



UPINION

## **Policy brief: The operating environment of migration-focused CSOs in Türkiye**

---

*April 2025*

# Executive Summary

---

This policy brief draws on desk research and eight in-depth interviews with migration-focused civil society organizations (CSOs) across different regions of Türkiye. These interviews, conducted as part of the selection process for Upinion's *Bridge to Safety* project, provide firsthand insight into the operating challenges these organizations face and the strategies they adopt to continue their work.

The findings of the study emphasize that migration-focused CSOs in Türkiye are facing a growing number of operational challenges. Rising anti-refugee sentiment and restrictive, changing legislation, bureaucratic obstacles, and shrinking international funding, often redirected to other global crises, are threatening the sustainability and impact of these organizations. Political instability, security risks, and a limited space for public advocacy further complicate their ability to support migrant communities, particularly for smaller or secular CSOs and those operating outside of major cities like Istanbul and Ankara.

Demanding labor laws, inconsistent access to work permits for refugee staff, and rapidly changing refugee law complicate CSOs' operations. Meanwhile, amid political instability and the contraction of civic space, political actors exploit anti-refugee rhetoric to galvanize nationalist support, using migration as a focal point, especially in electoral campaigns. This not only deepens societal divisions but also creates additional pressures for migration-focused CSOs, limiting their ability to engage in public advocacy or operate freely.

Despite these constraints, many CSOs demonstrate commitment and adaptability by adjusting their advocacy strategies, strengthening internal security measures, and actively exploring new funding sources. However, the need for more predictable, flexible, and long-term support is critical to sustain their work.

This policy brief outlines targeted recommendations for donors, UN agencies, and NGOs, such as:

- Expand inclusive and equitable funding tailored to local CSOs, including outside urban centers;
- Support equitable partnerships with INGOs and the UN;
- Provide legal and security support, and adapt funding to local labor laws and regulatory realities;
- Strengthen CSO-state dialogue and promote inclusive policy processes.

Under the Dutch Ministry of Foreign Affairs' 2023–2028 Migration and Displacement Grant Policy framework, Upinion will continue to monitor the operating environment of migration-focused CSOs in Türkiye, sharing annual insights to inform funding strategies and policymaking.

# Table of Contents

<b>Introduction</b>	<b>4</b>
<b>Methodology</b>	<b>4</b>
<b>Key findings</b>	<b>5</b>
Shrinking funding	5
Legal and bureaucratic constraints	8
Money laundering and anti-terrorism regulations	11
Political instability and security concerns	12
Freedom of expression and association	13
State-CSO relations	15
Corruption	16
<b>Conclusion</b>	<b>18</b>
<b>Recommendations</b>	<b>18</b>
<b>Future research</b>	<b>22</b>

# Introduction

---

Civil society organizations (CSOs) in Türkiye are on the frontlines of addressing the various challenges faced by migrant communities. Recent interviews conducted by Upinion with key CSOs in the country provide insight into the operational environment these organizations navigate. This brief summarizes our key findings and offers concrete recommendations to donors, government partners, and international organizations to encourage CSO effectiveness in addressing migration-related issues.



## Methodology

---

This policy brief draws on multiple data sources, including desk research, eight structured in-depth interviews with CSOs covering different geographical parts of Türkiye. The interviews were conducted with representatives of migration-focused CSOs in Türkiye who were in the selection process to become in-country partners of Upinion under the Bridge to Safety project, funded through the 2023-2028 Migration and Displacement Grant Policy framework of the Dutch Ministry of Foreign Affairs (MoFA). Their firsthand insights provide a valuable understanding of their operational environment, the challenges they face, and their interactions with government entities. All interviews were conducted in English and were recorded. By combining qualitative

data from these various sources and applying thematic analysis, this brief offers a comprehensive assessment of the current landscape for migration-focused CSOs in Türkiye.<sup>1</sup>

## Key findings

---

### *Shrinking funding*

A key challenge facing CSOs working with migrant communities in Türkiye is the growing difficulty in securing adequate funding.<sup>23</sup> This increasingly undermines the sustainability and effectiveness of their work, particularly as the needs of migrant populations continue to evolve.<sup>4</sup>

For many migration-focused CSOs, continuous international funding has historically been a key source of financial support. Donors such as the U.S. government (via the Bureau of Population, Refugees, and Migration – PRM), the European Union, and individual countries like Canada, Denmark (through Danida), and the Netherlands (via the Ministry of Foreign Affairs) have provided significant contributions.<sup>5</sup> Foundations such as the Fund for Global Human Rights and UK-based charities have also played a role in supporting their work.

The availability of international funding has been declining in recent years<sup>6</sup>, with representatives from various interviewed CSOs pointing to shifting donor priorities as the primary cause. Donors have redirected funds toward urgent global crises and security-related issues. For instance, ongoing developments in Syria have captured donor attention, as well as the war in Ukraine, causing a shift away from migration-related concerns in Türkiye.<sup>78</sup> Additionally, the freeze on U.S. funding has created further challenges, particularly for long-term planning, as CSOs face difficulties in securing consistent support.<sup>9</sup>

---

<sup>1</sup>Please note that the majority of this brief is based on a limited sample of eight interviews with CSO representatives and may not fully reflect the diverse experiences of organizations across different regions.

<sup>2</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>3</sup><https://dergipark.org.tr/en/download/article-file/3630147>

<sup>4</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>5</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>6</sup><https://www.rfi.fr/en/podcasts/international-report/20231202-turkey-s-embattled-civil-society-fears-the-worst-as-foreign-funding-dries-up>

<sup>7</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>8</sup><https://www.rfi.fr/en/podcasts/international-report/20231202-turkey-s-embattled-civil-society-fears-the-worst-as-foreign-funding-dries-up>

<sup>9</sup>Upinion interviews with CSO representatives, February and March 2025.

