based activities, design of relevant activities in line with their input and needs, targeting wider household to build trust).</p> <p>Engage livelihood and vocational actors in addressing job placement issues encountered by youth (of working age) and adults.</p> <p>Develop targeted interventions incorporating the input of youth (of working age) and adults with</p>

<p>those who take on a heavy load of house care responsibilities.</p>	<p>regard to their needs, identify and prioritise activities to increase skills-building and self-reliance of women, men and the elderly.</p>
<p>Bar Associations (BAs) take an active role in providing legal aid however have limited state allocated budgets and a shortage of lawyers. The BAs do not provide interpretation and translation services.</p> <p>For NGOs providing legal assistance and counselling there is an increasing need for specialised trainings on legal subjects and on protection topics, given the various types of issues requiring legal assistance and appeals (e.g. registration under TP and IP, administrative detention, access to education, SGBV, divorce, marriage, child labour, child marriage).</p>	<p>Continue to support access of refugees to legal aid with provision of legal assistance and interpretation support. Ensure interpretation support is provided by those who are skilled to communicate with refugee families and children on sensitive matters.</p> <p>Complement ongoing legal assistance efforts by assigning a dedicated lawyer to the programme in Ümraniye with experience in legal subjects of significance (e.g. child labour, registration, administrative detention, Social Service Law, Turkish Civil Law, Syrian Civil Law).</p> <p>Provide capacity building support on protection, referral pathways, and working with a child friendly and gender sensitised approach to legal assistance experts.</p>
<p>Language barriers continue to limit access to information and communication between Syrian and non-Syrian refugees with respective district actors. This complicates undertaking vital administrative procedures (i.e. house or work contracts, registration with <i>Nüfus</i>, registration of marriages, births etc.)</p> <p>Non-Syrian refugees in particular, face challenges due to limited information available in their languages and limited interpretation support.</p> <p>The number of interpreters assigned in public hospitals are not sufficient to meet the needs and the right to translation service is not known by some Syrian refugees (i.e. women and girls).</p> <p>Language barriers impede undertaking daily administrative procedures at service access points for both Syrian and non-Syrian refugees.</p>	<p>Scale up information provision and assistance with respect to administrative documentation processes.</p> <p>Prioritise interpretation assistance for non-Syrian refugees, particularly in Farsi and Urdu to access state services (e.g. interpretation support in Migrant Health Centres which, due to language barriers among others remains underutilised by Afghans, in SASF and in SSC, public hospitals).</p> <p>Explore opportunities to engage community volunteer interpreters in different languages to support refugees' access to services.</p> <p>Provide technical trainings on child protection and child-focused psychosocial-related issues to translators and interpreters, including how to communicate with families and children in distressful situations.</p>
<p><b>3. Community Support Mechanisms and Resources</b></p>	
<p>Due to the scarcity of available services and assistance, information sharing, and community support is limited among non- Syrian refugees (e.g. Afghans and Iraqis in Ankara). For these</p>	<p>Map out and identify community-based actors such as local associations (also established by refugees), local shops and community leaders among refugees.</p>

