Reforms of the migration management institutions: Comparison of the Hungarian and Turkish cases

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The study presents a comparative analysis of migration management reforms in Hungary and the Republic of Turkey. It aims at serving as a contribution to determination of the role of the state in migration theories by examining that how the state promote or restrict migration and tries to be efficient in handling migration issues. The study reveals the reforms took place in the last decade in migration institutional systems of two, mainly transit countries: Hungary and the Republic of Turkey. Beside Hungary, Turkey was chosen for comparison, since the efficacy of Turkish migration management system has strategic importance for the European Union.

Keywords: migration management, state, law enforcement, aliens' policing, refugees, Hungary, Turkey

I.   Introduction

In the globalized world, states have to respond to adverse impacts of wicked issues like, among others, international migration. Due to those challenges, the public administration gets more complicated, since problems overreach the national governmental structures and break through national borders. For handling those transnational issues, therefore, new forms of global governance are needed, which are able to tackle complex problems in global and holistic ways.[2] In certain cases, the national regulation and management of migratory processes are resulted in effects overreaching regions. This is the reason why the Turkish migration strategy, the function of migration management system and its effectiveness is timely and has priority. Its direct impact on migration flow towards the European Union was verified by the migration crisis in 2015. The realization of Hungarian and Turkish migration strategy is appearing in creation of the institutional background, too.

With the view to the conceptualization of the topic, it is important to note that Douglas S. Massey has defined that among migration theories „a missing element is the state".[3] In international migration management the role of the nation state has been increased since the 1970s and it has become the key actor recently. Concerning the securitization of migration, it is a priority how the state handles migration. As the state is responsible for the elaboration and implementation of migration policy, consequently, the ability of the state to enforce specific national policies is an additional consideration in connection with migration theories.[4]

It is obvious today, that due to the complexity of international migration the migration theories and models do not give adequate answers to processes.[5] Massey argues that state capacity varies along "the efficiency of the nation's bureaucracy, the strength of constitutionally embedded

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[2] Anthony Giddens, *Szociológia* [Sociology] (Második kiadás. Budapest, Osiris Kiadó, 2008), 56.

[3] Douglas S Massey, 'A Missing Element in Migration Theories', *Migration Letters* 12, no 3 (2015), 279-299. 281.

[4] Massey, 'A Missing Element in Migration Theories', 281.

[5] Gunnar Malmerg, 'Time and Space in International Migration', in *International Migration, Immobility and Development. Multidisciplinary Perspectives*, eds. by Hammar et al (Oxford, Berg, 1997), 21-48.

rights, the degree of judicial independence in enforcing those rates, and the relative demand for entry the country and the strength of its tradition of immigration".[6]

In the scope of this study, public administrative reform means such changes in principles, organization, structures, methods or procedures that aim at improving public administrative process.[7] The migration management system is a complex task and organization system.[8] Changes in migration institutional systems of nation states are in connection with the situation of global and European migration governance.

II.   Method

The study focuses on how the migration management function searches for its place. It reveals the reforms took place in the last decades in migration institutional systems of Hungary and the Republic of Turkey. The basis of the comparative analysis is that both countries are considered not only as source and target but as transit countries.

For studying the complex phenomenon of migration, Turkey gives a specific case study, since she faces different migratory flows than European countries. Therefore, Turkish experiences may be useful for other countries, as well.[9]

Qualitative research strategy is used for the examination, by text analysis it is a proper method to search the causes and nexus of problems. The study has a revealing and comparing character with institutionalist aspect. In the case studies the examination of the migration management systems is based on Hungarian, Turkish and international literature as seconder sources.

The study examines the background of Hungary and Turkey from the following aspects:
1) geographical location and historical background;
2) the evolution of the complex migratory institutional system, which includes the policy transfer and Europeanization.

The study points out only the most important milestones which had impact on migration management.

