

Bridging protection gaps: The critical role of NGOs in supporting refugee women in Turkey and Greece during the migration crisis

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ABSTRACT: The 2015 international migration crisis exposed significant gaps in protection concerning refugee women in frontline European countries, where gender-based violence, legal uncertainties, and integration barriers compound existing vulnerabilities, while state protection systems often prove inadequate. This qualitative study examines how non-governmental organisations (NGOs) address these gaps in Turkey and Greece. The findings reveal that Turkish NGOs primarily focus on direct service provision and integration support, reflecting the country’s role as a destination for established refugee populations, while Greek organisations emphasise legal advocacy and rights-based approaches in response to restrictive asylum policies and the country’s transit-oriented context. While NGOs provide essential support through innovative, gender-sensitive programming, their effectiveness is constrained by dependence on funding, political restrictions, and coordination challenges. The findings demonstrate that sustainable protection for refugee women requires systematic state investment and coordinated policy responses rather than continued reliance on humanitarian gap-filling. Even innovative NGO programs cannot compensate for fundamental policy failures and inadequate state protection systems.

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1. Introduction

The 2015 international migration crisis brought unprecedented numbers of refugees and asylum seekers to European borders, with Turkey and Greece serving as key frontline states. Among the millions who fled conflict and persecution, refugee women faced particular vulnerabilities, experiencing what scholars have termed ‘gendered displacement’ (Kurtoğlu et al. 2023). These women encountered not only the general challenges of forced migration but also gender-specific risks, including sexual and gender-based violence, economic exclusion, and healthcare barriers. While international legal frameworks provide formal protection rights, significant gaps emerged between policy commitments and implementation realities, affecting women’s access to essential services and protection from violence.

As state protection systems struggled to respond to the mass arrivals, non-governmental organisations increasingly stepped in to provide essential support (Ferris 2013), yet their effectiveness varied significantly across national contexts. Turkey and Greece represent critical comparative cases for examining these NGO responses. Turkey has the largest refugee population in the world under a Temporary Protection Regulation (Turkey, Council of Ministers 2014), positioning the country as a destination for established Syrian refugees rather than a transit point. Greece, conversely, serves as the main entry point to the European Union. It follows the EU’s hotspot approach, which focuses on border controls and asylum processing (Spathopoulou 2020). The 2016 EU-Turkey Statement changed Greece from a transit corridor to a containment zone (EU-Turkey Statement 2016). These different roles – Turkey as a long-term host and Greece as a transit and containment state – create unique environments that shape how NGOs conceptualise protection work and design their programs.

While existing research addresses refugee protection systems and acknowledges the roles of NGOs in humanitarian responses, limited comparative analysis examines how NGOs respond to protection gaps for refugee women across different national policy contexts. This study addresses this gap by examining how NGOs in Turkey and Greece responded to the protection needs of refugee women during the migration crisis, and comparing their approaches across these two distinct frontline contexts. The research is guided by two primary questions: (1) How do NGOs address gaps in protection for refugee women in Turkey versus Greece, and what accounts for the differences in their approaches? And (2) What

are the key constraints and enablers affecting NGO effectiveness in protecting refugee women's rights?

To answer these questions, this study employs a qualitative research design using semi-structured interviews with six NGO representatives (three from Turkey and three from Greece) who work directly with refugee women. Findings reveal distinct NGO approaches shaped by their operating environments. Turkish NGOs primarily focus on direct service provision and integration support, reflecting Turkey's role as a long-term destination. Greek NGOs emphasise legal advocacy and rights education, responding to Greece's restrictive asylum procedures and its role as a transit country. Both contexts reveal significant constraints on NGO effectiveness, including dependence on funding, political restrictions, and coordination challenges. Despite creative programming efforts, NGOs struggle to address systemic protection failures, highlighting how state-level policy choices and institutional capacity fundamentally shape protection outcomes for refugee women.

This study contributes to the literature on refugee protection by providing the first systematic comparison of NGO responses to women-specific protection gaps in Turkey and Greece, demonstrating how different migration management frameworks create distinct opportunities and constraints for civil society protection work. The findings challenge assumptions that NGO involvement can substitute for state protection obligations, revealing instead how NGO effectiveness depends critically on supportive policy environments, adequate resourcing, and coordinated approaches between state and non-state actors.

The article proceeds as follows: Section 2 reviews the literature on protection gaps, the gender dimensions of displacement, and NGO roles in refugee protection, establishing the conceptual framework and the research gap. Section 3 describes the qualitative methodology, including participant selection, data collection, and analysis procedures. Section 4 presents findings on NGO approaches, program strategies, and operational constraints in both countries. Section 5 discusses the implications for policy and practice, situating the findings within broader debates about state responsibility and the roles of civil society in refugee protection.

2. Literature review

2.1. Conceptualising protection gaps in refugee contexts

'Protection gaps' refers to the differences between the rights refugees have under international law and the protection they actually receive. The UNHCR's Protection Gaps Framework explains that these gaps arise from both states'

unwillingness to uphold the rights of refugees and asylum seekers, and from many states' inability to provide the required protection (UNHCR 2008: 1). This conceptualisation is critical because it distinguishes between political failures or unwillingness and capacity issues or inability. It acknowledges that protection gaps emerge from various, often related, sources.

The UNHCR framework organises protection analysis around eight core components: a favourable protection environment; registration and status determination; documentation; security from violence and exploitation; freedom of movement and legal remedies; basic needs and essential services; community participation and self-reliance; and opportunities for durable solutions (UNHCR 2008).