<p>communities, the support is primarily mobilised by those who arrived earlier, by local associations, shops established by refugees, host community and by those who have connections to service providers.</p> <p>Cultural and linguistic affinity to the host community appears to enable adaptation, access to community support and to information sources (e.g. Uzbeks, Turkmen). Ethnic and linguistic minorities among refugee groups struggle to access information and support (i.e. Iraqi Arabs, Hazara, Tajik, Farsi Afghans and Somalians in Ankara).</p> <p>The Syrian community, by factors of more targeted service provision and a good availability of information in Arabic appears to have relatively better access to information compared to non-Syrian refugees. However, increasing poverty and registration issues pose barriers against both utilising services and the provision of community support. Syrians are also more inclined towards community support and information sharing among family, relatives, friends, fellow townsmen and women.</p>	<p>Identify key gatekeepers from aforementioned groups who may act intermediaries to increase community support and convey information to other refugees without discrimination.</p> <p>Pursue community-led information provision engaging women active in the community and youth via social media channels to convey information on rights and services to their peers.</p> <p>Engage with mukhtars, imams and local shop owners who are most knowledgeable about the needs as well as about ongoing issues in the community and include them in dissemination of messages.</p> <p>Target ethnic minorities and smaller non-Syrian refugee groups with information provision and access to basic services.</p> <p>Specifically target women, girls, the elderly and LGBTI refugees whose access to community sources may be limited compared to that of men and boys.</p>
<p>A sense of diversity <i>within</i> the refugee communities reveals itself in the establishment of community structures. Where a rural versus urban divide as well as provincial affiliations play a role among the Syrian community, ethnic and religious differences play a role in the community support mechanisms among Iraqis and Afghans.</p>	<p>The social, ethnic and religious diversity within the refugee communities should be acknowledged and taken into consideration during programme design. The impartial, inclusive targeting of services must be made clear to the target groups (i.e. clear messaging on eligibility criteria, inclusion of all segments of the target groups in design and feedback sessions, effort to reflect the social diversity within the activities).</p>
<p>Community leaders' and local associations' impact and access to diverse communities vary across districts.</p> <p>The raised issues include a perception among ethnic minority Afghan and Iraqis on favouritism to refugees with Turkic origin (i.e. Turkmen, Uzbeks in Ankara), and a sense common to Syrians in Ümraniye on a lack of transparency and fairness of Syrian imams and local shop owners in their facilitation of information and charity-based assistance.</p>	<p>Continue to seek coordination with identified community leaders as well as NGOs who are in communication with different community sources on the roles, benefits/risks associated with engaging with community leaders.</p> <p>Engage with the Syrian community and deploy dedicated staff in understanding the role of Syrian gatekeepers in Ümraniye while in parallel develop communication with mukhtars, schools, local imams to increase visibility and credibility of available service provision in this district.</p>

<p>Community relations appear to be limited to small social circles, relatives and neighbours with decreasing levels of interaction observed between Syrian and non-Syrian communities. The sense of service provision specifically aimed at Syrians causes resentment among non-Syrian refugees. This may evolve into alienation of communities and possible conflict in the future.</p> <p>Relations between refugee and host communities appear to be restricted with pressure mounting on Syrian and non-Syrians to remain invisible due to the changing political landscape on refugees and the economic downturn in Turkey.</p> <p>Municipalities, local teachers, mukhtars, women and youth active in both refugee and host communities were raised as potential contributors to improved community relations.</p>	<p>Undertake collective activities in response to the needs of both Syrian and non-Syrian refugees (i.e. skills-building, income generation activities) and develop interventions that promote cross-learning.</p> <p>Engage with the host community with the support of local teachers, mukhtars, and municipalities. In particular, target the transformation of perception among teachers in public schools and vocational education centres, mukhtars in regard to refugees’ rights, capacities and resources.</p> <p>Continuously monitor the inter-community relations, convey risks on rising tensions with the host community to provincial and district-based actors and engage in common initiatives that also respond to the needs of the host community.</p> <p>Support peer-peer mechanisms for children and families, as well as for adolescents and youth from host and refugee communities.</p>
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#### 4. Refugee Groups in Need of Protection Services

<p>At present, public services are available to refugees who are registered in Ankara and İstanbul. This leaves a significant part of refugee communities residing in these provinces without registration out of the formal support network.</p> <p>Unregistered refugees’ access to rights and services are drastically limited. These include, emergency health services, enrolment in schools as guest students, admission to language and vocational courses is at the discretion of course administrations. The above mentioned ‘discretionary’ access is further impaired by inconsistent practices at service points.</p>	<p>Continue direct service provision in protection for unregistered refugees and referrals to specialised non-governmental organisations.</p> <p>Explore resource pooling options with stakeholders to assist unregistered refugees in high risk situations that trigger protection issues such as child labour, limited access to education, child and forced marriage, exploitation in the informal market (e.g. covering costs for lifesaving basic needs, health emergencies, conditional social assistance against child labour, advocacy for access and continuation of education of girls and boys.).</p>
<p>Unregistered refugees in practice cannot access skills-building activities offered by public institutions.</p> <p>Only a limited number of service providers admit unregistered refugees to skills-building and language courses (e.g. NGOs, Keçiören Municipality, and PECs at their discretion) that are essential to their self-reliance and adaptation.</p>	<p>Establish mechanisms to support unregistered refugees’ access to skills-building and Turkish language courses (i.e. partnership with education actors, advocacy for admission and recognition of certification by Public Education Centre courses, holding courses in own premises- in doing so incorporate key messages on registration, civil rights, protection services to expand information sources of refugees).</p>

