

# Integrating Bottom-up into Top-down: The Role of Local Actors in Labour Market Integration of Syrian Refugees in Turkey

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## ABSTRACT

As Turkey has become one of the leading receiving countries for asylum seekers and refugees, not only new legislative initiatives regarding the legal status of Syrians, but also immigration policies have moved to the forefront of Turkey's agenda. In parallel with recent developments, the new *Regulation on Work Permits for People under Temporary Protection* was enacted in 2016. Among the 3,5 million, almost half of Syrian refugees residing in Turkey are of working age population, yet the majority have been engaged in the informal labour market. We know little about how this permit to work takes effect at the local level. Drawing on structured interviews with local actors in Adana, this article shows that the absence of an integration policy drives local actors to engage in the formulation of their own integration approach, what I call “*integration work*”, which results in varying degrees of collaboration within the same province.

## INTRODUCTION

Integration is characterized by multidimensionality. Correspondingly, its causes, effects and consequences are manifested in various forms. As characteristics of migration flows and migrants greatly diverge across various contexts, countries and cities, multi-layered patterns of integration policies have become more and more important in recent years. Integration is not a new phenomenon, however, “who needs to be integrated into what and how” (Capono and Borkert, 2010) has rather remained a pending issue on the agenda of not only destination countries, but also transit countries. Yet, there is no consensus on a single definition of “integration” (Castles et al., 2002). Migration scholars and policymakers still debate the role of different types of welfare states in developing integration models and the importance of the level of policy implementation – national or local.

On the one hand, scholars widely studied how the nation state plays a crucial role in understanding the design of immigration and integration policies throughout the 1990s (Brubaker, 1992; Soy-sal, 1994). On the other hand, scholars have started to emphasize the local dimension of implementation processes of integration policies over the last 15 years (Penninx, 2003, 2009; Alexander, 2007; Capono and Borkert, 2010; Jørgensen, 2012; Scholten, 2013). However, the geographical concentration of the local dimension of integration policies is mostly limited to the European context and the current literature mostly shows variation across cities within the same country

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or variation across countries (Garcés-Mascareñas and Penninx, 2016), but not variation within the same city.

Recognizing a rapidly growing body of research on Turkey – a country, currently hosting more than 3,5 million Syrian refugees – (see Betts et al., 2017, 2020; Erdoğan, 2017; Coşkun and Uçar, 2018; Daniş and Nazlı, 2018), this study documents how local actors can engage in efficient coping strategies and implementation mechanisms in response to the needs of refugees by moving beyond the scope of legislations. By scrutinizing local actors' responses to the introduction of a work permit scheme for Syrian refugees in Turkey (Official Gazette, 2016), I show varying degrees of collaboration among local actors in the case of Adana which has been a very significant economic hub for Syrians since the outbreak of the civil war. I first examine the fundamental incompatibility between the work permit scheme and local economic dynamics in Adana. Then, I demonstrate how the absence of local policy guidelines of the work permit creates an integration gap which must be filled by local actors, what I term: “*integration work*”. In the context of countries where regulations do not provide a basis for integration policies, local actors can introduce their own implementation mechanisms in line with their institutional and organizational logics (United Nations, 2017). Despite an extant literature on both national and local dimension of integration policies in different contexts, but we know little about how the lack of integration policies, envisaging coordination between central and local level mobilize local actors to introduce their own formulation and implementation mechanisms (Bruquetas-Callejo et al., 2008). This study addresses this gap, emphasizing the key role of both non-governmental actors and elected local actors in streamlining the work permit regulation and underpinning local labour market integration policies by serving as intermediaries in “*integration work*”. On the one hand, “*integration work*” can create a more welcoming environment for refugees in the labour market and contribute to the ad hoc mechanism of evolving integration policy in Turkey through collaboration with external funders, local governments and other public and non-public institutions and/or organizations. On the other hand, it may cause unevenness of arbitrariness of support such as local actors' differential responses to Syrians' economic integration, discontinuity of such responses and the possibility of not creating equal opportunities for all, since specific roles and funding are not officially attributed to local institutions and organizations.

First, the paper provides a bird's-eye view of the evolution of migration policies in Turkey over the last three decades. Second, it discusses conceptualization of migration and integration policies and synthesizes it with the Turkish context. Then, it will be followed by the methodology section. Next, I will introduce the work permit regulation, as an example, and argue that its regulatory framework is incompatible with local policy and labour market dynamics in Adana. In the next sections, the focus is on how a lack of labour market integration strategy streamlines “*integration work*” between different local actors. In the final part, the main contribution of this paper to the current literature will be summarized.