These dimensions provide a systematic lens for analysing where refugee protection systems fall short. Protection gaps arise when host states fail to fulfil their obligations under the 1951 Refugee Convention and its 1967 Protocol (UNHCR 2008). They can also arise when bureaucratic systems create obstacles to the exercise of rights. Additionally, gaps occur when institutions lack the capacity to provide the services they have promised (UNHCR 2008). Hathaway (2021) argued that the Refugee Convention's implementation is at risk due to a reliance on makeshift efforts and the unfair distribution of protection responsibilities.

Importantly, the framework highlights that protection gaps are specific to each context. They depend on national legal systems, administrative abilities, political commitment, available resources, and the extent of displacement (UNHCR 2008).

In frontline states that host large refugee populations, protection gaps often widen due to the combination of overwhelming numbers and limited resources. Putri et al. (2024) highlighted such protection gaps, including unequal burden-sharing among countries and limited access to asylum, noting that the inconsistent application of international law weakens refugees' access to essential rights. There is a consistent pattern of disconnect between broad policy goals and funded, detailed mechanisms for implementation.

Understanding protection gaps requires examining both formal legal rights and practical access to them. Refugees may have legal rights to healthcare, education, and legal protection, but they often face significant barriers to accessing these services (Joseph et al. 2020). These obstacles include language barriers, discriminatory practices, documentation requirements, geographic remoteness, and a lack of information. This implementation gap, the distance between policy and practice, is a major focus of protection analysis. It shows why formal rights provisions alone are not enough.

2.2. Gender dimensions of protection gaps

Protection gaps impact refugee women more than others because of overlapping vulnerabilities tied to gender, legal status, and displacement. While international frameworks increasingly acknowledge gender-based persecution and the specific protection needs of women, their implementation is still largely gender-blind (Freedman 2010; Grabska 2011; Killian and Olmsted 2023).

Gender-based violence (GBV) is one of the most serious signs of a protection gap for refugee women. Women experience higher risks of sexual and gender-based violence during displacement and in host countries (Karakosta and Riza 2020; Tastsoglou et al. 2021; Khouani et al. 2023).

However, protection systems systematically fail to prevent GBV or provide adequate support to survivors (Karakosta and Riza 2020; Tastsoglou et al. 2021). As this study's findings demonstrate, women face significant barriers to reporting, including fear of deportation and lack of documentation – challenges that intersect with inadequate institutional responses.

Economic exclusion constitutes another gendered protection gap. Displacement disrupts women's economic participation through limited mobility, limited access to employment, and increased family responsibilities (Gururaja 2000), resulting in persistent gender gaps in livelihoods and social protection (Ortiz and Klugman 2022).

Healthcare access reveals critical protection gaps for refugee women. Systemic weaknesses, including economic crises, worker shortages, and weak primary healthcare systems, make it difficult to meet refugee needs (Joseph et al. 2020).

These gender-specific protection gaps persist despite decades of policy commitments to gender mainstreaming in refugee protection. The disconnect between policy rhetoric and implementation realities suggests deep structural issues rather than simply technical challenges (Freedman 2010; Grabska 2011). Gender-sensitive programs often fail due to a lack of gender expertise, ingrained gender stereotypes, insufficient donor commitment, and time constraints (Killian and Olmsted 2023).

2.3. The role of NGOs in addressing protection gaps

Non-governmental organisations play a vital role in refugee protection systems, but their involvement involves unique challenges. Ferris (2013) noted that NGOs have a long history of assisting refugees and are increasingly involved in their protection. This increased involvement stems from the international community's failure to protect refugees and the growing role of NGOs in international issues.

NGOs provide direct services, including emergency assistance, healthcare, and education; engage in advocacy and policy influence; and step in when government support falls short (Naseh et al. 2021; Bonfert et al. 2022; Sunata and Tosun 2018).

However, NGO involvement creates significant challenges. Coordination issues lead to service gaps, with refugee responses falling short in key areas including education, healthcare, shelter, and livelihoods (Culbertson et al. 2016). Coordinating refugee assistance involves a significant process of ‘handing off’ responsibilities between different stakeholders over time, creating gaps in continuity as responsibilities shift from informal volunteers to local emergency relief groups, then to international NGOs, and ultimately to longer-term organisations (Martin 2025).

NGOs face substantial operational constraints, including limited funds, uncertain funding sources, and a lack of cooperation among organisations (Atar et al. 2022). This competition among NGOs leads to gaps in coverage and overlaps in services. These coordination problems reflect wider structural issues within the humanitarian system, not merely technical challenges.

Sunata and Tosun (2018) found that NGOs play a crucial role in helping refugees access their rights, integrate into society, and receive humanitarian support. The refugee crisis has opened up opportunities for active citizenship and new mobilisation in support of humanitarian and integration assistance. Faith-based motivations significantly influence the formation and continuation of NGOs’ activities, with refugee community organisations serving a unique integrative role outside of mainstream paths. Syrian-led organisations possess cultural understanding and community trust, which enable more effective support, although they also face the same funding uncertainties that threaten their sustainability.

Critically, while NGOs fill vital gaps in government support, playing a key role in meeting basic needs (Atar et al. 2022; Kourachanis 2024), their involvement raises fundamental questions about responsibility and accountability. Ferris (2013) questions whether providing services through NGOs allows states to avoid their protection responsibilities. The growing presence of NGOs reflects broader shifts in social policy, marked by the ‘NGOisation’ of services, often focused on addressing severe poverty (Kourachanis 2024). This creates a troubling dynamic: NGOs cannot and should not substitute for state protection obligations, yet their effectiveness in filling gaps may paradoxically enable states to avoid the necessary investment into protection infrastructure.