"We had this sudden program, funded by the Bureau of Population, Refugees, and Statistics that was initially suspended and then terminated, which unfortunately caused a serious blow to our operations. Because of that, our [number of] staff members decreased." - CSO representative

"I feel like the trend now is that the majority of donors are starting to focus on Syria. For example, we are currently trying to find funding sources for our center [in Türkiye], which will close when the project finishes in April. We are doing our best to ensure that the project will continue." - CSO representative

The ability to access international funds was mentioned by the interviewed CSO representatives to depend on organizational capacity, particularly the ability to write strong proposals, proficiency in English among senior staff, and established relationships with donors. Smaller, lesser-known organizations, notably those making first-time funding applications, often face significant barriers to success. While some UN agencies, like the UNHCR and UNICEF, maintain long-term partnerships with certain NGOs and provide larger grants, these opportunities are primarily available to larger organizations.<sup>10</sup> Furthermore, large international NGOs also implement projects directly themselves, which can limit opportunities for local CSOs to take the lead.<sup>11</sup>

"What does it take to access funding? Of course, you need to have English-speaking managers. You need senior leadership. You need to have opportunities to develop relationships with donors. It doesn't happen automatically." - CSO representative

"I mean, if you don't know the donor and you're making an application for the first time, it's usually not successful. But if you're able to meet the donor beforehand in some way—let's say you get an appointment, have a bilateral meeting, or even a brief encounter at a reception where you get the chance to talk about your work—it can be really effective." - CSO representative

"INGOs are implementing the projects themselves. They're not providing funding to us, the local NGOs. Since they have offices here, they can implement the projects directly." - CSO representative

When it comes to domestic funding, options remain quite limited for CSOs working on migration issues. For instance, while Regional Development Agencies (RDAs)<sup>12</sup> in Türkiye occasionally issue calls for proposals that local NGOs can apply to, the available budgets are often described as very limited.<sup>13</sup> Some national agencies do channel EU funds to Turkish CSOs, but access to these resources is frequently restricted—especially for secular organizations.<sup>14</sup> In contrast, CSOs affiliated with the government or municipalities are more likely to benefit from such funding.

---

<sup>10</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>11</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>12</sup> RDAs are public institutions established under Law 5949 to foster cooperation between the public sector, private sector, and NGOs. Their mission is to ensure the effective use of resources, accelerate regional development, unlock local potential, promote sustainable development aligned with national policies, and reduce both interregional and intraregional disparities.

<sup>13</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>14</sup>Upinion interviews with CSO representatives, February and March 2025.

For secular organizations, raising funds within the Turkish community presents additional challenges, as fundraising campaigns are typically permitted only for certain faith-based groups closely aligned with the ruling Adalet ve Kalkınma Partisi (AKP).<sup>1516</sup>

“There are different types of NGOs in Türkiye, with many faith-based NGOs closely aligned with the government and more religious NGOs that have gained special status, granting them the rights to run fundraising campaigns. For more secular NGOs, however, fundraising from the community is not allowed—they cannot collect money in a fair and legal way. As a result, most of their funding comes from international sources, such as the Presidency of Migration Management, the Bureau of Population, Refugees, and Migration, and donor countries. This puts these organizations in a difficult position, but despite the challenges and smaller sizes, there are still possibilities to survive.” - CSO representative

“Some faith-based Islamic organizations have much easier access to government funds, and I think it is restricted for more secular types of organizations. Actually, we [secular organizations] are not using the government money at all, as in any case our threat is a political threat because of our critical stance.

“There is a structure in which national agencies within the government distribute part of the EU funding to Turkish CSOs on a project basis. But we all know that secular organizations are less likely to receive these funds. It’s mostly municipalities affiliated with the ruling party or NGOs connected to the government that benefit from this kind of funding.” - CSO representative

The shifting funding landscape has posed significant challenges for CSOs working with migrant communities. Without consistent and predictable support, many organizations struggle to sustain their programs and retain staff.<sup>17</sup> The project-based nature of most funding further complicates long-term planning, as donor priorities frequently change.<sup>18</sup> At the same time, Türkiye’s high inflation and broader economic difficulties have driven up operating costs, placing even greater strain on already limited resources.<sup>19</sup>

In response, CSOs have been forced to adapt by focusing on lower-cost activities, such as advocacy through existing networks and media channels, or by strengthening their resource development strategies.<sup>20</sup> While there is increasing awareness of the importance of diversifying funding—such as tapping into private donors—this remains a considerable challenge for CSOs.<sup>21</sup>

<sup>15</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>16</sup>[https://www.eth.mpg.de/5268817/blog\\_2019\\_07\\_11\\_01](https://www.eth.mpg.de/5268817/blog_2019_07_11_01)

<sup>17</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>18</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>19</sup><https://www.reuters.com/world/middle-east/turkish-annual-inflation-falls-381-march-2025-04-03/>

<sup>20</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>21</sup>Upinion interviews with CSO representatives, February and March 2025.

"We have three human resource staff today but it will be reduced to one staff member in the next month. All these reductions and job losses are because of the shrinking in funding." - CSO representative

"The first strategy is to diversify our donors, so that if we lose one, we can continue with support from others. That's why we've been strengthening our resource development unit for the past year and a half [...] And the second way is to find private donors within Türkiye for example. We also are working on this. But it's quite a hard task to accomplish." - CSO representative

## ***Legal and bureaucratic constraints***

The Turkish government is intensifying its pressure on civil society through a combination of restrictive legislation, judicial harassment, police repression, and digital censorship.<sup>2223</sup> These challenges impact various aspects of migration-focused CSOs' operations, from registration and resource access to project implementation and advocacy for migrant rights.