## CHARACTERISTICS OF IMMIGRATION POLICIES IN TURKEY

Until the last three decades, Turkey was a primarily immigrant-sending country rather than an immigrant-receiving one (Şanlıer Yüksel et al., 2019). In the late 1990s and early 2000s, Turkey experienced a visible shift concerning its migration patterns. The country has started to harbour not only refugees and asylum seekers, but also highly skilled individuals, economic migrants, students and lifestyle migrants (Şanlıer Yüksel and İçduygu, 2014). Turkey's transition from an emigrant to both a transit and destination country has also shaped its legislative framework on migration. *The Introduction of the Law on Work Permits for Foreigners of 2003* and *the Law on Foreigners and International Protection of 2014* represent new legislation paving the way for regularizing and institutionalizing Turkey's migration framework for the first time (Şanlıer Yüksel and İçduygu, 2018). Most particularly, *the 2014 Law on Foreigners and International Protection (LFIP)* is

regarded as a landmark reform as it is the first substantial regulation on migration and asylum flows specifying and addressing conditions of the stay for foreigners and their rights in Turkey (LFIP, 2013). Besides, the new law introduced the “*temporary protection*” status which guarantees the temporary stay of mass influx of displaced people to Turkey as in the case of Syrians (see Koser and Black, 1999 for the Bosnian case). Unlike European countries, Turkey still maintains the geographic limitation to the *1951 Geneva Convention Relating to Status of Refugees*, meaning that asylum seekers outside Europe are not recognized as refugees in Turkey. Therefore, Syrians in Turkey are treated under “*temporary protection*” status while their claim for refugee status and resettlement is evaluated by the United Nations High Commissioner for Refugees and the Directorate General of Migration Management of Turkey (DGMM). Accordingly, some fundamental rights are granted to those under the temporary protection such as access to health care, education and social services. However, the law did not stipulate temporary protection holders’ right to access to the labour market when it was first enacted. In 2016, the *Regulation on Work Permits of Refugees under Temporary Protection* was passed, aiming at structuring a work permit scheme and regularizing employment. However, the number of Syrians who participated in the formal labour market has remained rather low which was accounted for only for 31,185 by 2019 (Ministry of Family, Labour and Social Services, 2019). Considering that 2.1 million of the Syrian refugees (Kirişçi and Uysal Kolasın, 2019) are of working age in Turkey, it is not wrong to say that the majority of Syrians still actively engage in the informal market economy that is estimated between the range of 750,000 and 1,000,000 (International Crisis Group, 2018). I shall also note that I interchangeably use the terms of “informal market economy”, “informality” and “informal sector” in reference to “non-registration” which is defined as “avoidance of labour legislation, such as employers’ insurance contributions, minimum wage agreements or certain safety and other standards in the workplace” (Williams and Windebank (1998: 4).

## SIMILAR BUT NOT QUITE THE SAME: IMMIGRATION AND INTEGRATION POLICIES

“Integration” is defined as a “two-way process based on mutual rights and corresponding obligations of legally residing third-country nationals and the host societies” by the European Council (EC, 2003). This definition was expanded further by including the third actor – countries of origin – which goes beyond only targeting immigrants and host community as key actors in the process of immigrants’ integration (EC, 2011). Such definition places emphasis on not only the formulation of policies, but also the organization and implementation mechanisms of these policies which requires the involvement of different parties at various levels. To begin to understand why, we must first delineate the topic of study: for instance, a clearly and systematically established definition of “immigration policy” is still underexplored in migration scholarship. For the sake of clarity in this paper, I thus distinguish and define two terms: immigration policy and integration policy. According to Bjerre et al. (2015: 559), an immigration policy is “government’s statements of what it intends to do or not do (including laws, regulations, decisions or orders) in regard to the selection, admission, settlement and deportation of foreign citizens residing in the country”. Put differently, immigration policies are regulatory frameworks which enable countries to institutionalize and systematize the principles and procedures regarding foreign citizens’ entry to, stay in and exit from a host country and their legal rights. On the other hand, integration policies shall “guide and steer” integration processes of both immigrants and the receiving society (Garcés-Mascareñas and Penninx, 2016: 19). They shall go beyond the scope of migration policies by stipulating guidelines for how to implement. Regulating and governing of foreigners’ rights in host countries can be considered as part of integration policies but insufficient condition for streamlining implementation processes. This distinction is thus important because (1) integration policies are composed of not only immigrant group’s legal entitlements in host

countries; (2) but also their political, social and cultural rights “that is, they determine not only whether but also how immigrants live in the host country” (Bjerre et al., 2015: 562). Hence, (3) there is no single way of implementing integration policies which can be diverged and shaped by different dynamics even in the same country (see Spain and Italy) whereas immigration policies are characterized by its homogeneity which ensures immigrant groups’ equal access to their rights.