Syrian and non-Syrian boys and girls are engaged in child labour in both Ankara and İstanbul. The working age is noted as low as 10-11, the working children mention “feeling compelled” to work to contribute to the household income. They work in unsafe jobs for long hours in places open to accidents, exploitation and abuse.

Social acceptance of child labour is prevalent in some households due to their lack of registration, aggravated financial needs in urban settings and an informal market readily available to engage children in work which are in proximity to refugees’ areas of residence.

There are institutional gaps in addressing the risks refugee children engaged in child labour face such as the lack of labour inspections in small enterprises, and the lack of a dedicated agency in the district-levels mandated to develop and coordinate response mechanisms that address the issue. At present, Social Service Centres in their already stretched capacities are primary agencies to identify, respond and coordinate measures.

Child marriages are escalating but, in most cases, are concealed in fear of legal sanctions. These marriages remain underreported and the prevalent risks to married children remain unaddressed.

Use of an awareness raising approach with a focus on penalties towards child marriage and child labour contributes to the hidden status of the child harming practices.

Poverty, social and gender norms such as traditional perceptions (i.e. young girls’ normative positioning as caretaker in the households, marriage being perceived as a better future prospect for girls), and safety concerns (particularly for girls) perpetuate child marriages.

Adolescent pregnant girls are deprived of civil rights, are also forced to seek healthcare in unlicensed clinics at the peril of their mental, emotional and physical wellbeing.

Engage with national stakeholders and UN Agencies to capacitate state and NGO protection actors in the response to risks pertaining to children and to establish provincial and district-based response mechanisms addressing child labour and child marriage.

Develop and conduct skills-building and PSS interventions, and information campaigns responding to the MHPSS needs of child labourers with the SSCs and public schools for that a number of refugee boys and girls are observed to work and study at the same time.

Undertake protection monitoring and document patterns and effects of child labour and child marriages in the targeted districts and advocate for the increased access of refugee children to CP mechanisms irrespective of their registration status.

Raise awareness on the importance of birth registrations and prevention of child marriage. Integrate child protection support, e.g. for married girls, provision of legal assistance, psychosocial support, development opportunities and Early Child Care and Development services for their younger children into the design of future programmes.

Advocate for the use of effective tools and longer-term support for children at risk of child labour and child marriage (e.g. counselling that includes care givers, access to education, skills-building activities and the provision of Social-Economic Support).

Target caregivers and host community in transforming social and gender-based norms that enable child labour and child marriage (e.g. mobilising community-based volunteers from the refugees’ own communities and community mobilisers from the host community, campaigns with NGOs and SSCs focusing on the mental and physical harm of child marriage and child labour on children more so than legal sanctions that appear to cause further concealment of these practices, activities which target the household as a whole such as adolescent boys and girls and their caregivers on adolescents’ development and needs).