Recent laws in Türkiye have increasingly restricted civil society space. The 2020 law on the financing of the proliferation of weapons of mass destruction has been used to justify audits and government-appointed trustees, significantly disrupting CSO operations.<sup>24</sup> The 2022 disinformation law and 2025 cybersecurity law expand state control over online speech and organizational data, with heavy penalties that deter activism.<sup>2526</sup> In 2024, a draft "foreign agents" law was additionally introduced, proposing to criminalize a broad range of activities deemed to be in line with the "strategic interests or instructions of a foreign state or organization" if these were considered against Türkiye's security or political interests.<sup>2728</sup> This law's vague and sweeping language raised serious concerns that legitimate civil society work, journalism, and human rights activities—particularly those involving international funding or criticism of the government—could be criminalized as espionage or treason, carrying potential prison sentences of three to twelve years.<sup>2930</sup> Although the "agents of influence" law was withdrawn in November 2024, government

---

<sup>22</sup><https://www.turkishminute.com/2024/03/13/report-sheds-light-on-shrinking-space-for-civil-society-in-turkey-under-state-pressure/>

<sup>23</sup><https://www.mlsaturkey.com/en/the-new-censorship-law-and-the-latest-situation-in-csos>

<sup>24</sup><https://www.amnesty.org/en/documents/eur44/4864/2021/en/>

<sup>25</sup><https://www.amnesty.org/en/latest/news/2022/10/turkey-dark-day-for-online-free-expression-as-new-disinformation-law-is-passed/>

<sup>26</sup><https://www.bicakhukuk.com/en/cybersecurity-in-turkey-key-developments/>

<sup>27</sup><https://www.amnesty.org/en/latest/news/2024/11/turkiye-proposed-agents-of-influence-law-is-attack-on-civil-society-and-must-be-rejected/>

<sup>28</sup><https://www.google.com/url?q=https://civicus.org/index.php/media-resources/news/interviews/7065-turkey-civil-society-can-still-defeat-the-foreign-agents-bill-if-it-plans-and-acts-strategically&sa=D&source=docs&ust=1744843039367857&usg=AOvVaw0b-qoswj6EqtpAmu44oX82>

<sup>29</sup><https://www.womeninjournalism.org/opeds/turkiye-foreign-agent-law-a-direct-assault-on-press-freedom-and-civil-society>

<sup>30</sup><https://www.mediadefence.org/news/foreign-agent-turkey/>

officials signaled that the proposal had not been permanently shelved and could return after further consultations or in a revised form.<sup>31</sup>

For CSOs working on migration, the country's legal framework is not only restrictive but also complex, unpredictable, and frequently changed without clear communication—especially with regard to refugee law.<sup>32</sup> CSOs face significant administrative burdens, including navigating securing permits and complying with shifting policies that impact both their operations and the rights of refugees—often without access to up-to-date information.<sup>33</sup> Regulations affecting migration-focused CSOs are not made public, creating uncertainty for organizations trying to comply with the rules. When information from authorities is formally requested, they often remain unanswered.<sup>35</sup> This lack of clarity makes it difficult for CSOs to plan and operate effectively, as they often face challenges in understanding what is required of them. These challenges were echoed in a previous Upinion study (Nov 2022–Feb 2023), where migration-focused CSOs described the same obstacles and underscored their urgent need for clearer guidance: access to up-to-date protocols, timely legal updates, and support in interpreting existing laws and procedures.

"Unfortunately, a lack of transparency is often very prominent. Many of the regulations that affect the field are not public[...] Very important procedural issues, for instance around temporary protection applications for Syrians, itself are not publicly available—only the Provincial Directorates of Migration Management have access to it, and they cannot share it because it is for internal use only. Despite being non-public, this regulation has had a significant impact on the field." - CSO representative

Following this, one of the primary challenges faced by CSOs is compliance with Turkish labor laws, which can also be demanding and may not always account for the specific needs of non-profit organizations.<sup>36</sup> For instance, requirements such as providing notice pay during layoffs can be difficult for CSOs that do not have reserve funding. This issue is particularly pressing for smaller organizations that rely heavily on donor funding, which may be inconsistent or unavailable at times.

"Turkish labor law is also very demanding and doesn't always take into account NGOs. As a result, compliance with labor laws can sometimes be an issue. For instance, when [name of a donor] abruptly ended the project, we had no choice but to lay off individuals. According to Turkish law, we are required to pay notice wages to those we lay off. So, we requested this payment from [name of donor] as part of the termination costs, and we hope to receive it. Otherwise, we will have no choice, as we don't have

<sup>31</sup><https://www.amnesty.org/en/latest/news/2024/11/turkiye-withdrawal-of-so-called-agents-of-influence-law-is-important-victory-for-civil-society/>

<sup>32</sup><https://link.springer.com/article/10.1007/s11266-020-00312-8>

<sup>33</sup> <https://data.unhcr.org/ar/documents/download/84795>

<sup>34</sup> Upinion interviews with CSO representatives, February and March 2025

<sup>35</sup> Upinion interviews with CSO representatives, February and March 2025

<sup>36</sup> Upinion interviews with CSO representatives, February and March 2025

any reserve funding, and it will be very difficult for us to meet these requirements." - CSO representative

Besides the challenges posed by labor law, there have also been significant changes to the laws regulating CSO financing.<sup>37</sup> As aforementioned, these changes have led to more frequent audits, which can sometimes seem arbitrary, along with financial pressures and fines. For example, organizations must report any funding they receive before they can use it, and they're required to submit annual reports outlining both their activities and finances.<sup>38</sup> If there are any discrepancies in these reports, it could result in hefty fines, making it really tough for organizations to manage their financial operations properly.