Given the complexity of governance of migration and integration policies at various levels across different contexts, top-down regulations and migration policies are not necessarily sufficient to foster integration and ensure take-up and implementation at the local level. Scholten (2013) identifies four types of configuring relations between government levels regarding integration policymaking. The first type is centralist approach (top-down), adhering to centrally driven policy frames and strategies not only at the policymaking level, but also at the implementation level. The second type adopts a localist approach (bottom-up), assigning local governments responsibility for not only implementation, but also formulating policies and reflecting on policy agendas. The third one is multilevel governance, referring to “interaction and joint coordination of relations between the various levels of government without clear dominance of one level” (Scholten and Penninx, 2016: 94). The last type is decoupled approach which is marked by the non-existing policy coordination *between* and *at different* levels. Given the divergences between different levels of integration policies, the Turkish case presents a more complex picture because centrally driven immigration policymaking exists; however, the country lacks an official integration policy. There are ongoing collaborations at the local level, but key local actors, such as municipalities, do not have official power and sources to formulate policies.<sup>1</sup> It is clear that Turkey is lacking multilevel governance approach in migration and integration policymaking, but this does not mean that there is no collaboration at all between different levels. The degree of collaboration changes from one context to another depending on local actors’ engagement in the formulation of their own integration approach.

The concept of “integration” does not appear in LFIP. Instead, the term “*harmonization*” is used in legal documents which can be described as a process “the migrant group can keep its cultural identity but live in “harmony” with the host society” (Hoffmann and Samuk, 2016: 10), “which does not require any substantial cultural adaptation” (Özçürümez et al., 2020: 8). The Article 96 of LFIP reads that:

- (1) “The Directorate General may, to the extent that Turkey’s economic and financial capacity deems possible, plan for harmonization activities in order to facilitate mutual harmonization between foreigners, applicants and international protection beneficiaries and the society as well as to equip them with the knowledge and skills to be independently active in all areas of social life without the assistance of third persons in Turkey or in the country to which they are resettled or in their own country”.
- (2) “Foreigners may attend courses where the basics of political structure, language, legal system, culture and history of Turkey as well as their rights and obligations are explained”.

With reference to the Article 96, there is neither official definition of “harmonization” in the law, nor its institutionalized regulatory framework to facilitate implementation mechanism. The article refers to the concept of “harmonization” only in relation to the DGMM’s duties without necessarily providing a formal definition and specifying the scope of harmonization activities. Besides, what kinds of duties harmonization entail are vaguely articulated. Only the DGMM’s website provides an official definition of harmonization which is described as “...is neither assimilation nor integration. It is rather a voluntary harmonization resulting from mutual understanding of each other between the migrants and the society” (DGMM, 2020). This definition remains mostly imprecise and ambiguous in two ways. Firstly, what distinguishes “harmonization” from “integration” is not explicated. Secondly, the definition does not account for any integration strategy and potential

implementation mechanism. It is not wrong to conclude that the way temporary protection holders' rights are formulated indicates that Turkey adopts a service-based approach (Yıldız and Uzgören, 2016) and develops policies accordingly without providing a guideline including rules and instruments that can facilitate harmonization both at the national and local level.

## THE EMERGENCE OF ALTERNATIVE POLICY FRAMES IN THE LEGAL AMBIGUOUS CONTEXT

So, where does the role of cities start if no overarching integration policy exists at the national level, nor any institutional responsibility is assigned at the local level in a given country whose legal context is ambiguous as in the case of Turkey? Scholars increasingly turn their attention to understanding how local actors position themselves in response to extension of social and economic rights to newcomers (Guiraudon, 2000; Jones-Correa, 2008; Chen, 2012). Even though migration policies are mostly formalized at the national level, there is no single form of experiencing of migration policies at the local level when it comes to implementation. As a consequence of variation in sociocultural, socio-economic and socio-political dynamics across cities or localities within the same country, local actors tend to engage with new strategies by employing their own experienced-based practices, by framing their own professional ethos and by deploying their own resources in response to the needs of immigrant groups. This situation leads to a mediation of national migration policies, that is the extension and reconceptualization of social rights by local actors as a result of different levels of interactions between receiving society and newcomers. Recognizing the heterogeneity of interactions at the local level (Faist, 1997; Collet and Gidley, 2013), understanding variation in the "level of the networks, communities and localities" is increasingly gaining importance in migration studies in relation to incorporation processes of immigrants and migration policy framing (De Haas, 2010). Gaps between the formulation and implementation of both migration and integration policies can mobilize local actors to bring forward any improvements for the well-being of newcomers.

In Turkish context, policymaking in almost all fields is very centrally driven, including migration policies (Betts et al., 2017). Although policy framing takes place at the national level, there are regional and local level public institutions which are responsible for implementation. At the regional level, provincial authorities, so-called governorates, serve as agents of the central state and provide services. In addition to governorates, elected metropolitan and district-level municipalities at the local level play a key role in providing services to residents of provinces. Mayors of both metropolitan and district-level municipalities of the same province can be elected from different political parties. In this respect, Adana represents a significant research site as it is characterized by political diversity. The city's elected metropolitan (i.e. Nationalist Movement Party – MHP) and district-level municipalities (i.e. Justice and Development Party – AKP, Republican People's Party – CHP) are ruled by three different political parties (at the time of interviews) that are embedded in different political ideologies. Consequentially, local approaches towards newcomers are likely to be shaped by the present municipal government's political ideology. This might automatically affect the extent to which local governments engage in facilitating reception and integration policies. Article 96, relating to the implementation of "harmonization", states that "the Directorate General may seek the suggestions and contributions of public institutions and agencies, local governments, NGOs, universities and international organizations" (LFIP). The shortcomings of this article can be summarized in two ways. First, no institutional responsibility to manage migration at the local level is explicitly assigned to municipalities. Nor are specific financial allowances for refugees allocated by the central government's budget (Betts et al., 2017). As described by Memisoglu (2017: 23), "this legal loophole leads to variations in municipality's role, from marginal involvement to active engagement" (also see Coşkun and Uçar, 2018; Eliçin, 2018). Second, other relevant actors as well