<p>Existing protection mechanisms fall short of providing sustainable solutions to child labour and child marriage issues without addressing the wider economic, cultural and social problems at the community level as well as the legal loopholes (i.e. limited legal sanctions on enterprises that employ children, limited ability on prosecution of child marriages that took place in Syria, a lack of measures following identification of child marriages after the married child reaches the legal age of 18.)</p>	<p>Develop multi-sectoral interventions to address risk factors around children and their caregivers who may enable child labour and child marriage (e.g. effective job placements for adults, sensitisation of employers who enable child labour and uninsured work for adults, tailored skills-building activities with protection messages (also targeted at men), and day care services).</p> <p>With respect to child labour, utilise approaches such as dissemination of the Children’s Rights and Business Principles with Small and Medium Enterprises (SMEs) on district levels.</p> <p>Complement efforts that take place at national level on combatting child labour i.e. by the MoFLSS, UNICEF, Chambers of Commerce and confederations’ pilot work particularly in south- east Turkey on good practices around working with employers and SMEs, integrated programming on livelihoods and protection such as incorporation of rights of children into livelihoods sessions including with small enterprises.</p>
<p>The publicly available information on both child labour and child marriage is limited and outdated in Turkey.</p> <p>There is a shortage of studies on urban aspects of these protection risks pertaining to refugee boys and girls and on worst forms of child labour.</p>	<p>Undertake dedicated assessment of urban risks and impact of child labour and child marriage on refugee boys and girls where possible with PDoFLSSs, SSCs, academia and UN agencies at province-levels.</p> <p>Advocate for regular research, data collection and open source sharing at national levels.</p>
<p>Women and girls in the targeted districts are disadvantaged by factors of limited access to information and to social spaces. They generally have limited educational opportunities and, as a result education levels, and face language barriers.</p> <p>Primary information sources appear to be relatives, friends or males in the household with the exception of active WhatsApp and social media usage among some Syrian women.</p> <p>Protection risks are prevalent due to multiple vulnerabilities, poverty, a likelihood of violence in the family, in informal work (for both women and</p>	<p>Expand empowerment activities for women and girls (i.e. language, skills-building, information on civil rights and service access pathways, SGBV awareness sessions/venting groups where applicable conducted at community level).</p> <p>Establish information mechanisms in line with the most used channels by women and girls (e.g. targeting women who are active in the community, direct outreach to homes, markets, bazaars, use of phone and social media).</p> <p>In collaboration with the SSCs and other NGOs, target the increased inclusion of men and boys in activities pertaining to gender equality, child</p>

<p>girls, particularly Afghans) and denial of social connections.</p> <p>Lack of registration prevents access to basic services such as education, health which in turn impedes the timely detection and prevention of protection issues such as SGBV, child marriages and child labour.</p> <p>Women and girls further face challenges in accessing public protection mechanisms for example shelters due to registration status, lack of clearly defined access pathways and lack of interpretation services in police stations and in courts. The existing supportive measures are insufficient in shelters and ŞÖNİMs for both Turkish and refugee women.</p>	<p>marriage, child labour and the civil rights of refugee women and girls.</p> <p>Advocate for clearly defined pathways to access shelters and increased women empowerment activities, counselling provision by SSCs and ŞÖNİMs and also for child care services for women with dependents who are make use of these services.</p> <p>Support independent shelters which assist women and girls (e.g. financial or staffing sources, interpretation and coordination with state and other non-governmental organisations for long-term supportive interventions).</p>
<p>Boys and men suffer from vulnerabilities as a result of limited assessment of their needs, outreach and limited specialised assistance by service providers.</p> <p>Boys and men also take on work and the responsibility to care of themselves and their households. This limits their ability to pursue social services and skills-building. With amounting stress and work under exploitative conditions, they may resort to negative coping strategies such as substance addiction and negative peer relations or use of violence in the household.</p> <p>Single men are further susceptible to exploitation and abuse in shared housing. Discrimination and exclusion in the community and in the informal market may be prevalent due to their social minority status. They have few information sources, mainly peers, fixers, online sites and social media.</p>	<p>Undertake dedicated assessment with regards to information and protection needs of boys and men.</p> <p>Complement existing assistance schemes by conducting targeted outreach and providing information, social assistance, services responding to MHPSS needs of men and boys at risk.</p> <p>Map the information tools used by boys and men, (i.e. local shops, associations, employers, monitor social media use in the district) and make efforts establish better access to this target group.</p> <p>Capacitate own staff and stakeholders in working with men and boys in a gender and culturally sensitive approach, catering to their needs and priorities and by referrals to specialised MHPSS services (including for male survivors of SGBV).</p>
<p>Children as well as adolescent girls and boys are exposed to distinct vulnerabilities and risk factors around them.</p> <p>A part of refugee children appears to lack supportive social connections as well as parental support and supervision during their development stages. They face risks of violence and bullying in and outside of homes (i.e. in communication with peers, in school, work).</p>	<p>Continue to design protection and MHPSS programmes targeting children and adolescents with an age and gender sensitivity.</p> <p>Scale up psychosocial activities targeting children and adolescent boys and girls in particular in Altındağ, Ümraniye and Avcılar.</p> <p>Take into consideration exclusion factors of children and youth in these districts that affect turn out of this</p>