"We undergo government audits once every two or three years, and they can be very comprehensive. Last year, the audit was especially thorough. It was a very detailed government audit." - CSO representative

Refugee-led organizations face additional challenges, particularly when it comes to securing work permits for non-Turkish staff. An example of this is the "1-to-5 rule," which stipulates that for every foreign national employed, an organization must hire five Turkish citizens.<sup>39</sup> Additionally, obtaining work permits for Syrians or other non-Turkish nationals is often difficult and involves long waiting periods or the need to sign protocols with the Turkish government, leading to these CSOs prioritizing the hiring of Turkish over Syrian employees.<sup>40</sup> Upinion's study (November 2022 – February 2023) reaffirmed these obstacles for refugee-led CSOs, and additionally highlighted that work permit rejections for Syrian staff were often issued without clear justification, many organizations were unable to sign the necessary agreements or protocols with Turkish authorities to obtain permits, and they frequently lacked the capacity to hire sufficient Turkish staff to meet regulatory requirements.

"We have around 25 staff members, 22 of whom, like me, hold both Turkish and Syrian nationalities. We've made multiple attempts to obtain work permits, but we only have three work permits so far. This is because we signed a protocol with the Turkish government. If we hadn't signed it, we might have only received one work permit." - CSO representative

Beyond staffing issues, bureaucratic restrictions can also affect the efficiency of delivering services, especially when it involves migrant communities.<sup>41</sup> For example, opening branches in different provinces requires informing and gaining approval from the local governorate. Even basic activities, such as distributing aid in refugee camps or organizing meetings, often require coordination and approval from various government bodies, which can delay the implementation

<sup>37</sup>Upinion interviews with CSO representatives, February and March 2025

<sup>38</sup>Upinion interviews with CSO representatives, February and March 2025

<sup>39</sup><https://www.pwc.com.tr/en/service/ias/pwc-turkey-turkish-immigration-application-criteria.pdf>

<sup>40</sup> Upinion interviews with CSO representatives, February and March 2025

<sup>41</sup> Upinion interviews with CSO representatives, February and March 2025

of vital services. These bureaucratic obstacles can become more pronounced in areas with heightened social tensions between refugee and host communities, sometimes limiting the ability of CSOs to reach refugees effectively.

"When we implement economic empowerment programs, for example, we usually inform the municipality that we'll be spending money in the area and supporting certain groups. But when it comes to more sensitive topics, this can sometimes delay the approval process and cause a lag in starting activities. Bureaucracy often contributes to these delays." - CSO representative

"When opening a branch in any province, you have to apply to the governor's office, stating that you're opening a branch and outlining the projects and activities you'll carry out. You must inform the local administrative authorities, such as the governorate, and they will assess whether the NGO has any affiliations with certain ethnic or similar groups. Operating in this context is not always easy in Türkiye." - CSO representative

"Even when organizing a meeting—let's say in a hotel—you have to submit your name and ID number to a government office and get approval before you can hold the meeting. Without this approval, it's not possible to organize such events. This is just one example, but it illustrates the restrictions well, and there's even a law that regulates this." - CSO representative

"From time to time, depending on the level of social tension between refugee and host communities, administrative restrictions increase. Sometimes it becomes difficult for us to access refugees. You asked whether we're generally able to reach them—usually yes—but there are times when, in refugee-dense districts, you feel like someone is watching you, as if questioning, 'What are these people doing here?' These are the kinds of ups and downs we experience." - CSO representative

Overall, this restrictive environment was described by CSO representatives as difficult to navigate, where even a minor mistake could lead to the interruption of their operations.

"It's very tough; NGOs are very vulnerable. I mean, you can be 100% compliant with the law, but if they want to find something, they will find something." - CSO representative

### ***Money laundering and anti-terrorism regulations***

Turkish authorities have been criticized for the use of broad and vaguely worded provisions in the Criminal Code and Anti-Terror Law to suppress dissent. Articles such as 299 (insulting the President), 301 (degrading the Turkish nation or state institutions), and 314 (membership in an armed organization) have frequently been applied against journalists, activists, and civil society actors.<sup>42</sup>

---

<sup>42</sup><https://rm.coe.int/memorandum-on-freedom-of-expression-and-of-the-media-human-rights-defe/1680aebf3d>

In parallel, anti-money laundering and counter-terrorism legislation—particularly Law No. 7262 on the Prevention of the Financing of Terrorism, enacted after Türkiye was greylisted by the Financial Action Task Force (FATF)—introduced new compliance requirements for CSOs. While the law raised concerns about misuse, especially regarding the suspension of CSO employees, asset freezes, and administrative fines,<sup>43</sup> NGOs have also acknowledged that increased financial oversight helped address challenges in receiving foreign funding.<sup>44</sup> In some cases, cooperation between NGOs and authorities has led to the development of clearer compliance frameworks and best practices. Notably, Türkiye is no longer on the FATF greylist.<sup>45</sup>

The interviewed CSOs part of this study acknowledged the existence of these regulations and the need to comply with them, linking the increase in audits and financial pressure directly to these laws. Most described taking preventative measures to ensure compliance, such as vetting all staff members and contractors. If there is any suspicion, they also check beneficiaries' names against lists of terrorist groups. These records are maintained as part of the documentation required for government audits.