as local governments are also mentioned as potential collaborators to foster harmonization activities in Turkey. Yet, the scope of such potential collaborations and implementation mechanisms are not clarified. Unsurprisingly, not only municipalities, but also other local actors in this ambiguous legal context become even more important in understanding the role of local dynamics.

The introduction of the work permit regulation, whose legal framework is characterized by centralization, is a very important step in terms of opening the way for formal employment to Syrian refugees. However, the work permit regulation itself does not provide guidance on how to implement the practices necessary to achieve its given aims and goals. Since Turkey lacks a multilevel governance approach to immigration policymaking (Icduygu and Diker, 2017), the work permit regulation fails to address local socio-economic dynamics in terms of both Syrians' well-being and natives' concerns. From my standpoint, a lack of a labour market integration policy and coordination with the local authorities creates a context where local actors implement what I call "*integration work*" in line with their own institutional and/or organizational logics. A lack of overarching implementation and evaluation mechanisms allows the emergence of alternative policy frames at the local level. This integration work can be implemented by local actors in collaboration with external funders, NGOs and other public institutions. This study thus aims to reveal discrepancy of the work permit regulation when it comes to its implementation at the city level. Hence, it points out the importance of the role of local economic actors in streamlining "integration work" by enhancing more effective forms of cross-institutional collaboration at the local level.

## METHODOLOGY

This qualitative study is based on sixteen structured interviews with key informants, such as representatives of local non-governmental organizations (NGOs), foundations, municipalities and other public institutions, in Adana from November 2017 to April 2018 that were integrated with secondary data from national and municipal documents. Adana is selected as a research site for this study due to the large number of Syrians in the city, its high rate for informal market economy, and its political diversity as the elected metropolitan- and district-level mayors represent different political ideologies (at the time of fieldwork). The interviews' main aim was to reveal local institutions' and organizations' approaches and practices concerning Syrians' integration to the local labour market. The primary condition for the selection of organizations and institutions for expert interviews was not only their expertise in immigration and asylum, but also their institutional responsibility for economic activities at the province and region level. Therefore, "local actors" in this research does not only refer to those actively taking part in the local refugee response, but also include those potentially playing a crucial role in the design and implementation of labour market integration policies, such as professional chambers. In a nutshell, in-depth interviews with experts from two municipalities, three NGOs, eight local employment institutions and four other institutions helped me gain deeper insights into the socio-economic dynamics of the city, its Syrian refugees' socio-demographic composition as well as into institutional approaches to engaging Syrian refugees in the labour market.

### THE MISMATCH BETWEEN CITIES' ECONOMIC DYNAMICS AND THE WORK PERMIT SCHEME

The new *Regulation on provision of Work Permits for People under Temporary Protection* allows Syrians under the temporary protection regime to work legally. However, the right to work is not automatically granted; it is rather characterized by restricted eligibility criteria (Baban et al., 2017;

Rottmann, 2020). First, those under temporary protection are eligible to apply for work permit after legally residing 6 months in Turkey. Second, any application must be made to Ministry of Family, Labour and Social Services (2019) from province where applicant is first registered. In case employment is in another city than the one registered in, the authorization for relocation should be processed by the DGMM. Third, the number of working Syrians under temporary protection must not exceed 10 per cent of the employed Turkish citizens at respective workplace where work permit is requested, except agriculture and livestock sectors, requiring an individual application to Provincial Directorate of Labour and Employment Agency. Considering health and education sectors, the applicant should contact the relevant ministries before initiating the application procedure. Fourth, an application for a work permit must be made by the employer on behalf of employees unless self-employment is the case. Last, Turkish employers intending to hire Syrians must offer a contract which guarantees paying minimum wage and registering them with Turkish Social Security Institution (SSI). Both migration scholars and policymakers acknowledge the importance of Turkey's evolving national migration policies including the regulation for the work permit that gradually, but progressively empower refugees in Turkish labour market. Yet, there is still a long road ahead for Turkey in terms of transitioning Syrians from informal into the formal employment (Icdygu and Diker, 2017) and of developing more efficient implementation mechanisms considering how the work permit regulation takes place in the local context where refugees happen to work (Caponi and Borkert, 2010). The centrally driven nature of work permit scheme oscillates its practicality at the local level and brings forward challenging factors for not only refugees themselves, but also locals in Turkey.