2.4. Turkey and Greece as comparative contexts

Turkey and Greece represent critical cases for examining NGO responses to refugee protection gaps due to their roles as frontline states in the 2015 migration

crisis, yet their fundamentally different positions within the European migration system create distinct protection challenges. Turkey hosts the world's largest refugee population, with over 3.6 million Syrians under the Temporary Protection Regulation since 2014 (Turkey, Council of Ministers 2014), positioning the country as a long-term destination for established Syrian refugees rather than a transit point. Greece, conversely, functions primarily as an EU entry point under the hotspot approach, which focuses on border controls and asylum processing (Spathopoulou 2020). The 2016 EU-Turkey Statement transformed Greece from a transit corridor to a containment zone where asylum seekers face prolonged uncertainty (EU-Turkey Statement 2016).

These various roles generate distinct legal and policy frameworks that shape protection gaps in different ways. Turkey's Temporary Protection Regulation provides legal status to Syrian refugees (Turkey, Council of Ministers 2014). However, refugees face challenges integrating and navigating bureaucratic systems to access services. The Work Permit Regulation requires employer-submitted applications, limits employment to designated sectors and geographic areas, and establishes employment quotas (Turkey, Work Permit Regulation for Temporary Protection 2016). These provisions create barriers to formal employment, particularly for refugee women who face additional gender-based discrimination in hiring.

Turkey's response has shifted from emergency measures to longer-term integration efforts (Secen and Gurbuz 2021), yet challenges persist, including funding limitations, coordination issues, and a lack of rights-based legal protection (Çelik and White 2021).

Greece's asylum system, governed by EU regulations and the hotspot approach, focuses on border controls and asylum processing rather than integration support (Spathopoulou 2020). Legislative reforms, including Law 4636/2019 and the current Asylum Code (Law 4939/2022), introduced accelerated inadmissibility procedures and geographic containment measures that restrict refugee mobility (Makrides 2022). Greece faces ongoing problems with overcrowding and poor facilities for refugees, including poor living conditions such as a lack of sanitation, insufficient accommodation, and limited access to healthcare (Papadimos et al. 2020; Bohnet and Rügger 2021).

These different roles – Turkey as a non-EU long-term host and Greece as an EU transit and containment state – create unique environments that shape how NGOs conceptualise protection work and design their programs. By comparing these contexts, we can examine how different policy frameworks, state-civil society relationships, and migration management methods affect NGO strategies and their ability to protect refugee women's rights.

Comparative studies have examined refugee protection and integration in Turkey and Greece alongside other countries. Amaral et al. (2018) compared refu-

gee policies and integration efforts in Turkey, Greece, Germany, the UK, Canada, and Australia, finding that integration success relies on strong civil society support, political will, and practical policies. Both Turkey and Greece lack the private sponsorship mechanisms and strong public support found in Canada and Australia, while facing heavier hosting burdens than distant resettlement countries. Crul et al. (2019) examined education policies for refugee children across Sweden, Germany, Greece, and Turkey, finding that immediate integration into regular classes produces better outcomes than segregated systems. However, these comparative studies examine Turkey and Greece among multiple cases and focus on state policies rather than specifically examining how NGOs address protection gaps for refugee women across these two distinct contexts.

2.5. Research gap

While substantial literature addresses refugee protection gaps (UNHCR 2008; Hathaway 2021), gender-specific vulnerabilities (Freedman 2010; Grabska 2011; Ortiz and Klugman, 2022), and NGO roles in humanitarian response (Ferris 2013; Atar et al. 2022; Sunata and Tosun 2018), critical gaps remain in understanding how NGOs specifically respond to protection gaps for refugee women across different national policy contexts. Prior research tends to examine these elements separately: studies of protection gaps often focus on state systems with limited attention to NGO responses, and NGO literature typically examines organisations in single-country contexts (Atar et al. 2022; Makrides 2022) rather than as comparative responses to structurally different protection environments. While comparative studies examine Turkey and Greece among multiple cases (Amaral et al. 2018; Crul et al. 2019), they focus on state policies and integration outcomes rather than specifically examining how NGOs address protection gaps for refugee women across these two contexts, which have fundamentally different migration management roles.

This article addresses this gap by examining how NGOs in Turkey and Greece responded to the protection needs of refugee women during the migration crisis and comparing their approaches across these two distinct frontline contexts.

3. Methodology

This article employs a qualitative research design, using semi-structured interviews with NGO representatives who work directly with refugee women in Turkey and Greece. Six participants were selected through purposive sampling: three from Turkey and three from Greece, representing local NGOs, interna-

tional organisations, and feminist advocacy groups. Selection criteria included direct work with refugee women, a minimum of five years of experience, and leadership roles (see Appendix A for interview details).

Interviews were conducted via Zoom in English, lasting 90-120 minutes each. The protocol covered organisational missions, challenges faced by refugee women, gender-based violence, service provision, culturally sensitive approaches, rights awareness, legal advocacy, and external contextual factors. Data analysis involved systematic qualitative content analysis with cross-case comparative methodology. Transcripts were coded using both deductive (protocol-based) and inductive (emergent) approaches to examine organisational missions, operational challenges, response strategies, resource constraints, and contextual factors. A comparative analysis identified how national policy environments shape organisational strategies for protecting refugee women.

The study received ethical approval and adhered to the principles of informed consent, confidentiality, and voluntary participation. Limitations include the small sample size and reliance on organisational perspectives rather than refugee women's direct perspectives.

4. Findings

As discussed in Section 2, Turkey's role as a long-term destination under Temporary Protection and Greece's role as an EU transit and containment zone create different working conditions for NGOs. Interviews with six NGO representatives reveal how these contexts shape protection strategies, program design, and the effectiveness of efforts to address protection gaps for refugee women.