### ***Political instability and security concerns***

Türkiye's recent political instability, marked by the March 2025 protests following the detention of Istanbul mayor Ekrem İmamoğlu and over 100 opposition figures, has intensified concerns about democracy, the rule of law, and the security of CSOs.<sup>46</sup> Human rights organizations have expressed serious concern over government violations, citing instances of detainee mistreatment as well as increasing restrictions on freedom of expression and peaceful assembly.<sup>47</sup> This environment has pushed many CSOs toward informal networks or self-censorship to avoid accusations of opposition, terrorism, or foreign influence.<sup>48</sup>

The interviewed CSO representatives mentioned how any work related to refugees and migrants additionally has become increasingly sensitive in the current climate. They described how the restrictive environment—shaped by both stringent legislation and growing public anti-refugee sentiment—has significantly impacted the visibility of humanitarian organizations. Field staff, especially those working in border zones, are particularly vulnerable and often face direct threats.<sup>49</sup> One CSO representative, responding to what they described as a "persecution wave,"

---

<sup>43</sup><https://www.wilsoncenter.org/article/reinvigorating-civil-society-turkeys-electoral-autocracy>

<sup>44</sup> Personal communication with a legal expert in Türkiye, May 2026.

<sup>45</sup><https://www.reuters.com/world/middle-east/simsek-indicates-that-turkey-removed-fatf-watchdogs-grey-list-2024-06-28/>

<sup>46</sup>[https://en.wikipedia.org/wiki/2025\\_Turkish\\_protests](https://en.wikipedia.org/wiki/2025_Turkish_protests)

<sup>47</sup><https://www.icnl.org/resources/civic-freedom-monitor/turkiye>

<sup>48</sup><https://www.icnl.org/resources/civic-freedom-monitor/turkiye>

<sup>49</sup>Upinion interviews with CSO representatives, February and March 2025.

made the decision to scale back its social media presence to protect both the organization and its employees from potential backlash.

“Advocacy is becoming increasingly difficult and has impacted CSOs’ visibility significantly.” - CSO representative

Maintaining good communication with the government was highlighted as crucial, as differing perceptions between the government and CSOs can escalate security risks.<sup>50</sup> To mitigate these risks, interviewed organizations have taken proactive steps to ensure the safety of their teams and operations. As a result, many CSOs have established dedicated security departments or recruited security experts. These teams are tasked with monitoring the security context, updating staff on potential risks, managing conflict and incident reporting, and integrating security considerations into decision-making processes. Additionally, these organizations provide regular training on safety and security to ensure all staff are well-equipped to handle potential threats.

“We have security experts within the team who regularly inform staff of any relevant developments, just like ‘weather’ forecasts, but then on social tensions, or other safety and security concerns. These situations are closely monitored, and staff are reminded when necessary. In addition, during setup and orientation phases, all staff receive standardized training packages that include the code of conduct, safety and security protocols, and child safeguarding measures. Once activities begin, our safety and security experts continue to ensure that these standards are upheld across the organization.” - CSO representative

### ***Freedom of expression and association***

Türkiye’s increasingly restrictive political climate has severely curtailed freedom of expression and advocacy, particularly for organizations addressing sensitive issues such as refugee rights.<sup>51</sup><sup>52</sup> While the country’s constitution and its commitments under international conventions formally protect freedom of expression, in practice these rights are not upheld.<sup>53</sup> Widespread xenophobic attitudes, rising anti-refugee sentiment, and tightening government policies have led to a hostile environment that created a general sense of caution among CSOs. In this environment, CSOs, journalists, and human rights defenders face systematic legal action, harassment, and even closure of organizations. Hundreds of CSOs have been shut down in the past decade, and many activists have been prosecuted or imprisoned.<sup>54</sup> This environment has eroded trust in civil society,

---

<sup>50</sup> Upinion interviews with CSO representatives, February and March 2025.

<sup>51</sup><https://www.turkishminute.com/2024/03/13/report-sheds-light-on-shrinking-space-for-civil-society-in-turkey-under-state-pressure/>

<sup>52</sup><https://www.mlsaturkey.com/en/the-new-censorship-law-and-the-latest-situation-in-csos>

<sup>53</sup><https://www.civicus.org/index.php/media-resources/news/interviews/6401-turkey-the-government-does-not-tolerate-opinions-different-from-its-own>

<sup>54</sup><https://civicus.org/index.php/media-resources/news/interviews/7065-turkey-civil-society-can-still-defeat-the-foreign-agents-bill-if-it-plans-and-acts-strategically>

with only 1.13% of registered associations (1,552) actively engaged in rights advocacy as of 2025.<sup>55</sup>

"The context of Türkiye is very very precarious. You need to think twice about what you say." - CSO representative

The sensitivity of working on migration and refugee issues in Türkiye specifically seems to vary depending on several factors, including the political climate—particularly around election periods, when political parties, including those aligned with the government, often tap into or amplify anti-refugee sentiment to mobilize voters - as well as the specific topic and the visibility of the organization's work. While one CSO representative perceived that migration-related advocacy, particularly for Syrian refugees, may be relatively safer than other human rights issues such as minority and LGBTIQ+ rights, due to the government's initially protective stance toward this group and the recent narrative around their return, it is clearly still not without risk. Migration-focused CSOs continue to engage on critical issues such as access to asylum, employment, and social services.<sup>56</sup> However, the interviewed representatives emphasized the presence of clear "red lines" they must navigate carefully. These include direct criticism of government policy in relation to migration, commentary on the Turkish economy and rising inflation, and doing strong public advocacy.