### **From perspectives of Syrian refugees**

Six months waiting period to be able to apply for work permit can be lengthy. The waiting period might impose Syrian refugees to engage in informal market economy to sustain their life. Also, requirement on making a work permit application from province where applicant is first registered restricts Syrians' employment options as the applicant must wait until the DGMM authorizes relocation. Besides, more than one million Syrians in Turkey receive the direct unconditional monetary aid from the EU's European Social Safety Net (ESSN), channelled through the World Food Programme, the Turkish Red Crescent and the Turkish Ministry of Family, Labour and Social Services (International Crisis Group, 2018). In case of Syrians' formal employment with a valid work permit, cash assistance scheme will no longer be available (WFP Turkey, 2016). Furthermore, registration with SSI provides Syrians access only to the healthcare system which is already ensured under temporary protection regime. Nor does the regulation guarantee pension liability which means Syrians cannot either receive the right to a pension in Turkey or have any chance for portability of pensions if going back to Syria could be an option someday. Finally, there are still a significant number of temporary protection beneficiaries in Turkey who are not fully aware of their legal rights.

### **From perspective of employers**

The low number of issued work permits implies that the majority of working age Syrians still engages in the informal market economy. The story behind is multifold: (1) "cheap labour" is one of motivations why employers tend to hire Syrian refugees. The work permit fee requirement, costing 283, 20 Turkish liras, discourages employers as such fee is not the case for Turkish citizens. (2) As well as the fee, employers must ensure to pay minimum wage and to register their Syrian employees with SSI. (3) Syrians are mainly concentrated in low-skilled and labour-intensive jobs such as agriculture, construction, animal husbandry and manufacture where the rate for informality

is already high even among Turkish citizens. Therefore, employing Syrians informally remains more attractive for employers (International Crisis Group, 2016). (4) As mentioned above, one shall note that all employers – regardless of employing Syrians or not – are not informed of the work permit regulation. My fieldwork shows that employers' knowledge in work permit scheme and eligibility criteria is limited particularly in low-skilled sectors. This indicates that information flow from central authorities to state and non-state local actors and from local actors to employers and employees has not widely and thoroughly transmitted across economic sectors.

### **From local bureaucracy perspective**

Work permit was designed and regulated without making any sectoral analysis at the regional and provincial level. Thus, 10 per cent quota set by the Ministry poses a problem in three ways: (1) our knowledge is very limited about Syrians' professional qualifications since there is no available data on their labour force. Consequentially, we are not knowledgeable enough the extent to which Syrians' occupational profile match with cities' socio-economic dynamics such as types of available job opportunities or economic sectors grappling with labour shortage. (2) Some cities are overpopulated by Syrian refugees whereas others not. The unbalanced distribution of Syrians across cities does not comply with 10 per cent quota. For example, the number of Turkish citizens is 142,490 in Kilis – only 65 km away from Aleppo – while Syrian population is 108,239 that equals to 76 per cent of Turkish citizens' population. Implementation of quota regulation thus seems unrealistic (DGMM, 2020). (3) Regardless of existing in formal or informal market, many Syrians have started to run their own business in Turkey, and some of them have engaged in joint venture with their Turkish citizen business partners (International Crisis Group, 2018; Sivis and Yıldız, 2019). In such businesses, Syrians may seem more appealing to employers due to their occupational skills and the type of business. Especially in food sector where customers are mostly Syrians, employers prefer to employ Syrian cooks or bakers to ensure their customer satisfaction. Therefore, the needs of particular economic sectors may not always correspond to the quota system.

In distinct sections below, I will show how local actors go beyond the scope of the work permit regulation by implementing of their own institutional and/or organizational logics to encourage Syrians' employment in the formal labour market, resulting in different levels of incorporation among local actors.

## **DIFFERENT LEVELS OF "INTEGRATION WORK" AT THE LOCAL LEVEL**

### **Direct involvement**

Few local governments have actively played a remarkable role in initiating and implementing their unwritten integration strategy although regulations do not set forth any administrative obligations and bear responsibilities for municipalities concerning refugees' integration. However, my interviews with Adana Metropolitan Municipality and Seyhan District Municipality showed that they did not regard Syrian refugees distinctively from locals in terms of providing services. This evidently became clear in an interview with an official from Seyhan Municipality:

Some call them as 'asylum-seeker', some 'refugee', or some say 'guest'. As a municipality, we regard and approach to Syrians as our townsmen. For us, they are our townsmen. We acknowledge that 85 per cent of those people (Syrians) will be permanent here. As a municipality, we should consider the future of our district in this case. There are four different units in our municipality: employment unit, youth unit, disabled unit and social equality unit. There is no a separate migration unit because we don't discriminate Syrians from Turkish citizens. We are trying to do our best



to treat Syrians equally as we treat Turkish citizens. Also, our municipality does not favour just social assistance to Syrians; we really care about social inclusion.