III.   Comparative analysis

The evolvement and development of aliens' policing show that the aliens' policing regulation is in close connection with societal, economic, political relations and contribute to the realization of general political and policy goals of a country.[10] The nexus of modern public administration and migration as governmental task arises at regulation and migration management level. The regulation of emigration, immigration and the societal, political integration of foreigners is an important part of the migration policy of a state. It is embedded into the societal, economic, international goals and state tasks. Government has to consider the specific geographical and geo-strategical status of the country when it elaborates its strategy on

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[6] Massey, 'A Missing Element in Migration Theories', 284.

[7] Gellén Márton, *Állam és közigazgatás új szerepben: Közigazgatási reformok és az állam szerepváltozásai* [State and Public Administration in New Role: Public Administrative Reforms and the Changing Roles of the State], (Budapest, Nemzeti Közszolgálati Egyetem, 2013), 25.

[8] Végh Zsuzsanna, 'Változások a migrációs igazgatásban Magyarországon' [Changes in the Migration Management in Hungary], in *Az idegenrendészeti intézményrendszer átalakulásának tapasztalatai Magyarországon és kitekintés az intézmény and the rendszer változásaira az Európai Unióban*, Teke András (szerk.), (Magyar Rendészettudományi Társaság Migrációs Tagozata Budapest, 2019. szeptember 17-18.), 65-78. 65.

[9] Juliette Tolay, 'Discovering Immigration into Turkey: The Emergence of a Dynamic Field' *International Migration,* 53, no 6 *(*2012), 57-73. 67.

[10] Nyárádi László, *Az idegenrendészet és a migráció kialakulása a magyar politikában* [Evolution of the Aliens' Policing and Migration in the Hungarian Politics], (ORFK OKK. Budapest, 1995), 9.

the entry, exit, residence and integration of foreigners, as well as, the sanctions in the case of violation of rules with the view to the specific geo-strategic situation of the state. Nevertheless, proper regulatory, implementation, management, budgetary and coordination conditions have to be provided.[11]

A   *Geographical location and historical background*

Hungary

Hungary is situated in Central Eastern Europe. From irregular migration point of view, the Balkan route has determining role, which made Hungary a transit country for the migrant flows towards Western Europe.

Various historical periods and events influenced the institutional background of migration management. In the mirror of historical events the waves of closure and efforts for opening the country from the 1880s last till today. The dynamics of Hungarian capitalist development, the number of immigrants increased but the first Word War limited the migration. On the one hand, after 1919, there was obvious limitation of the entry of foreigners, on the other hand, after the second Word War, during the socialist legal and institutional system strict control prevailed. At that time, refugees flows started to appear. At the end of the 1950s the tourism started to increase, which reached millions in number by the second half of the1960s. Since 1957, Hungary tried to develop international relation and tourism under the idea of opening. From the end of the second Word War until 1987 refugee affairs institution did not exist, reception of the refugees took place on ideological base.[12]

Political changes in Hungary and in the region during 1989 and 1990 were also resulted in opening. After 1987, Hungary transformed from refugee source country to receiving, target and transit country. At that time the globalizing processes and the frequency of regional conflicts launched new, and till the 1990s, increasing migratory flows. Those processes were connected to the increase of travel opportunities among countries and regions. Due to the former Yugoslavian crisis the number of asylum-seekers dramatically increased: from 100 000 yearly in 1980s it changed to 692 000 in 1992, in Europe.[13] The characteristic of Hungary in the 1990s was that the foreigners who came to Hungary for residence originated mainly from neighbouring countries. Between 1990 and 1994, yearly 70-80 per cent of the asylum-seekers had Hungarian ethnicity.[14]

The political system changing was a turning point in transforming of the state type, modernization and rationalization of the public administration. After the establishment of the state type independent public administrative and public service modernization programs were needed, therefore, in 1992, comprehensive public administrative modernization program was prepared. The period between 1989 and 1994 was a historical era in the Hungarian public administration. In Hungary, the state-socialist system was fallen apart and was replaced by a domestic version of a modern civic state type. Perform of the political system changing created a civic type of state, and within that a civic type of public administration. Reforms and rationalizations promoted the modernization of this new type of state.[15]

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[11] Halász Iván, *A nemzetközi migráció és a közigazgatás* [International Migration and Public Administration], (Budapest, Budapesti Corvinus Egyetem Közigazgatástudományi Kar, 2011), 7.