"We usually write reports that are not intended for the public, as in our context, critical reports—especially when made public—are not well received." - CSO representative

"The media, political groups, and even religious bodies can quickly label you, regardless of the reality. For example, if you say something factual about refugees - like issues around school enrollment, which is a very common topic - campaigners, political parties, or other NGOs might immediately target your organization. They'll label your NGO as a 'refugee-focused' or 'refugee-promoting' organization, even if you're simply stating facts or advocating for basic rights." - CSO representative

"By law, they [CSOs] are free enough... but in practice, there are limitations, especially on sensitive issues, like when you talk about refugees. In the end, whether it's government actors or individuals, there's often pressure to keep a low profile and to discourage you from speaking about certain topics. For example, the 2016 agreement between Europe and Türkiye included many regulations aimed at ensuring the safety, dignity, and job opportunities for refugees—particularly Syrians—but these promises were not reflected in actual practice. So, if you will be speaking about this, by law you can, but in reality bureaucracy and informal pressure make it very difficult." - CSO representative

To navigate this current climate, interviewed CSO representatives described how they need to be more cautious and strategic in their public communication, often favoring less public and more direct or indirect advocacy methods to navigate the sensitivities of the environment and avoid

<sup>55</sup><https://www.icnl.org/resources/civic-freedom-monitor/turkiye>

<sup>56</sup>Upinion interviews with CSO representatives, February and March 2025.

potential negative repercussions. For example, the increasingly negative public discourse—often amplified by the media—was said to create a challenging environment for public advocacy campaigns. As a result, CSOs' advocacy strategies are primarily focused on private settings with government authorities (primarily governors and representatives from the Ministries of Education and Health) and international actors, where maintaining strong, individual relationships with relevant government actors is key. Participation in coordination meetings and protection clusters, especially those led by international organizations such as UNHCR, provides another avenue for advocacy and collaboration. Working through Turkish-led organizations or forming local partnerships also helps CSOs build credibility and navigate political sensitivities more effectively.

To further avoid triggering backlash, CSOs adopt diplomatic language and frame their advocacy in reference to international legal standards, as well as some prefer to share information with international organizations or channel concerns through international platforms, rather than making public statements domestically.<sup>57</sup> Direct retaliation for strong advocacy is rare but not unheard of, which reinforces a tendency among organizations to keep a low profile and avoid public confrontation.

"We have to be more skilled in using diplomatic or politically acceptable language—framing our criticism in a more polite, non-accusatory, and less harsh way. Being more persuasive and referencing international law helps keep us safe, especially since we have the advantage of working within the clearly established framework of international refugee law, unlike in some other areas." - CSO representative

"Sometimes, with major advocacy organizations like Human Rights Watch and Amnesty International, we provide information while we are choosing to remain anonymous. They can then use our information for public advocacy." - CSO representative

### ***State-CSO relations***

The relationship between the Turkish state and CSOs has traditionally been one of tension, as the state tends to cover all aspects of life, leaving little room for independent civil initiatives.<sup>58</sup> This centralization of power can create friction, especially for CSOs working in areas like migration and refugee support. In general, CSOs often feel they are secondary players in the field, after the government and larger organizations.<sup>59</sup> As a result, they must navigate a complex landscape where authorities' agendas take precedence. The level of cooperation between CSOs and government entities can vary widely. While the CSO representatives mentioned some level of engagement with certain ministries—such as the Ministry of Family Affairs and the Ministry of Education—overall cooperation, especially with newer bodies like the Presidency of Migration

---

<sup>57</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>58</sup><https://researchonline.gcu.ac.uk/en/publications/t%C3%BCrkiyede-devlet-sivil-toplum-kuruluslari-iliskisi-v-e-sivil-toplu>

<sup>59</sup>Upinion interviews with CSO representatives, February and March 2025

Management (PMM), is perceived as limited.<sup>60</sup> The CSOs report challenges in obtaining information or engaging in meaningful dialogue with authorities, making collaboration difficult.

"In Türkiye, there has traditionally been some tension between the authorities and civil society, because the state tends to try to cover every aspect of our daily lives [...] However, Türkiye is a really big country, so the state has difficulties being everywhere." - CSO representative

"Generally – and again, not all public institutions – but for example, the Presidency of Migration Management usually does not want to contact or collaborate with us. On the other hand, the Ministry of Family and Social Services does want to collaborate with us. When we try to reach out to the Migration Management Center, sometimes even the Ministry of Family and Social Services can't reach them either." - CSO representative

Additionally, there is a sense that the government may view CSOs with suspicion, particularly those operating in dynamic regions with large migrant and refugee populations.<sup>61</sup> These organizations are sometimes perceived as "dangerous," as their work can be seen as politically or socially contentious. Maintaining neutrality is a challenge, as authorities may categorize organizations based on perceived religious, political, or ethnic affiliations, further complicating their ability to operate freely.

"Sometimes they say that NGOs working with migrants and refugees are considered more risky than other local NGOs, because they operate in more dynamic or sensitive areas. Maybe there's concern that someone linked to terrorism could be among those populations. That's why NGOs working with migrants and refugees might be considered higher risk." - CSO representative

CSOs with "public benefit status" often experience a more aligned relationship with government priorities, as this status is granted after a thorough review to ensure that their activities support the government's goals. However, this status can also lead to closer scrutiny and an increased risk of compromising organizational independence.

"You do your best, but the government doesn't recognize your reputation, only if your organization belongs to the government." - CSO representative

## Corruption

Türkiye scores 34/100 on Transparency International's 2024 Corruption Perceptions Index (below the global average), reflecting systemic governance challenges.<sup>62,63</sup> High-profile cases, such as the

---

<sup>60</sup>Upinion interviews with CSO representatives, February and March 2025

<sup>61</sup>Upinion interviews with CSO representatives, February and March 2025

<sup>62</sup><https://tradingeconomics.com/turkey/corruption-index>

<sup>63</sup><https://turkishminute.com/2025/02/05/opinion-how-corruption-become-national-security-threat-fr-turkey1/>

Imamoglu corruption probe (2025) and unresolved allegations against AKP-linked officials (e.g., former Ankara mayor Melih Gökçek), highlight politicized enforcement in the country.<sup>64,65</sup>

Although direct cases of corruption hindering operations are not widely reported across all interviewed CSO representatives, a persistent lack of transparency at governmental and institutional levels presents significant challenges for CSOs working on migrant-related issues in Türkiye. As aforementioned, organizations mentioned that many of the regulations affecting their work are not public, making it difficult to fully understand or comply with the legal framework surrounding migrant assistance.<sup>66</sup> Additionally, CSOs face arbitrary audits (e.g., Law No. 7262), trustee appointments, and closure under vague terrorism or corruption charges.<sup>67</sup> This issue extends beyond legal ambiguity. The absence of clear, accessible procedures within government institutions—such as the uncertain roles and responsibilities of migration officers—raises broader concerns about institutional accountability.