During the interview, the official a few times highlighted that “they have some difficulties in finding financial sources”. A lack of financial sources drove them to collaborate with national and international organizations. For example, Seyhan Municipality took part in two projects, namely “Partnership for Realization of Expectation” and “Cash for Work”, aimed at providing decent employment and inclusive work opportunities for both Turkish citizens and Syrian refugees in different economic sectors.

In a similar but slightly different way, Adana Metropolitan Municipality started to engage in response to Syrian refugees’ integration at the local level and to collaborate with different national and international organizations. During the interview with officials from the municipality, it was emphasized that the Metropolitan Municipality has become aware of the importance of “immigration” and “immigrants” in Adana every passing day. Thus, the municipality attempted to identify Syrian refugees’ problems in Adana and, to take part in solution-oriented implementations although the Municipality’s responsiveness is also characterized by “selective-solidarity” approach, prioritizing those belonging to common kinship such as Turkomans from Syria and Iraq due to its nationalist stance (Betts et al., 2017, 2020). Unlike Seyhan Municipality, the Metropolitan Municipality established “a specific Unit for Migration Affairs” in 2018 to foster more effective communication and coordination between the municipality and other local, national and international organizations and institutions working on migration. The Metropolitan Municipality prioritized establishing more effective migration management at the city level as well as taking part in projects coping with different aspects of Syrians’ integration process in Adana, including employment.

Even though both municipalities were ruled by two different political parties, both regarded Syrians as a part of local community who should be integrated into the city. Both municipalities institutionally adopted more inclusive approach and strived for equal treatment between locals and refugees concerning their labour market integration because firstly, they regard Syrian refugees as “automatic clients to be served” (Marrow, 2009) regardless of their temporary legal status in Turkey. Secondly, both municipalities believed that local governments should take an active role in refugees’ integration as they are the most knowledgeable authorities at the local level in relation to city dynamics.

As well as local governments, there are other local actors having served as mediators in respective field. Due to lack of well-established coordination mechanism between the central authorities and local authorities, they developed their own institutional approach, deployed their own material and immaterial resources, and mobilized their network accordingly. To illustrate, Adana Chamber of Commerce organized several meetings with Turkey-Syria Works Council to identify what kinds of bureaucratic and economic problems Syrian entrepreneurs and firms were facing in Adana, and to report it to respective central authorities. As stated by an official from the Chamber, there were only eleven Syrian firms registered with the Chamber before 2011 whereas the number reached to ninety-nine in 2017.

The interview with the representative of Adana Shoe-makers’ Solidarity Association, established in 2012, revealed that footwear sector in Adana was also suffering from informality, unequal treatment between Syrian and local workers by employers and a lack of monitoring by respective public authorities. The respondent clearly pointed out shoe-maker firms took economic advantage of Syrians. Since this situation created contention between local workers and Syrians in shoe-making sector, the association introduced its own supervision mechanism in footwear market in Adana to tackle with unfair competition over wages:

As an association, what is important for us is whether everyone can get their money’s worth and everyone can work in decent conditions. If a Turkish worker sews a pair of shoes for 4 Turkish

liras, a Syrian worker should sew for the same price. Everyone should have the same conditions. We do not distinguish a Syrian or Kurdish worker from a Turkish one; what matters is that everyone should work under equal conditions.

A lack of efficient cooperation among local institutions and with the central authorities drives various local actors to develop different strategies which actually serve for the same purpose. Regardless of different levels of hierarchical structures across local institutions, their departure point is the same: equal and fair treatment without causing contention between locals and refugees and extending their services to Syrians as well. As a consequence of their own professional ethos, local actors, thus, developed variant forms of inclusive approach towards Syrians who deserve to receive equal treatment like other locals in response to their needs.

In addition to local public authorities, nationwide and international NGOs in Adana initiated enhanced collaboration-based dialogue with public institutions and implemented various projects with the intention of facilitating refugees' access to the formal labour market. The most common service provided by NGOs to both Syrian refugees and the locals was to support employment through vocational trainings, developed together with respective local authorities, in various occupational categories such as handicrafts, preschool teaching assistant, computer operating and hair-dressing. Although the Turkish state is predominantly responsible body for the current refugee policies, the importance of national and international non-state actors in integration debate is becoming more acknowledged by Turkish public authorities (Memişoğlu and Ilgit, 2017). Also, my interviews in Adana showed that the existence of NGOs was becoming more visible than before concerning integration of refugees at the local level, especially after local governments and other provincial public institutes started to show their openness for cross-institutional collaborations and their willingness for long-term sustainable solutions. According to NGO representatives, the reason behind this shift was the gravity of large engagement of Syrians in informal market economy in the city. As Syrians' existence has unreservedly become visible posing a threat to the city economy which is already suffering from large informal economy rate, cooperation between local authorities and NGOs became inevitable. As reported by respondents, vocational trainings have become more important in the light of recent collaborations of NGOs with local authorities because involvement of local public institutions in labour market integration projects empowered NGOs to place those who complete their trainings in respective public or private workplaces.