<p>Both boys and girls are at risk of harmful family practices such as neglect of their education, a lack of care and support during their education, being considered as caretaker at home and outside by working.</p> <p>Social norms and roles in the household put significant amount of pressure on adolescent boys and girls; where the former is increasingly considered as a source of support to family income, girls are at risk of denial of social connections and taking on care taker roles in the household which may normalise their ‘slipping into’ child or forced marriages.</p> <p>A sense of lack of security around girls, and a perception of ‘need’ to support household income affecting primarily boys enforce social norms and identify adolescent boys and girls with roles as care takers which impede their healthy development and future prospects in life.</p> <p>Limited targeted psychosocial programming for children and adolescent girls and boys is evident in Altındağ, Ümraniye and Avcılar.</p>	<p>group (i.e. lack of safe spaces, timing, social norms and values that impede girls’ access)</p> <p>Factor in the (prospective) impact of social risks, norms and roles enforced on boys and girls into existing activities (i.e. adopting holistic approaches targeting caregivers in long term activities, transforming social norms affecting children and adolescents, investment in peer to peer approaches and by expanding social circles and good role models around children and adolescents).</p> <p>Engage host community members (i.e. neighbours, teachers, employers) in addressing risks of violence and bullying, exclusionary behaviours affecting children.</p> <p>Undertake specific outreach to homebound girls, girls at risk of or in child marriages such as expanding protection and skills- building activities for young mothers.</p>
<p>Unregistered refugee children have difficulties enrolling into public schools and training centres due to legal and institutional impediments, language barriers, financial issues and limited future prospects seen in education by some caregivers.</p> <p>In a lack of formal access to education, caregivers are seen to opt towards Quran courses as an alternative for children’s education (e.g. Syrians in Avcılar and Ümraniye, Afghans in Ankara)</p>	<p>Advocate at provincial-levels with the PDoNEs and with the PECs for unregistered children to access form of mechanism of formal education (i.e. admission to schools, to PECs, alternatively availing open schools, online learning with accreditation and skills-building activities).</p> <p>Profile the needs of out-of-school girls and boys and seek development of life-skills, accelerated learning programs to address their needs.</p>
<p>The number of ALP courses provided in Ankara and İstanbul are not sufficient to support children who have missed out on education.</p> <p>The Early Childhood Education Programmes are reportedly unavailable to refugees in İstanbul and Ankara. However, there is ongoing work to increase the number of programmes as well as offering Early Childhood Education Programmes to registered Syrians in the 2019-2020 academic year.</p>	<p>Engage with the District Directorates of National Education and PECs on dissemination of the ALP and the Early Childhood Education Programmes for the registered Syrians. Advocate for access of all registered Syrian and non-Syrian refugees to both programmes.</p> <p>When/if availed, support the access of registered refugee children to these programmes in coordination with the district-based education actors.</p>