[12] Nyárádi, *Az idegenrendészet és a migráció kialakulása a magyar politikában,* 9.

[13] Lukács Éva és Király Miklós (szerk.), *Migráció és Európai Unió* [Migration and the European Union], (Budapest, Szociális és Családügyi Minisztérium 2001), 307.

[14] Lukács és Király, *Migráció és Európai Unió,* 311.

[15] Verebélyi Imre, 'A rendszerváltozás, a reform, a racionalizálás főbb jellemzői és szakaszai' [Main Features and Stages of the Political System Changing, Reform, Rationalization], in *Rendszerváltozás és modernizáció a belügyi közigazgatásban (1989-1994),* Verebélyi Imre (szerk.), 13-26. 13.

The latest wave of limitation prevailed in 2015 by the migration crisis. The unregulated mass influx of migrants and refugees resulted in unprecedentedly strict rules by the legal and physical closing of the border.

Examples of the latest decades show that the public administrative system has to constantly be made capable for managing and controlling the issues of foreigners within the context of the requirements of functioning as an EU Member State, which aiming at creation of the common immigration and refugee policy in the European Union.

Turkey

The Republic of Turkey is situated such a region where severe problems have to be solved from the authoriter resistance to the weak economic development, from the state failure to the jihad.[16] Many of those promlems occure mass influx of migrants. The immediate environment of Turkey, the region of the Middle East bears several conflicts, which stimulated mass influxes in the past and create mass migration chance in the future, as well. The role of Turkey increased in 2015 in connection with the management of the migration crisis. According to the Frontex reports, in 2018 and 2019, the Eastern Mediterranean route was the main illegal border-crossing point of irregular migration towards the EU.

In history, the peak in reform of the Ottoman state was the establishment of the Turkish Republic, in 1923. Concerning population, the Turkish Republic struggled with demographical and economic challenges in its first decades. Therefore, in the nation building process, Turkey pursued the „open doors policy." At the same time, settlement was motivated only by Turkish descend and culture based upon the Settlement Law. Consequently, this strategy can be called only „semi" open doors policy.

Historical evidences suggest that, in the first half of the 20th century nationalist ideologies influenced the Turkish migration policy. Traditional Turkish immigration policy was strongly defined by the nation building, the state sponsored immigration and the shaping of homogeneous national identity. After the Second World War the developmental paradigm determined the migration policy, what was advantageous for the labour migration by the mixing of the realist and liberal interpretation of state affairs. The era of massive emigration, the greatest labour migration to Western Europe started in the 1960s, which additionally, promoted the Turkish efforts of industrialization and modernization. Labour force migration was followed by the migration of family reunification. The outflow of Turkish asylum-seekers started in the 1980s towards Western European countries.[17]

The immigration to Turkey was renewed after the 1980s due to the economic, societal and political turmoil in the neighbouring countries, which resulted in migratory pressure towards developed Western countries.[18] New era started in the history of migration at the beginning of the 1990s. This was the period of transformation from emigration country to immigration country. Besides, the new form of irregular migration appeared in Turkey, which forced to transform the migration policy. From the second half of the 1990s the number of irregular migrants increased who used Turkey as transit in moving towards Europe. Those migrants came mainly from neighbouring countries, Iraq, Iran and Syria, as well as, from Afghanistan and Pakistan.[19] Then, at the beginning of the 2000s, economic immigration to Turkey started to evolve, as the result of market economy success.