4.1. Organisational approaches to protection gaps

The analysis of NGO interviews shows clear differences driven by Turkey's and Greece's unique positions in the European migration system. Although all organisations focus on addressing protection gaps for refugee women, their strategies differ considerably. This difference lies in their focus on integration or advocacy. These approaches reflect structural differences in legal frameworks and migration management roles, not just organisational preferences.

Turkish NGOs prioritise direct service provision and integration support, addressing protection gaps in basic needs, essential services, and community participation (UNHCR 2008).

This approach responds directly to Turkey's role as a long-term destination, hosting over 3.6 million Syrians under the Temporary Protection Regulation. As P1 explained, 'Our organisation's mission is to support refugee women by providing them with essential tools, skills, and knowledge to navigate their new life in the host country. We focus on empowerment and ensuring they have access to basic rights and services.' The emphasis on 'navigating' and 'new life' signals an expectation of permanence, positioning Turkey as a settlement destination rather than a transit point. P3 elaborated on this comprehensive service approach: 'Our organisation is committed to ensuring that refugee women have access to gender-sensitive services and programs that can address their unique needs, including legal aid, mental health support, and community integration.'

This integration-focused strategy directly addresses protection gaps created by the Temporary Protection Regulation. The regulation provides legal status (Turkey, Council of Ministers 2014) but creates integration challenges as refugees navigate bureaucratic systems to access services. Turkish NGOs thus fill gaps in basic needs and essential services (UNHCR framework dimensions) where state capacity is inadequate to meet the scale of the refugee population.

Greek NGOs emphasise legal advocacy and rights-based education, targeting protection gaps in legal remedies, security from violence, and status determination. This approach reflects Greece's restrictive asylum procedures and role as an EU entry point under the hotspot approach. P4 articulated this strategy clearly: 'Our mission revolves around knowledge, community, and empowerment, in that order. We provide the knowledge they need to empower them to become effective members of the community.' The prioritisation of knowledge reflects the complex legal environment refugee women navigate in Greece, where understanding asylum procedures proves critical for protection and potential mobility within Europe. P5 reinforced this rights-centred approach: 'Our organisation's mission is to support women in need, especially refugee women, by focusing on their rights, self-care, and creating a community for them to feel part of.' This advocacy orientation responds to protection gaps created by Greece's accelerated inadmissibility procedures and geographic containment measures introduced through Laws 4636/2019 and 4939/2022 (Makrides 2022), which make legal status determination the primary barrier to accessing other rights.

These different approaches arise from basic structural differences in legal systems and state capacity, not from organisational choices. Turkey's Temporary Protection Regulation creates integration challenges, including bureaucratic complexity in accessing services, employment barriers due to strict work permit requirements, and documentation obstacles. NGOs tackle these issues through capacity-building and direct service provision. Greek NGOs face a different set of protection gaps, including prolonged legal uncertainty due to asylum processing delays, geographic restrictions that limit mobility and access, and poor

reception conditions that worsen vulnerabilities. The legal and political context determines whether NGOs focus on helping integration in Turkey or challenging restrictive procedures in Greece.

This distinction is clear in program design. Turkish organisations provide Turkish-language courses and entrepreneurship training to support long-term economic integration. They directly address gaps in self-reliance and community participation. Greek organisations focus on legal aid clinics and multilingual rights information, including Arabic, Farsi, French, and English, as P4 noted. They help women navigate asylum procedures and prepare for potential movement within Europe. This targets gaps in legal remedies and status determination. While Turkish NGOs also engage in rights advocacy, and Greek NGOs provide direct services, their resource allocation patterns differ. Turkish NGOs primarily allocate resources to integration programs, while Greek NGOs focus on legal advocacy and procedural support.

However, a critical paradox arises from this analysis. While NGOs show remarkable creativity in addressing context-specific protection gaps, their effectiveness may unintentionally enable the state to underinvest in protection infrastructure. In Turkey, NGO services fill gaps left by temporary protection status, but do not provide integration pathways, which may legitimise the state's failure to meet long-term integration obligations. In Greece, NGOs in reception facilities ensure minimal humanitarian standards while refugees stay in legal limbo due to containment policies, an approach that supports EU border management goals without fixing systematic rights violations. This situation echoes Ferris' (2013) concern that NGO services let states sidestep their protection duties. Instead of enhancing state protection systems, NGOs replace them, yet they lack the authority or resources to provide sustainable, rights-based protection. The interviews show that NGO representatives recognise this tension but find it impossible to resolve without major policy changes that address both the unwillingness and the inability aspects of the protection gaps identified in the UNHCR framework (2008).

4.2. Protection gaps in practice: GBV, healthcare, and legal status

NGOs address three important protection gaps that affect refugee women: gender-based violence, access to healthcare, and legal status uncertainties. Organisations create programs focused on gender issues to tackle these problems. However, they face ongoing challenges that limit their effectiveness in Turkey and Greece.

Gender-based violence prevention and response emerged as the core focus across all interviewed organisations, reflecting both GBV prevalence and system-

atic state protection system failures. The widespread nature of violence creates a climate of fear, impacting women's willingness to seek help. P1 noted: 'Many refugee women experience gender-based violence, which is often overlooked or misunderstood', indicating both the prevalence of GBV and the inadequate protection responses. The geographic spread of risk further complicates protection. P2 described this pervasive threat: 'Refugee women are often targets of violence both within refugee camps and in the communities they are trying to integrate into.' When violence occurs across multiple settings, this undermines the concept of traditional 'safe spaces'. Legal vulnerability creates additional reporting barriers. P1 observed: 'Many refugee women are subjected to gender-based violence but are afraid to report it due to fear of deportation, particularly if they lack proper documentation.' This intersection of legal precarity and GBV produces what participants termed a 'double silencing' effect, where women face violence but cannot access protection mechanisms without risking deportation.