All in all, recent local initiatives and project-based international cooperation between NGOs and local authorities made vocational education and trainings more meaningful in the sense of (1) reducing refugees' dependence on social and financial assistance and creating more income opportunities; (2) fostering collaboration between local public institutions and NGOs; and (3) influencing positively integration processes of refugees such as providing employment opportunities within municipalities themselves. Such emerging collaborations can help counter fragmentation and unequal treatment, at least within the local level, and even as it does not ensure equal treatment across Turkey.

### **Indirect involvement: serving as facilitator in the field**

Although all local actors did not directly engage in refugees' socio-economic integration in the city, they indirectly supported and empowered refugees' socio-economic well-being by serving as facilitator in the field. Put differently, they rather passively advocated refugees' socio-economic integration at the local level and, played a relatively invisible role in mobilizing their material (fund-raising) and immaterial (network, advocacy etc.) sources concerning labour market integration.

Adana Chamber of Industry recently became more present in cross-institutional meetings about refugees' socio-economic integration and took part in few projects, aiming at enhancing and

strengthening Syrian refugees' employment skills. The representative summarized the Chamber's engagement:

Migration has never been the main objective of our institution. Our concern is to enable industrialists to staff qualified employees. We are more interested in demand for skilled employees rather than unskilled. This is how we have done our job so far. We are collaborating with NGOs and other organizations such as UN in this way: we circulate the calls of institutions or economic sectors suffering from labour shortage. In case Turkish citizens are not interested in such calls and Syrians want to apply, we inform employers about the work permit and its procedures.

Circulating calls within its network and providing voluntary consultancy service about work permit evidently pointed out the way local economic actors served as intermediaries between the central authorities and refugees without necessarily being obliged to do so. Another indirect way of fostering integration work between local actors and refugees in the city was to open calls for project applications and to specifically design the scope of the fund for disadvantaged groups in the region including refugees and their employment. In an interview, an official from Çukurova Regional Development Agency elaborated this point:

We serve as a more intermediary institution. We do not directly involve in project management, but rather support respective institutions in the field. We support any kinds of projects which aim at income-generating activities for Syrians and promoting their participation in social and cultural life.

As the region's knowledge in Syrians' profile was very limited, the Agency, in the early period of the humanitarian crisis, played a very active role in identifying Syrians' socio-demographic profile and their professional qualifications through collaborating with Disaster and Emergency Management Presidency. Within this period, the Agency mostly acted as a facilitator in the field. After national and international NGOs started to be psychically present in the region, the Agency rather continued to facilitate networking, to contribute to trainings and to provide funds for community development-oriented projects.

Institutional missions and responsibilities can be different from each other. Yet, it does not constitute an impediment to existing and further cross-institutional collaborations. Despite their limited involvement in the refugee response and their employment at the local level, what was common to these two institutions is that they have gone beyond the scope of regulation by accommodating a more welcoming environment and developing efficient coping strategies for Syrian refugees.

### **Non-involvement but open to collaborate**

In contrast to direct and indirect involvement of some local authorities and non-state actors, there were four public bodies among interviewees that did not actively engage in such programmes or collaborations. For instance, Adana Chamber of Merchants and Craftsman and Adana Chamber of Fashion, Textile and Garment-makers explicitly expressed their disappointment concerning that they were never been consulted before initiating such vocational trainings for refugees although they were open to cooperation with other institutions and organizations. They regarded their institutions as the most knowledgeable and reliable public body in their field, especially with regards to sectoral analysis at the local level for sustainability of vocational trainings. To illustrate, a representative from Adana Chamber of Merchants and Craftsman complains about lack of cooperation during the interview:

In my opinion, what is currently being done by NGOs is a garbage dump of ineffective machine equipment. For instance, they say 'we will give a computer course.' And, the course is given.

However, this course is not operated again. Why? They say we run out of our funds. So, the course is not run again. So, what about the sustainability of those projects? I think Chambers of Commerce and of Merchants and Craftsman should be informed and asked for possible collaborations before distribution of such funds on employment and labour market integration of refugees. There are many fund opportunities, but nobody contacts us.

An official from Adana Chamber of Fashion, Textile and Garment-makers made a similar argument about very restricted dialogue between professional chambers and NGOs when the issue comes to identify long-term labour market integration policies of Syrian refugees:

Chamber of Fashion, Textile and Garment-makers is the best knowledgeable institution in textile manufacturing sector. For these kinds of projects, they collaborate with Chamber of commerce. Their field of expertise is not manufacturing, they are expert in commerce. Nobody says that we could not achieve our goals if any responsible person from garment sector does not take part in. There is a need for garment cooperatives. There is a lack of collaboration. In such initiatives, garment sector leaders' opinion should be asked for advice.