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[16] Ziya Öniş and Mustafa Kutlay, 'The Dynamics of Emerging Middle Power Influence in Regional and Global Governance: The Paradoxical Case of Turkey', *Australian Journal Of International Affairs*, 71, no 2 (2016), 1-30. 26.

[17] Ahmet Içduygu, 'Turkey's Migration Transition and its Implications for the Euro-Turkish Transnational Space', in *Global Turkey in Europe II − Energy, Migration, Civil Society and Citizenship Issues in Turkey-EU Relations*, eds. by Senem Aydın-Düzgit et al (IAI Research Papers. Roma, Edizioni Nuova Cultura 2014), 81-106. 84.

[18] Ahmet Içduygu and Damla B. Aksel, *Irregular Migration in Turkey* (Ankara, IOM. 2012), 7.

[19] Ibid.

In the last thirty years, Turkey faced with the transformative dynamics of migration, when net migration became positive as number of enters exceeded the number of exits. For long decades, Turkey was known as migration source country but today, it faces with the challenges of immigration, transit migration and massive refugee flows.[20]

Turkish public administration is based on European traditions, the Anglo-Saxon type of management. The embedded paradigm of Westernization has been linked up the Europeanization, since that time EU accession was deemed as the only way of modernization. Recently, it has been changed due to the negative attitude of the EU concerning Turkey EU membership. The EU accession negotiations probably will not bring positive result for Turkey by 2023, the centenary of the foundation of the Republic of Turkey.[21]

In 2018, the form of governance was changed and the presidential system was introduced, by which the centralized state was further strengthened. Transformation of Turkey indicates such a trajectory, which started with the Westernization, in 1923, it continued with integration into the globalizing world between 1983 and 1991 and it reached Europeanization by 2000. Today, we see the Europeanization without EU membership.[22]

B Evolution of the complex migratory institutional system

In Hungary and the Republic of Turkey, policy transfer and Europeanization played important role in the reforms of migration management system. The legal basis of it was that for the accession to the EU the candidate country has to be prepared for providing a unified implementing institutional system which are capable to carry out the pre-accession programs and capable for functioning as a member state. According to the Treaty of the EU (Article 10) it has to ensure the efficient implementation of the EU legislation. The implementation of the EU decisions and the legislation at member state level is the task of the national public administrative organizations. Consequently, the fragmented migration-related institutional systems and the separated policy directions above them endangered of the fulfilling of obligations.

In Hungary, the law enforcement character of the aliens' policing was transformed into a civil (non-uniformed), service-like management in the course of the reform processes at the beginning of the 2000s. As eleven years later, similar transformation was carried out in Turkey, and this migration management reform evolved parallel with the migration crisis in 2015. Due to the complex character and the securitization of migration issues, the reform of the migratory institutional system became a priority again on the Hungarian agenda. Consequently, the complex civil migration institution was transformed into aliens' policing police, in 2019. This study argues that the process was not simply a U-turn but the migration management stepped onto a new level in Hungary. Despite of the millions of Syrians and the security impacts of the situation, similar return of migration management to law enforcement did not take place in Turkey.

Hungary

From migration management point of view, during the political system changing such significant reforms were passed both, in the regulatory environment and in the institutional structure, which created the foundation of recent migration management, as well. Due to the reservation of the geographical limitation of the Geneva Convention, the Hungarian

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[20] Içduygu, 'Turkey's Migration Transition and its Implications for the Euro-Turkish Transnational Space', 84.

[21] Seriye Sezen, 'International versus domestic explanations of administrative reforms: the case of Turkey', *International Review of Administrative Sciences,* 77, no 2 (2011), 322–346. 340.