NGOs develop comprehensive approaches that combine prevention education with survivor support services. P1 explained their dual-focused programming: 'One of our key programs is focused on gender-based violence prevention. We educate both refugee women and the broader community about GBV and how to prevent it, while also providing support to survivors of violence.' This strategy addresses protection gaps in security that emerge due to violence and exploitation through both community-level prevention and individual-level response. The emphasis on community education reflects NGOs' recognition that GBV requires collective solutions that target social norms rather than solely individual interventions, such as supporting survivors' demands, prioritising trauma-informed approaches that prioritise safety, and making appropriate referrals. P6 emphasised referral quality: 'We ensure that survivors of GBV are referred to safe spaces and healthcare providers who are sensitive to their specific needs, especially regarding their mental health.' This focus acknowledges that insensitive responses can re-traumatise survivors, highlighting the specialised nature of effective GBV programming.

Beyond responding to GBV, Turkish NGOs employ varied approaches to gender-sensitive programming, including applying protection-focused and family-based models, as well as solidarity approaches that directly challenge gender inequality (Keysan and Şentürk 2021). Yet these efforts face internal constraints, including limited gender expertise, ingrained stereotypes, and time constraints that affect program effectiveness (Killian and Olmsted 2023). Greek NGOs similarly provide gender-sensitive services but face resource constraints and lack sufficient institutional influence to address systemic risks. Refugee women continue experiencing high levels of GBV not only in camps but throughout asylum processes and daily life, stemming from inadequate living conditions and limited institutional support (Tastsoglou et al. 2021). Programs frequently fail to

address the complex, intersecting factors that create vulnerability to violence (Karakosta and Riza 2020).

Healthcare access gaps demonstrate how formal rights fail to translate into actual access through overlapping barriers. While refugee women possess healthcare rights in both countries, P1 explained the practical realities: 'Refugee women often face limited access to basic services like healthcare and shelter.' Systemic barriers, combined with communication and cultural issues, affect care quality, even when services technically exist. P4 identified language as a critical issue: 'Without the ability to communicate properly, refugee women are excluded from basic services, including healthcare and legal support.' Communication barriers prove especially serious for reproductive health and maternal care, which require cultural sensitivity and clear communication for effective treatment.

Mental health services face particularly severe capacity constraints due to the high level of trauma among refugee populations and the specialised nature of the required psychological support. P3 described this gap: 'The demand for mental health support far exceeds the available services. There are just not enough resources to meet the needs of women who are experiencing emotional and psychological distress after fleeing conflict.' This gap proves particularly concerning as psychological trauma impacts refugee women's ability to access other services and participate in integration processes. NGOs respond with varied forms of psychosocial programs. P1 described comprehensive support: 'One of our main programs is focused on providing psychosocial support for refugee women, including therapy sessions, group support, and mental health workshops. This program aims to address the trauma many women face.' Greek organisations have developed innovative approaches that combine creative therapies and address resource limitations and cultural preferences. P5 explained: 'We have a team of psychologists who provide group therapy, using drama therapy, music, and movement to build trust and provide psychological support to refugee women.' These methods address language and cultural barriers in traditional therapy, yet cannot substitute for an adequate state mental health infrastructure.

Legal status uncertainty creates cascading protection gaps across all dimensions. Unstable legal status impacts access to basic services and crime reporting. P1 explained: 'Without proper documentation, many refugee women can't access the full range of services they need, including healthcare, legal assistance, and even housing.' This documentation gap is particularly severe in Greece, where prolonged asylum procedures create prolonged legal limbo. P4 noted the temporal dimensions: 'The asylum process takes a lot of time. It can take years to get the first or second interview, and during this period, mothers often don't have any legal documentation.' This ongoing uncertainty limits immediate access to

services and prevents women from making long-term plans or investments in their integration.

NGOs provide legal aid operating at multiple levels, from supporting individual cases to advocating for policy changes. P2 described direct assistance: 'We offer legal guidance and support to women who need assistance in navigating the asylum process, making sure they understand their rights and how to claim them.' This rights education approach reflects the complexity of asylum and immigration systems, which require specialised knowledge to navigate effectively. Several organisations engage in policy advocacy beyond individual cases. P6 explained their advocacy approach: 'We actively participate in policy advocacy to improve the legal framework for refugee women. We highlight the gaps in the system and advocate for better access to justice for them.' This dual approach reflects the recognition of NGOs that sustainable protection requires both immediate assistance and structural policy changes.

These patterns reveal a critical tension: while NGOs demonstrate creativity in gender-sensitive programming, their efforts cannot compensate for fundamental and systemic failures in gender-blind policy implementation. The persistence of gender-based violence, economic exclusion, and legal precarity despite NGO interventions confirms claims of institutional resistance to gender mainstreaming identified in the literature (Freedman 2010; Grabska 2011).

NGO programs offer protection for some women, but they cannot tackle the structural issues like inadequate reception facilities, gender-blind asylum procedures, and a lack of state funding for specialised GBV services. Innovative programming cannot replace the necessary policy changes that address both the unwillingness and inability to fill protection gaps. Gender-sensitive work by NGOs operates within structural limits that significantly limit protection outcomes, regardless of how innovative or dedicated the organisations are.

4.3. Constraints on NGO effectiveness

Despite their important role in addressing protection gaps, NGOs in both Turkey and Greece face structural constraints that limit their ability to provide sustainable protection for refugee women. These barriers exist at financial, political, and operational levels. They show how protection gaps reflect not just the states' inability, but also their unwillingness to invest enough in refugee protection infrastructure.