While explicit incidents of corruption are mentioned less frequently, some interviewed organizations have encountered situations that suggest underlying risks. One CSO reported that an official attempted to influence a procurement decision by steering them toward a specific supplier. Although the organization successfully resisted this attempt by adhering to strict internal policies, the incident highlights the potential vulnerabilities CSOs may face in their daily operations.

“Of course, there have been attempts to push us toward corrupt practices, but fortunately, we’ve been able to push back within the legal framework. For example, just last week, we received a request from an official related to one of our activities — purchasing books for a children’s library. He directly asked us to buy from a specific supplier. However, according to our policy, we must publicly announce the procurement, receive multiple quotations, select the winning bid, and then proceed with contracting.

Although there was no specific law forcing us to follow this procedure, we referred to the NGO regulations, which allow organizations to adhere to their internal policies. We simply showed him our procurement policy and made it clear we would follow it. We were confident enough to stand our ground.” - CSO representative

In addition, there are widespread concerns about favoritism. Some interviewed CSO representatives feel that those with certain political, religious, or institutional affiliations are more likely to gain access to government funding or favorable treatment. This perception contributes to

---

<sup>64</sup><https://theconversation.com/the-peculiar-turkish-corruption-issue-behind-istanbul-mayors-arrest-and-how-it-became-a-tool-of-political-oppression-252933>

<sup>65</sup><https://turkishminute.com/2025/02/05/opinion-how-corruption-become-national-security-threat-fr-turkey1/>

<sup>66</sup>Upinion interviews with CSO representatives, February and March 2025.

<sup>67</sup>[https://knowledgehub.transparency.org/assets/uploads/helpdesk/313\\_Overview\\_of\\_corruption\\_and\\_anti-corruption\\_in\\_Turkey.pdf](https://knowledgehub.transparency.org/assets/uploads/helpdesk/313_Overview_of_corruption_and_anti-corruption_in_Turkey.pdf)

an environment of inequality and mistrust, making it harder for independent or secular organizations to carry out their work on equal footing.

"It's true that issues like corruption and favoritism exist. For example, as I mentioned earlier, some faith-based Islamic organizations have much easier access to government funds." - CSO representative

"In our case, as a more secular organization, we don't use government funding at all, as we are a political treat, linked to criticism of certain policies." - CSO representative

## Conclusion

---

The policy brief underscores the increasingly precarious operating environment for migration-focused civil society organizations in Türkiye. A rising anti-refugee sentiment, fueled by public discourse and media narratives, coupled with a tightening legal and political landscape, has made migration a highly sensitive issue. Shrinking international funding, often redirected to other global crises, and limited domestic funding options, particularly for secular organizations, further threaten the sustainability of these organizations. Additionally, restrictive and changing legislation; bureaucratic hurdles; limitations on freedom of expression and association; political instability—highlighted by events such as the March 2025 protests; security concerns; and the often-strained relationship between the state and CSOs, along with perceptions of corruption and favoritism, significantly hinder their ability to effectively address the needs of migrant communities.

Despite these considerable obstacles, CSOs in Türkiye demonstrate remarkable resilience and adaptability. They navigate the complex environment by adjusting their advocacy strategies, often favoring private channels over public ones, prioritizing security measures with dedicated security teams, and actively seeking alternative funding sources. However, the need for sustained and predictable support, both financial and legal, is critical to ensure their long-term impact.

# Recommendations

---

Based on the findings of this study, the following recommendations aim to strengthen the operational environment for migration-focused CSOs in Türkiye and enhance their sustainability, effectiveness, and impact. These recommendations focus on key areas such as funding, legal support, security, and collaboration between local and international organizations.

## **To donors (including the EU and EU governments):**

### *Funding support for migration-focused CSOs*

- Increase the number of funding opportunities that explicitly involve local civil society partners in both the design and implementation of migration-related programs. Prioritize mechanisms that support sustained, long-term partnerships, which are critical for local organizations to build resilience and maintain impact over time. Given the current operational environment, this presents a strategic opportunity to enhance their roles in migration programs.
- Ensure that funding structures actively promote equitable partnerships between INGOs and national or local CSOs. Frameworks like the Netherlands MoFa's 2023-2028 Migration and Displacement Grant Policy framework demonstrate how funding mechanisms can require INGOs to collaborate on more equal terms. By embedding clear guidelines and accountability measures, donors can prevent power imbalances and ensure that local CSOs receive adequate resources, including coverage for administrative and security-related expenses.
- Prioritize funding for migration-focused CSOs outside major urban centers like Istanbul and Ankara, including smaller, less-established organizations. Supporting these CSOs helps to create a more diverse and resilient civil society that reflects the varied needs of different communities, as well as enhances reach and sustainability of donor-supported initiatives, ensuring a wider and robust impact across different regions.
- Funding should prioritize and incentivize initiatives that actively foster cooperation and structured dialogue between migration-focused CSOs and national or local authorities. This includes supporting joint projects, regular consultation mechanisms, capacity-building efforts for collaborative governance, and platforms for inclusive policy dialogue. Such engagement strengthens mutual trust, enhances the effectiveness of public policy, and encourages that the voices of diverse communities are reflected in decision-making processes.