[22] Szuhai Ilona, *A migrációs igazgatás reformja Törökországban a 21. században: lehetőségek, kihívások és eredmények* [Reform of the Migration Management in Turkey in the 21st Century: Opportunities, Challenges and Results], (Doktori (PhD) értekezés, Nemzeti Közszolgálati Egyetem, 2021), 213.

government agreed with the UN High Commissioner for Refugees (UNHCR) to conduct refugee status determination processes in its mandate in the cases of the asylum-seekers arriving from third countries.[23]

Although, the Police performed the aliens' policing tasks exclusively till 1989, the migration-related institution system was fragmented: tasks were at the Police, at the then Border Guard, Ministry of the Interior, the Governmental Offices and the Migration Office. The policy directions above those organizations were separated, consequently, the governmental migration policy will could not efficiently be realized. It endangered the efforts to improve the public security situation.[24]

Lack of a central organisation stood out, which is able to realize the transposition of EU legislation with standard implementation, the constant legal harmonization, comprehensive management of migration area, and the effective cooperation with EU organisations in the policy areas, in accordance with EU requirements. Conditions for the future function as a Member State had to be created.

Changes in competencies were the outcomes of reform processes in public administration. Important reform plan started in 1997, according to which the migration-related competencies does not need law enforcement type of implementation, should be taken out from the Police competency. According to the public administration development program of the government, migration-related competencies should transpose to other public administrative organizations. Further on, functions in connection with immigration, residence, refugee, and citizenship affairs should be institutionally approximated.

The goal of the government was to create a new, civil (non-law enforcement) migratory structure. This goal was completely reached by 1 January 2002 when the Office of Immigration and Nationality functioned as a unified migration management organisation with national competency. Governmental expectations were to create a unified implementation of rules, to increase the level of professionalism, to provide a service separated from the Police and law enforcement.

As twenty years later, due to the situation of international migration, adverse prospects, fight against terrorism, the interest in improving the security of the country and the predominant law enforcement functions in the tasks of the organisation, a governmental demand for the change of legal status of the institutional system was suggested.

In the history of the unified migration organisation, the most significant change took place on 1 July 2019. The status of the office became a law enforcement body. It got under the scope of the Act of the Police. Its name changed to National Directorate-General for Aliens Policing (further on: Directorate-General) and it is functioning as a Police organisation. The lawmakers reasoned that significant institutional change with that the aliens policing authority and the refugee authority by their mixed functions fulfil both public administrative and law enforcement tasks. In the former structure, public administrative tasks were predominant, but present refugee-related and aliens policing tasks expand over the general public administrative power. Beside these facts, in order to identify and screen the public security and national security risks arising during refugee-related and aliens policing tasks it is reasonable to transform the authority to law enforcement organization.

The Directorate-General belongs under the direction of the minister responsible for law enforcement, it is a central budgetary organisation, which fulfil aliens policing- and refugee-related tasks. Its structure divides into central organisation and directorates. In connection with the reformed institution, governmental expectations are, as a police organisation, to act

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[23] Végh, 'Változások a migrációs igazgatásban Magyarországon', 67-68.
[24] Végh, 'Változások a migrációs igazgatásban Magyarországon', 72.

definitely against illegal migration, and the persons violated the law and to contribute to strengthen the security with the view to national interests.[25]

The speciality of the migration institution system is that Directorate-General ensures the new generation of the staff. In 2012, the Department of Immigration was established at the Faculty of Law Enforcement of the University of Public Service. The members of the Department are directed from the own staff of the Directorate-General. This form of education is a special one, after which the Directorate-General receives skilled and graduated colleagues who are able to start working without further preparation time.[26] The introduction of migration training as tertiary education can be deemed as innovation in domestic and, also international environment, since it is a unique practice to integrate the political science, military and law enforcement education at tertiary education level."[27]