<p>Refugee children, particularly non-Syrians, have limited access to Early Childhood Care and Development (ECCD) services that would increase their wellbeing and socialisation with peers in addition to help early identification of disabilities or developmental issues.</p>	<p>Pursue partnership with organisations specialised on ECCD programmes and develop pilot interventions targeting children’s development and adaptation considering their potential to progress in the public education system.</p>
<p>Some refugee children in school face challenges in adaptation, developing supportive relations with peers (i.e. reported cases of bullying, discrimination) and have limited support from teachers and caregivers. This is particularly the case for children who have been away from school or are introduced to school for the first time.</p> <p>The drop-out rates increase with age, and also for girls after primary school due to social barriers (i.e. conviction of basic education being sufficient for girls, mixed-gender education).</p> <p>Whilst behavioural issues and aggression is attributed to boys, girls are acknowledged as being better at adapting to school. Yet, both girls and boys are under risk of isolation in the classroom and have difficulties in following courses and curriculum in Turkish language.</p> <p>School teachers encounter challenges in supporting refugee children due to language barriers and a limited technical capacity to attend to refugee children’s psychosocial needs. The teachers have further communication barriers (i.e. language, prejudice in between communities) against working with refugee and host community caregivers.</p>	<p>Undertake long-term participatory activities with children and youth in schools with a high density of refugee students (e.g. Child and Youth Resilience Programmes CRP/YRP - with a focus on child rights, child labour, child marriage, social cohesion, non-discrimination, gender roles).</p> <p>Pursue partnerships and collaboration with school administrations and PDoNEs to conduct community projects led by children and youth in schools to increase their self-reliance, use of skills and cooperation.</p> <p>Provide long-term assistance for increased retention of highly vulnerable children and youth in schools (e.g. financial assistance for school expenses, regular meetings with caregivers, catch up and remedial courses, language courses).</p> <p>Develop programmes to support the capacity of teachers to work with boys and girls in a child-friendly, gender-sensitive and inclusive approach, increasing their ability to engage both students and caregivers. (e.g. utilizing SCI’s global materials on promoting school safety, joint meetings with teachers of refugee students, participation in caregivers’ meetings in schools).</p>
<p>Refugee children appear to be struggling in between languages and cultures. This may be more prevalent in the case of Syrian boys and girls. Recently there is a strong focus on supporting Syrian children’s learning of Turkish language. However, there may also be a need to support their learning of Arabic (reading and writing in particular) to enhance their healthy development, communication with their families, rights and future prospects in the event of a return to Syria.</p>	<p>Examine the issues around a lack of access to learning opportunities in maternal language and its impact on children’s development.</p> <p>Thereby explore interventions such as provision of educational support in maternal language and/or tailor PSS activities’ conduct. (e.g. invest in activities to support Arabic language acquisition, increase number of Arabic-speaking staff who work with children etc.).</p>

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# ANNEXES

## Annex 1- Protection Risk and Gap Analysis Research Questions

### Overall research question

- 1) What strategic approach, interventions and dialogue with local and national duty bearers should NGOs/civil society pursue, to promote longer-term and sustainable protection solutions for the most marginalised groups?

### Sub-research questions with focus on the most marginalised groups

- 2) What factors increase and compound different population groups' vulnerabilities to protection risks in the targeted municipalities? Such factors include – but are not limited to – sex, age, disability, language, poverty, stigmatisation, discrimination, minority status, and legal, social and economic status, including if these groups are living as refugees, asylum seekers, migrants or undocumented foreigners.
- 3) Which groups are most in need of protection-related services in these districts to ensure their right to protection? What are the “characteristics” of these groups in terms of resources, capacities, vulnerabilities and threats in families or wider community that affects the degree of risk and protective factors?
- 4) What are the resources and capacities at family and community level which should be built on to strengthen protection, resilience and self-reliance among the most marginalised population groups?
- 5) What are the priorities of these groups regarding support to ensure their protection?

### Sub-research questions with focus on service provision

- 6) What are the programmes and services already in place to prevent and respond to protection concerns of the most marginalised groups at community and district level?
  - a. Are the criteria for services relevant to the most marginalised groups?
- 7) What are the trends or shifts regarding service provision and resource allocations?
- 8) What are the gaps and barriers at service-provision level that hinder the most marginalised population groups from achieving adequate protection?
  - a. Do information-sharing activities reach out to the most marginalised groups?
  - b. Are services physically reachable? Is there interpretation/translation support available?
  - c. Are the service providers trained/sensitised on the needs of the relevant marginalised group?
  - d. Do the services overcome issues in relation to confidentiality?
- 9) What are some promising practices and lessons learnt from UN- and NGO-supported Protection programming to promote longer term and sustainable solutions for the affected population groups (with a primary focus on programming in partnership with formal duty bearers, such as municipalities, social service centres)?

### Sub-research questions with focus on law and policies

- 10) What district-level policies are in place to prevent and respond to protection concerns of the most marginalised groups (recognizing that refugees, asylum seekers, migrants or undocumented foreigners are covered under diverse legal frameworks)?
- 11) How do these policies translate to the needs on the ground / impact the protection situation of the most marginalised groups?