- Encourage funding and programs where organisations like IOM, UN, and other international actors collaborate more closely with local migration-focused CSOs, leveraging local partners' invaluable insights, visibility, and ownership to enhance program effectiveness and sustainability.
- Invest in ongoing analysis of the civil society environment in Türkiye, regularly identifying key trends and impact on operations. A deep understanding of these factors enables donors to engage effectively and support meaningful activities and reforms.

*Legal environment and civil society space protection*

- Promote the protection of civil society space by encouraging migration-focused CSOs to include dedicated budget lines for external legal counsel in project proposals. This enables organizations to access timely legal support to navigate complex and evolving regulatory frameworks, helping them operate effectively, avoid arbitrary suspensions or penalties, and safeguard their rights to advocate and deliver essential services.
- Develop a joint donor policy with CSO partners. Work with local CSO partners to develop a clear and shared framework on how to balance operational visibility, political sensitivity, and security risks. This could include guidelines on donor branding, communications, and risk management, particularly in autocratic or hybrid regimes.
- Support public awareness campaigns that highlight the critical role of CSOs in addressing migration-related challenges, while ensuring they avoid direct criticism of the government and its policy. By promoting the value of local civil society organizations, their institutional and public recognition can be encouraged, moving beyond suspicion and restrictions.
- Actively monitor any restrictions placed on migration-focused civil society. Regular monitoring of restrictions can help inform policy and ensure that civil society's ability to address migration challenges remains intact without putting organizations at undue risk.
- Prioritize funding and programmatic support for CSOs that provide legal and psychosocial assistance to individuals at risk of deportation. These organizations play a critical role in safeguarding human rights, offering dignified support to vulnerable individuals, and ensuring procedural fairness.
- Adapt funding and support mechanisms to reflect the legal and financial obligations CSOs face under demanding labor laws. In contexts where CSOs must comply with regulations similar to those of private companies - for example covering full salaries, social security, insurance, and severance - funding should allow for flexible budgeting that includes the true cost of (human) resources. This is essential to ensure fair employment, legal compliance, and the long-term sustainability of civil society efforts.
- Encourage the development and implementation of robust financial tracking systems for migration-focused CSOs to maintain transparent records, ensuring compliance with anti-money laundering and anti-terrorism financing regulations. By giving local organizations the tools and resources they need to navigate complex financial regulations, donors can reduce the risk of penalties while promoting good governance within the civil society sector.
- Ensure that anti-corruption measures are sensitive to the impact on local organizations and offer them the necessary resources to navigate this complex environment. Promoting

transparency and accountability at all levels of operation is crucial to safeguarding local CSOs' work.

- Include civil society representatives - such as members of the Turkish Refugee Council - in EU-Türkiye dialogues on migration governance and foreign policy to inform and shape decision-making.

*Security support:*

- Provide support to ensure migration-focused CSOs are covered by appropriate risk-sharing mechanisms, including safety and security insurance for staff and premises. This helps mitigate operational risks, particularly in 'high-risk' periods or areas where political tensions or anti-refugee campaigns escalate, that are often critical to donor priorities. Providing this coverage ensures the continued functioning of organizations working in challenging environments.
- Allocate specific funding to support security-related costs, crucial for CSOs operating in environments where anti-refugee sentiment frequently intensifies and/or particularly during election periods or public campaigns targeting migrants. This will help ensure that CSOs can operate safely in periods when access is difficult or dangerous, without diverting from their programmatic objectives.
- Encourage the creation of standardized security procedures for CSOs, including a compensation fund for staff in the event of security incidents, including abductions or other forms of harm. Donors should also prioritize a clear duty of care, ensuring that these organizations are not only funded but also supported in ensuring the safety of their staff.

**To UN agencies and (I)NGOs:**

- Collaborate more closely with local CSOs in programming areas related to migration. Local organizations provide crucial contextual knowledge, which can increase the relevance and impact of projects. Their involvement ensures programs are both effective and sustainable.
- Support mechanisms that allow smaller migration-focused CSOs to benefit from the networks, resources, and expertise of international organizations, while also ensuring that local organizations' leadership and capacity are recognized and reinforced. This creates a more balanced and mutually beneficial partnership where local actors can play a leading role in driving initiatives forward.
- Improve access to security-related information for local migration-focused CSOs, as international organizations often have more detailed and timely security assessments.

Link information-sharing systems to local CSOs to enhance their operational planning and safety measures.

- Ensure leadership of local CSOs: Promote the leadership and capacity of smaller migration-focused CSOs by ensuring their active involvement in decision-making processes. Recognize local organizations as central actors in driving migration-focused initiatives.
- Request a certain diversity to UN Agencies benefitting from EU/NL funding when it comes to support local CSOs, to avoid working with the same local partners and leaving other promising initiatives behind, especially in difficult-access areas of Türkiye.

## Future research

---

Under the 2023-2028 Migration and Displacement Grant Policy framework supported by the Dutch Ministry of Foreign Affairs, Upinion will continue monitoring the evolving operational environment of migration-focused CSOs in Türkiye, providing annual briefs to track progress, challenges, and emerging trends, offering valuable insights for informed decision-making and strategic support.<sup>68</sup>

Should you be interested in exploring more nuanced insights or discussing the operational environment and situation of CSOs working on topics such as LGBTQ+, climate change, women's empowerment, girls' education, democratic transition/governance, or any other relevant topics, we would be happy to engage in that conversation and explore potential research opportunities. Please feel free to reach out to [marouen@upinion.com](mailto:marouen@upinion.com).

---

<sup>68</sup>The same applies to Niger, Mali, and Libya—which are also Upinion's target countries under the 2023-2028 Migration and Displacement Grant Policy framework.

## Contact

Noor Lekkerkerker  
CEO  
[noor@upinion.com](mailto:noor@upinion.com)

Marouen Taleb  
Project Manager  
[marouen@upinion.com](mailto:marouen@upinion.com)