Turkey

Making public administration more efficient in the area of migration is a part of comprehensive reform processes and is in connection with Europeanization. The migration situation of Turkey demands comprehensive, modern and effective migration management system. In order to reach that goal government realized significant reforms in the migration management. The most important moment of that was to pass the Act on Foreigners and International Protection (further on: Law package) on 4 April 2013.[28] Then President, Ahmet Gül and then Prime Minister, Recep Tayyip Erdoğan called that development a historical moment. The European Union and the international organisations praised the Law package, since it indicates that Turkey is committed to the principle of international protection by building a migration management institution system according to the EU and intenational norms.[29]

The transformation of the legal and institutional background of migration management was an innovative step. The following factors give the historical character of the recent reform of migration management:

1) Previously, the migration area was characterized by police predominance, but is has gradually changed and a new institution took over its role. By this, in immigration policy the policing-centred decision making got into civil public administration;

2) Asylum and generally, the legal status, rights and obligations, as well as the societal integration of foreigners and the persons need international protection were regulated by a legal Act for the first time.

The Law package contains three parts, regulation:

1) on Foreigners;

2) on International Protection;

3) on the establishment of the Directorate General for Migration Management.

Accordingly, the Law package lays down entry, stay and integration of foreigners, as well as, asylum procedure, the rights and obligations of all participants in procedures. The regulations on the establishment of the Directorate General for Migration Management came into effect immediately in 2013.The regulations on Foreigners and on International Protection came into force in 2014. There was one year to prepare the bylaws and institutions in the provinces, recruit the new staff and the handover the police tasks.

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[25] Végh, 'Változások a migrációs igazgatásban Magyarországon', 78.

[26] Szuhai Ilona, A migrációs képzés tapasztalatai a Nemzeti Közszolgálati Egyetemen [Experiences of the Migration Education at the University of Public Service], *Migráció és Társadalom*, 2016, no 2 (2016), 1-13. 4.

[27] Hautzinger Zoltán, 'A migráció és az idegenjog rendészeti felsőoktatásáról' [About the Law Enforcement Higher Education of Migration and Aliens Law], in: *A toll sokszor erősebb, mint a kard,* Deák József et al. (szerk.), (NKE Rendészettudományi Kar, Budapest, 2016), 112-123. 114.

[28] Law No. 6458 on Foreigners and International Protection published in the Official Gazette dated 11.04.2013 and numbered 28615.

[29] Szuhai, A migrációs igazgatás reformja Törökországban a 21. században, 180.

Before 2013, Turkey did not have comprehensive Act on Aliens' Policing or Act on Asylum. Previous migration-related regulations were fragmented in legislation, in various decades-old acts or decisions. Therefore, the implementation based on complicated system of internal ordinances, which did not provide unified enforcement in the 81 provinces of the country. Before the reform of the migration management system, till 11 April 2014, the Police were the competent authority in migration- and refugee related matters. The speciality of the Turkish asylum system is that the Republic of Turkey upholds the geographical limitation in implementing the Geneva Convention of 1951 on the status of refugees even today. Although, the European Union regularly demand the lifting of that reservation as a condition for the accession.[30]

Beside the European requirements, the main reason of passing the Law package was that Turkey ratified the majority of international human rights conventions after passing the previous laws (Passport Law, Settlement Law and so on) based on the regulations of the 1924 Constitution. That constitution narrowly declared basic rights. Consequently, Turkey wanted to fulfil international obligations properly and they wanted to regulate rights and obligations of foreigners at the highest legal level. Moreover, the Law package tried to create balance between the previous security-oriented regulation and human rights.[31]

In connections with the reforms introduced by the Law package, governmental expectations from policy point of view were to have a solid migration management policy, effective act against irregular migration, at the same time to provide consistent framework for legal migration by creating an efficient and manageable system keeping the balance between security and freedom in accordance with EU norms.