It is equally important to note that there is a growing willingness among other public bodies to extend their services and assistance to Syrian refugees in just the same way as they treat citizens despite their non-involvement in developing and implementing Syrians' labour market integration at the local level. Their willingness to collaborate stems from the fact that (1) these institutions perceive Syrian refugees as residents of the city who should be able to benefit from local institutions' services as natives do and (2) strongly believe that cooperation with local public authorities in employment is a must to reduce Syrians' participation in the informal market economy.

## CONCLUSION

This article, through looking at the issue of the work permit to Syrian refugees in Turkey, shows that centrally driven regulations may not take effect at the local in the same way as projected. When the issue comes to implementation, regulations, in the lack of integration policies, are mediated by local actors depending on socio-demographic, socio-economic and socio-political circumstances and the needs of cities. Turkey's legal framework on migration has greatly evolved in the recent years; however, it is still characterized by certain limitations. The issue of the work permit to Syrian refugees is a very important step in facilitating Syrians' access to the Turkish labour market and encouraging their employment in the formal market economy.

Yet the right to work for Syrian refugees does not necessarily guarantee their integration into the labour market. A lack of accommodating the diverse nature of local dimensions of cities in migration policymaking has led local economic actors to adopt more pragmatic solutions and develop more cooperative strategies in the field. A legal loophole in migration management mobilizes local actors at the local level to show notable responsiveness to Syrians' engagement in the formal market economy. In other words, the lack of labour market integration policy results in displaying a more decentralized character when the issue comes to its practicality at the local level. Also, implementation strategies and mechanisms in labour market policy area remain open to local interpretation causing unevenness of arbitrariness of support. Twelve interviews out of sixteen indicated that there is a growing cross-institutional collaboration at the local level in Adana where local actors imply their institutional logics in line with their professional missions and ethos in response to Syrians' engagement in formal labour market (i.e. integration work). However, my findings also reveal that the degree and type of collaboration matter. They are hence shaped by divergences in the types of collaborations. Based upon such divergences, I identify three different ways of "integration work" at the local level. The first one is characterized by direct involvement of municipalities,

NGOs, other public institutions and associations. Different local economic actors actively support the socio-economic integration of Syrian refugees by taking part in international and national projects with a diverse range of stakeholders from civil society, by deploying their own material and immaterial resources for needs assessment and by fostering more efficient cross-institutional collaborations between respective authorities. For instance, Adana Metropolitan Municipality has created a separate migration unit whereas Seyhan District Municipality mobilized its existing units which serve for Turkish citizens in order to handle Syrian refugees' issues. In addition to adopting their institutional logic, they have become partner of civil society projects. The second derives from indirect involvement of local actors in Syrians' socio-economic integration into the city. They indirectly support and empower refugees' socio-economic well-being by serving as facilitator and advisor in the field. The last one is non-involvement of relevant local actors, referring to that they have not taken part in such collaborations and initiatives. However, they are open to extend their services to refugees and develop more collaborative and cooperative dialogue with other public bodies.

A lack of overarching implementation and evaluation mechanisms drive local economic actors to adopt service-based approach towards Syrian refugees and their involvement in the local economy. The emergence of alternative policy frames, in return, fosters integration work at the local level. As local actors engage with the formulation of their own integration approach in line with their institutional/organizational logics, this leads to varying degrees of integration work in the same province. Given difficulties in implementing the regulation in the local context, Turkey needs to formulate and assess its labour market integration policies by accommodating local dynamics. Therefore, a multilevel governance approach to migration policymaking should be adopted and more constructive and functional local labour market integration policies, equally addressing the needs and concerns of both Syrians and locals, should be developed.

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## NOTES

1. Although it is not yet officially announced, the new Harmonization Strategy of the DGMM (2018-2023) aims to strengthen the role of local governments in the mediation of migration policies at the local level as an official collaborator of the DGMM.

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## APPENDIX

### INTERVIEWS WITH INSTITUTIONS AND ORGANIZATIONS IN ADANA

Name	Interview Date
Support to Life (nationwide-humanitarian organization)	11.12.2017
Association for Solidarity with Asylum Seekers and Migrants (nationwide-NGO)	27.12.2017
Small and Medium Industry Development Organization	29.01.2018
Seyhan District Municipality	12.12.2017
Çukurova Development Agency	26.12.2017
Adana Chamber of Commerce	11.01.2018
Adana Chamber of Merchants and Craftsman	21.12.2017
Adana Chamber of Industry	21.12.2017



TABLE  
(CONTINUED)

Name	Interview Date
Adana Directorate General of Migration Management	15.01.2018
Shoe-makers' Solidarity Association	16.01.2018
Mediterranean Exporters' Association	08.01.2018
Vocational Training and Small Industry Support Association	22.12.2017
Adana Chamber of Fashion, Textile and Garment-makers	25.01.2018
Development Workshop Association	09.01.2018
Refleks Newspaper (the first and only regional economy newspaper)	07.03.2018
Adana Metropolitan Municipality	02.03.2018