Resource scarcity emerged as the main constraint across all parts of NGO operations, yet it reflects deeper structural issues in humanitarian financing rather than mere resource limitations. Participants described this as a constant conflict between ambitious programming goals and the available funding. This

financial limitation manifests not only in resource constraints but also in the unpredictable, short-term nature of funding cycles, which hinders sustainable program development. P1 reported on the direct effect of resource limitations on protection outcomes: 'One of the major gaps in protection is that not all women can access the services they need. There's a lack of resources and shelter spaces, which leaves many women without options.' This resource gap forces organisations to make tough choices about which women to serve and which needs to prioritise. They end up rationing protection based on available funds rather than on thorough assessments of need, a practice that fundamentally contradicts humanitarian principles grounded in need. The uncertainty of funding over time exacerbates these challenges. It impedes long-term planning and the building of sustainable relationships with refugee communities. P3 explained how unpredictable funding lessens program effectiveness: 'International aid is often unreliable, and fluctuating donor priorities mean that sometimes, crucial programs for refugee women are not fully funded, leaving gaps in support.' This funding volatility reveals a critical tension: humanitarian financing follows media coverage and political priorities rather than ongoing protection needs, creating resource cycles that seldom align with the enduring challenges of refugee protection. This pattern demonstrates how protection gaps stem from political unwillingness to commit sustained resources rather than genuine resource scarcity in wealthy host countries.

Greece's economic context illustrates how national crises compound protection challenges by reducing resources and increasing social tensions. Greece's long-standing economic troubles have created direct competition between local social needs and refugee protection for scarce public funds. P5 explained the real effects: 'Funding for refugee programs is continuously shrinking. Greece is facing an economic crisis, and as a result, less financial support is available for refugees. This significantly limits the services we can provide to those in need.' This situation is concerning. Economic hardship increases social tensions and anti-refugee sentiments while also reducing the resources needed to protect refugees and support their integration. This lack of support may exacerbate tensions. It shows how economic limitations create cycles of exclusion. NGO programs alone cannot break these cycles without changes in state-level economic policies.

Political and legal restrictions represent a second major constraint that has intensified over time, reflecting a shift in governmental priorities from humanitarian protection to border control and deterrence. These restrictions operate through multiple mechanisms, from direct limits on NGO access to refugee communities to wider policies that make protection work harder and sometimes riskier. Participants noted increased operational restrictions as governments reacted to strengthening anti-refugee sentiment by limiting humanitar-

ian access and support. P3 identified this broader political shift: 'The political climate is becoming more anti-refugee, which directly impacts the protection policies in place for women. Governments are tightening their borders and making it harder for refugees to stay or access services.' This political hardening creates ripple effects beyond immigration policy, affecting NGO operations, funding environments, and public support for refugee protection. In Greece, political restrictions manifest as access limitations that fundamentally undermine service delivery to the most vulnerable populations. P5 discussed the practical impact: 'Our access to refugee camps is highly restricted by the government. Only a few organisations are granted permission to enter, which makes it difficult for us to reach and provide assistance to those who are most vulnerable.' These access restrictions create a troubling paradox. The most isolated and vulnerable refugee women, those in camps and detention facilities, are the populations that NGOs find hardest to reach. This challenges the humanitarian principle of prioritising the most vulnerable. It shows how political restrictions transform protection gaps associated with implementation challenges into deliberate policy choices.

These patterns of constraints indicate a major contradiction in refugee protection today. States depend on NGOs to fill gaps in protection, but they also limit NGOs' effectiveness through unstable funding and political barriers. This situation highlights the unwillingness aspect of protection gaps that is noted in the UNHCR framework. Constraints on NGO effectiveness do not arise from technical or capacity issues; instead, they come from political decisions about resource allocation and humanitarian access. The mix of unstable funding, economic pressures, and political restrictions creates conditions in which even well-designed, professional organisations struggle to achieve meaningful protection outcomes at scale. More importantly, these constraints show that NGO involvement cannot replace the state's responsibility for protection. When organisations lack financial stability, face intentional limits on access, and operate at scales too small to meet demand, they cannot fill the gaps. The ongoing nature of these constraints, despite many years of NGO experience, indicates that we need political solutions. These solutions should address the states' unwillingness rather than focusing solely on technical improvements in NGO programs.

4.4. NGO-state relationships and the substitution paradox

The analysis of NGO operations shows that the relationships with state authorities in Turkey and Greece are fundamentally different. However, both countries share a concerning dynamic. The effectiveness of NGOs in addressing protection gaps may unintentionally enable the state to invest less in protection infra-

structure. This paradox operates differently in each context, influenced by the unique migration management systems and the limits of state capacity.

In Turkey, NGOs play a crucial role in addressing gaps where state systems are insufficient for the large refugee population. Turkish organisations offer direct services such as language training, entrepreneurship programs, and mental health support. These services help refugees navigate bureaucratic systems to access rights that are theoretically guaranteed under the Temporary Protection Regulation. While these services meet immediate needs, they may also reinforce temporary protection status without allowing for integration pathways. This situation enables the state to sidestep long-term integration responsibilities. The relationship between NGOs and the state is mostly cooperative in discussion but, in practice, replaces state responsibilities. NGOs provide services that the government should deliver under international protection obligations, but they do not have the power to tackle the policy frameworks that create gaps in protection. Political restrictions further limit this relationship. P3 identified the political climate shift: 'The political climate is becoming more anti-refugee, which directly impacts the protection policies in place for women. Governments are tightening their borders and making it harder for refugees to stay or access services.' This hardening limits NGO advocacy space while simultaneously increasing state reliance on NGO service delivery.