At the end of 2021, the status of the Directorate General of Migration Management changed to Presidency within the Ministry of the Interior by a Presidential Decree.[32] It became the Presidency of Migration Management and it has more directorate generals: Directorate General of Foreigners, Directorate General of International Protection, Directorate General of Combating Irregular Migration and Deportation Procedures, Directorate General of Harmonization and Communication, Directorate General of Management Services.[33]

Duties of the Presidency of Migration Management, among others, developing legislation and administrative capacity in the field of migration and monitor and coordinate the implementation of policies and strategies determined by the president of the republic; carry out activities and actions related to migration; protection of victims of human trafficking; conduct determination procedure of statelessness. As the outcomes of the reform process, presently this centralized, civil institution perform the tasks in connection with entry, stay, detention and return of foreigners and with international protection within the Ministry of the Interior.

Beside central level, the second line of migration management means the provincial migration directorates in 81 provinces. Third level means Turkish foreign representations abroad, where counsellors manage visa and residence applications.

In recruiting the staff of the new institution, it did not take over the experts from the Police. Civil, graduated members started to work with knowledge of foreign languages, especially Arabic, some African or Asian languages.

In migration management one of the biggest challenges for Turkey was the transformation of migration-related regulation and civil, unified institutional system, which took over

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[30] Szuhai Ilona, A történelmi hagyományok szerepe a török migrációs politikában [The Role of Historical Traditions in the Turkish Migration Policy], *Acta Humana*, 2016, no 4 (2016), 79-90. 80.

[31] Szuhai Ilona, 'Az első török lépések a korszerű migrációs igazgatás kialakításában' [First Turkish Steps in Forming the Modern Migration Management], in *Pécsi Határőr Tudományos Közlemények*, XIV. Tanulmányok "A változó rendészet aktuális kihívásai" című tudományos konferenciáról. Gaál Gyula, Hautzinger Zoltán (szerk.) (Pécs, Magyar Hadtudományi Társaság Határőr Szakosztály Pécsi Szakcsoport, 2013). 309-315. 310.

[32] Presidential Decree No. 85 published in the Official Gazette dated 29 October 2021 and numbered 31643.

[33] https://www.goc.gov.tr/

competencies from the Police. Catalyst of the process was the increasing migration pressure as result of the Syrian and other conflicts in the region.

IV.   Conclusion

The study presented a short comparative analysis of migration management reforms in Hungary and the Republic of Turkey. It revealed the reforms took place in the last decade in migration institutional systems of the two, mainly transit countries. The 21th century gave a new period of migration transformation. Globalization and Europeanization resulted in the transformation of the migration policies. The new migration policies are parts of the modernization of the state and public administration, as well as the Europeanization process in both countries. Beside the historical impacts, the transit character of the country, the current status of international migration and the governmental goals played determining role in elaborating the migration strategy.

Based on the research, it can be stated that different institutional background of the country may lead to the balance of security and freedom of movements. At the same time, the governmental expectations from migration management institutional reforms are the same:

1) Preserve the safety and national interests of the country;
2) Act efficiently against illegal migration;
3) Strengthen the security.

The findings of the comparative analysis of migration management reforms have underpinned the similarities and significant differences of the Hungarian and Turkish migration policy. Similarities and differences in migration policy manifested in migration institutional systems, too.

The political system changing in Hungary was a milestone in the migration management. The country became open, the increasing number of foreigners, the modernization of the public administration, as well as, the increasing transit migration, later the EU requirements demanded a central unified migration management organization.

The important legal and institutional reform processes concerning migration and the pass of the new law on foreigners and international protection reflect the political will that Turkey wanted to fulfil the European requirements and would like to manage and control better the irregular migration flowing in its territory. At the same time, the Turkish government did not take the opportunity to perform a real historical reform by lifting the geographical limitation attached to the Geneva Convention and implement it without limitation.

In the certain periods influenced by historical and political impacts, the changes of the dynamics of Turkey's migration show that both, historical legacy and reforms exist in migration policy. This policy is still under transformation due to constant migration pressure, fast changes of global migration and the Europeanization. Therefore, Turkey's migration strategy directly affects migration concerning the EU.

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