In Greece, NGOs have a more adversarial relationship with state authorities. They challenge restrictive policies while offering crucial services that support migration management focused on containment. Greek organisations highlight legal advocacy and rights education, addressing systematic obstacles in asylum processes and reception conditions. However, this advocacy takes place under significant access limitations. P5 described some of the practical limitations: 'Our access to refugee camps is highly restricted by the government. Only a few organisations are granted permission to enter, which makes it difficult for us to reach and provide assistance to those who are most vulnerable.' NGOs in camps and reception facilities help maintain basic humanitarian standards while refugees stay in a state of legal uncertainty. This supports EU border management goals but does not fix ongoing rights violations. Organisations see this issue but cannot resolve it without major policy changes that address legal frameworks and reception infrastructure.

This situation reveals a key contradiction: states depend on NGOs to address protection gaps while simultaneously limiting their ability to do so effectively. They do this through inconsistent funding, access-related issues, and political pressure. NGO participants recognised this problem but felt they could not change it without new policies from the state. The ongoing protection gaps, despite significant NGO efforts, highlight that civil society cannot replace the state's protection duties. Instead of working alongside state systems, NGOs act

as temporary solutions. This situation paradoxically allows the state to continue underinvesting in protection services. These findings question the claims in humanitarian literature about how NGOs and states work together. Instead, they reveal a pattern: the presence of NGOs allows states to neglect their protection duties while appearing to respond to humanitarian needs.

Table 1. Comparative NGO Responses to Protection Gaps – Turkey vs Greece

Dimension	Turkish NGOs	Greek NGOs
Primary Approach	<ul style="list-style-type: none"> • Integration and service delivery • Long-term settlement focus • Capacity-building emphasis 	<ul style="list-style-type: none"> • Rights-based advocacy • Legal empowerment focus • Knowledge and rights education
Protection Gaps Addressed	<ul style="list-style-type: none"> • Basic needs and essential services • Community participation • Self-reliance and integration 	<ul style="list-style-type: none"> • Legal remedies • Security from violence • Status determination
Key Programs	<ul style="list-style-type: none"> • Turkish-language courses • Entrepreneurship training • Mental health support 	<ul style="list-style-type: none"> • Legal aid clinics • Multilingual rights info • Asylum application support • Creative therapies
GBV Response	<ul style="list-style-type: none"> • Community prevention education • Survivor support services • Trauma-informed care 	<ul style="list-style-type: none"> • Safe space referrals • Legal support for survivors • Trauma-informed referrals
Healthcare Support	<ul style="list-style-type: none"> • Direct service provision • Psychosocial programs • Health navigation support 	<ul style="list-style-type: none"> • Creative therapies (drama, music) • Advocacy for state access • Navigation support
Legal Status Support	<ul style="list-style-type: none"> • TPR registration support • Work permit assistance • Documentation help 	<ul style="list-style-type: none"> • Asylum legal aid • Rights education • Policy advocacy
Main Barriers	<ul style="list-style-type: none"> • Funding volatility • Political restrictions • Resource scarcity • Bureaucratic complexity 	<ul style="list-style-type: none"> • Camp access restrictions • Economic crisis impact • Prolonged asylum delays • Funding shrinkage
State Relationship	<ul style="list-style-type: none"> • Gap-filling role • Substitutive in practice • Constrained advocacy space 	<ul style="list-style-type: none"> • Adversarial relationship • Severe access limits • Challenge restrictive policies
Critical Paradox	Effectiveness enables state underinvestment; legitimises temporary protection without integration	NGO presence facilitates containment while maintaining minimal standards; this cannot be resolved without policy changes

Source: author, based on semi-structured interviews with six NGO representatives (three from Turkey, three from Greece).

5. Discussion and conclusion

This study has examined how NGOs address protection gaps for refugee women in Turkey and Greece, revealing a fundamental paradox: NGOs' effectiveness in filling gaps created by state failures may inadvertently perpetuate state underinvestment in protection infrastructure, highlighting the importance of the ecosystem links that NGOs' agency is embedded in (Marton 2024: 21-22; 33-34), with relevance to some of the central issues on the agenda of this special issue. The boundary between political and domain-specific agency may be blurred at times, yet, as the above observation shows, even neutral forms of service provision may take on political significance in unintended and unexpected ways.

This finding is also significant in that it extends the UNHCR Protection Gaps Framework's dimensions of unwillingness and inability, demonstrating that protection gaps in frontline states reflect not capacity constraints but deliberate political choices about resource allocation and humanitarian responsibility.

In Turkey, NGOs provide services that legitimise temporary protection but do not offer integration pathways. This allows the state to avoid its long-term responsibilities while maintaining an appearance of humanitarian response. In Greece, NGOs in camps help maintain basic standards while refugees remain in legal uncertainty. This approach supports EU border management while failing to address ongoing rights violations. This substitution dynamic shows that current refugee protection often depends on civil society stepping in to fill gaps. Ironically, this can perpetuate the very gaps it aims to fix. It highlights how political and legal contexts limit organisational effectiveness, regardless of capacity or creativity.

The comparative analysis highlights three surprising patterns that answer the study's main questions about NGO effectiveness in refugee protection. First, contrary to the belief that a programmatic approach determines effectiveness, Turkish NGOs' focus on service delivery and Greek NGOs' rights-based advocacy have achieved similarly limited results in addressing key protection gaps. Both contexts feature innovative programming, including entrepreneurship training and Turkish-language courses in Turkey, as well as legal aid clinics and multilingual rights education in Greece. However, neither approach has succeeded in providing sustainable protection. This indicates that structural factors, such as state policy frameworks, funding volatility, and political restrictions, shape protection outcomes regardless of the organisational approach.

Second, examining the limits of NGO effectiveness shows that coordination challenges are symptoms, not causes, of protection gaps. Humanitarian discussions often highlight coordination failures as major problems. However, even well-coordinated NGO responses cannot compensate for weak state infrastructure, strict legal frameworks, and hostile political environments. This changes

the view of NGO constraints from operational issues that can be fixed with technical solutions to political questions about state unwillingness that need advocacy and policy change.

Third, examining gender-specific protection gaps shows that gender-sensitive programming is important but insufficient within gender-blind policy frameworks. NGOs offer trauma-informed GBV services, women-centred mental health programs, and gender-responsive legal aid. Still, women face high levels of violence, economic exclusion, and legal insecurity. This is because reception systems, asylum procedures, and employment regulations do not address gender-specific vulnerabilities.

These findings have significant theoretical implications for the Protection Gaps Framework outlined in Section 2. Applying the framework's analytical lens to NGO responses reveals that the unwillingness dimension—states' unwillingness to uphold refugee rights—predominantly shapes protection outcomes, rather than the inability dimension (UNHCR 2008). Protection gaps persist not because states lack resources or ability, but because political priorities emphasise deterrence and containment rather than rights-based protection. This reluctance manifests in funding instability, which hinders sustainable programs; political restrictions that limit humanitarian access; and policy frameworks that maintain legal uncertainties. The finding that NGO effectiveness largely depends on state political choices rather than organisational factors deepens our understanding of civil society's roles in humanitarian settings. Instead of acting as independent entities that fill gaps with technical skills, NGOs operate within political systems that demand their services while also limiting their effectiveness. This builds on Ferris' (2013) analysis, which shows that NGO involvement allows states to evade their protection responsibilities, demonstrating that substitution occurs through structural dynamics in which the presence of NGOs legitimises inadequate state systems.

Turkey's Temporary Protection Regulation and Greece's hotspot approach create different operating environments. However, both result in similar substitution dynamics. In these cases, NGOs help the state avoid its duty of protection. This suggests that critiques of 'NGOisation' (Kourachanis 2024) are particularly relevant to refugee protection. Civil society is increasingly filling in for state systems. The framework's focus on specific context factors is crucial (UNHCR, 2008): Political commitment plays a key role in whether other factors support or limit protection, regardless of NGO innovation.

Beyond these cases, the findings likely apply to frontline states that are dealing with large-scale displacement under strict frameworks. The substitution paradox may shape NGO-state relationships when governments maintain weak protection standards through civil society involvement but do not invest in durable infrastructure. Similar patterns likely exist in other EU frontline states that are

using hotspot approaches, in Middle Eastern countries hosting refugees under temporary protection schemes, and in transit countries managing displacement tied to external border control. The idea that the programmatic approach is less important than the structural context implies that discussions about the best NGO strategies may overlook crucial questions about state protection duties and political will.

The comparative analysis of interviews across different contexts in migration management systems reveals consistent patterns. Single-country studies often link these patterns to local factors. This highlights the importance of examining how various frameworks influence civil society roles and protection outcomes.

These findings suggest several policy priorities. First, host governments must go beyond gender-neutral frameworks to explicitly address refugee women's specific vulnerabilities in asylum and integration policies. This requires moving beyond civil society gap-filling toward systematic investment in protection infrastructure, providing multi-year operational funding rather than relying on volatile humanitarian aid, and ensuring humanitarian access rather than restricting NGO operations while expecting them to provide services. Second, international donors should make multi-year funding commitments to support sustainable programs rather than short-term emergency responses. Additionally, donors should support advocacy alongside service delivery and condition funding on state protection commitments, rather than accepting civil society as a substitute for state obligations. Third, coordination mechanisms should prioritise systemic advocacy over operational collaboration, recognising that improvements in coordination cannot compensate for inadequate state infrastructure and political restrictions. At the international level, accountability mechanisms must address state unwillingness to fulfil protection obligations rather than accepting NGO gap-filling as a sufficient response. The EU's reliance on frontline states to contain refugees while underfunding protection systems creates conditions in which the NGO presence masks systemic failures, suggesting the need for burden-sharing arrangements that incentivise adequate state protection.

Despite limitations such as an organisational focus rather than a beneficiary perspective, a small sample size, and a cross-sectional design, this research shows that sustainable protection for refugee women requires not only NGO innovation but also significant shifts in political will among states and in international protection frameworks. The ongoing protection gaps, despite extensive NGO programs, gender-sensitive approaches, and organisational changes, indicate that civil society cannot replace state protection duties. While NGOs play a crucial role in offering important services and advocacy, their success heavily relies on supportive policy environments, sufficient state infrastructure, and political commitments to rights-based protection.

Future research should include beneficiaries' voices through participatory methods. It should also involve broader studies across different contexts and a long-term analysis of how NGO-state relationships change. This approach would improve our understanding of the effectiveness of protection. Protecting refugee women's rights requires more than just a humanitarian response. It needs ongoing political involvement, policy reforms that acknowledge gender-specific vulnerabilities, and international cooperation. This cooperation must ensure that protection duties are fulfilled rather than passed on to underfunded civil society groups that face political constraints. The experiences documented here show that real progress requires confronting the political situations that create protection gaps. At the same time, NGOs cannot be expected to fill those gaps. This research highlights this expectation as both unreasonable and unfair.

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Appendix A. Interview Details

ID	Country	Organisation Type	Focus Area	Years Active	Role of the Participant
P1	Turkey	Local NGO	Refugee assistance, integration	10+ years	Social Welfare Director
P2	Turkey	Feminist NGO	Women's rights, GBV prevention	35 years	Social Worker and Researcher
P3	Turkey	Migrant Rights NGO	Empowerment	7 years	Lawyer
P4	Greece	International NGO	Maternal health	50+ years	Operations Manager
P5	Greece	Local NGOs	Integration, empowerment	11 years	Social Worker
P6	Greece	Women's NGO	Gender equality, GBV	36 years	Project Manager